

Local Plan Regulation 19 representations in document order

**Comments on Section 5: Place
Shaping Policies: Strategic Sites:
Tudeley Village and Paddock Wood,
including land at east Capel**

Supporting Information File Ref No: SI_58

Comment

Consultee	Hilary Andrews [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Whetsted Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Hilary Andrews [REDACTED]
Comment ID	PSLP_967
Response Date	03/06/21 12:38
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Flooding Evidence STR SS1.pdf
Question 1	
Respondent's Name and/or Organisation	Hilary and Nick Andrews
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1 The Strategy for Paddock Wood including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Para 5.160

See comments on release of Green Belt and lack of evidence for “exceptional circumstances”

Para 5.161

There is an easier way to “minimise perceived coalescence between settlements” and that is not to re-designate existing Green Belt land, not to build on it and maintain the GreenBelt for its original purpose of preventing urban sprawl.

Para 5.163

Fluvial flood risk is indeed considerable, one could say insurmountable. We have lived in our property for 28 years. Although our house sits in Flood zone 1 , on the edge of the STR/SS1 site, and has not flooded during the last 28 years, we have accrued photographic evidence of fluvial flooding during bouts of heavy rain. (see pdf) . We do not consider that TWBC has fully considered the risks of building on this agricultural land and that fluvial flooding will increase once the land is covered in concrete. Our house which has stood for 300 years will undoubtedly flood should this development go ahead.

Paddock Wood is already overdeveloped – (documented in 2016). Flooding and flood mitigation have not been fully addressed by the Local Plan

Our property sits on the edge of STR/SS1, East Capel. Our house pre-dates the 1890 ordnance survey map and so has been standing a long time. According to the Environment Agency pour property is classified as Zone 1. Our house is old and built on the only slight rise in elevation of land in East Capel and has not flooded during the 28 years we have lived here. However, the garden and patio areas immediately surrounding our house always flood whenever there is heavy rain or prolonged periods of heavy rain as evidenced in the photos (attached pdf). The water table quite obviously sits not far from the ground surface at times, as is usual on a flood plain.

We know the area very well. The flooding of the farmland near us (all situated within STR/SS1) has noticeably increased during this time. The farmland is surrounded by large and significant ditches that have been there for years to drain the land. They have generally worked, assuming the ditches towards

the Medway are kept clear. Flood water soaks or drains into Tudeley Brook which flows towards the Medway.

STR/SS1 is a floodplain. The fields are waterlogged in the winter with three fields in particular being perma-flooded during a typical wet winter (see photos) . There is very recent evidence (that has been ignored in the plan) that this area floods and insurance for local properties has risen significantly. We note that a mortgage application for a property in Maidstone Road, Paddock Wood (near Baxalls) was declined due to it being a flood risk. Therefore simply building and hoping that mortgages are attainable is nonsensical – each mortgage application will need to advise the lender they are in flood plains/areas of flood risk and floods have occurred regularly, (to not advise the mortgage lender is of course fraudulent and renders any insurance payout as nil). Insurance premiums and cover for residents currently in the area who have experienced flooding, is substantial, if available. Some properties on the edge of STR/SS1 that have flooded in the past have been required to build dykes, reservoirs and pumping stations simply to obtain insurance cover.

Large parts of the proposed developments will be on the Medway floodplain with flood risk assessments based on old data that do not fully consider the impact of climate change. Flood mitigation measures may help, but we believe that flood risks will increase. Covering agricultural land with houses and roads will increase flooding not only in Capel but in Golden Green, East Peckham, Tonbridge and Yalding.

The concept of fluvial flooding has not been satisfactorily addressed in the plan. Water has to go somewhere and quickly; covering the land to stop it absorbing water speeds the run off towards the Medway, the natural drain for the whole area. Whatever plans there are for flood prevention will not be sufficient without sacrificing either the houses proposed on STR/SS1 or those downstream at Yalding and ultimately Maidstone. Again, a problem that has been dumped on a neighbouring council. Flooding is a problem that does not just disappear and will get progressively worse with rising water levels/climate change. We are of course pleased that the TWBC Head of Planning, Stephen Baughan verbally “guaranteed” on behalf of TWBC at the May 2019 meeting of residents of Capel that no residence in the proposed sites will flood; this is a contingent liability that TWBC will have to manage through their balance sheet in terms of provisioning for future flood risk.

In the STR/SS1 Area, the current water table is approximately 18inches below the ground level, this is typical for the time of year and it rises rapidly in time of heavy rain. That water table is closer to the surface in some of the fields. The B2017 Badsell Road to the East of the A228 is regularly flooded (as was the case on the 11th November 2019 at 6.30am).

A neighbouring council (Nettlestead, Maidstone) recently declined a new property building application on the basis that it was likely to flood and would need to be built with the ground floor at least 2 meters above current ground level – that proposed property is in the run off area near the Medway which would drain the flood waters from the STR/SS1 and STR/SS3. That council knows the implication of future flood risk.

Para 5.177

We do not believe the masterplanning work undertaken by David Lock Associates is sufficient in determining the deliverability of the proposals in terms of flood modelling.

Para 5.181

Please see pdf photographic evidence of flooding which demonstrates a distinct lack of potential viability for active movement across site STR/SS1.

Para 5.182

Paddock Wood Wetlands Park does not need to be proposed as a “significant area of natural open space, enhancing locally distinctive natural habitats”. The fields and footpaths through this site perfectly adequately provide a natural open space at the current time.

Para 5.183

The proposed development which will cover prime agricultural land with concrete, and therefore prevent the current ability of that land to drain and absorb water will undoubtedly NOT “provide an opportunity for betterment to the flooding and drainage issues which are present...”

Para 5.187

- 1 With the developments of STR/SS1 and STR/SS3 being situated so close to Whetsted, and Five Oak Green and Tonbridge, effectively joining Paddock Wood to Tonbridge it is impossible to envisage how residents of any of these areas will be able to distinguish themselves as residing in an area with a “distinct local identity”.

Para 5.188

Construction is one of the most polluting industries both in the production of the materials and the energy consumed to build the houses and infrastructure. Concrete production is one of the worst offenders. The initial carbon emission numbers have not been provided to judge whether anything really will be zero emissions. Low carbon missions are still pollution and with 2060 and 2800 houses on both sites of STR/SS1 and STR/SS3, roads and infrastructure projects, multiples of “low emissions/pollution” will in aggregate, be significantly more than are produced at the current time.

COP26 Glasgow in 2021 will likely be announcing the need for carbon capture from natural resources to become one of the primary and most important aims in respect of the world's effort to stem rising climate temperatures. The G7 meeting in Cornwall is also likely to say the same thing. Natural assets are carbon absorbing and remove carbon from the atmosphere; low and zero carbon emissions do nothing to remove carbon, but in the latter case, make matters worse.

Ralph Chami of the IMF, the world's leading expert on carbon capture by natural resources has opined on the destruction on the land in both STR/SS1 and STR/SS3 as short sighted and contrary to the objectives that the government will likely be signing to under the Paris Accord. TWBC has not made any analysis of the obligations that the government will likely impose under this Accord regarding natural resource carbon capture and TWBC are blandly and incorrectly appearing to assume that heating and energy supplies can be switched away from gas and existing energy generation to renewable energy sources.

This is a statement being made regarding the preservation and valuation of natural assets e.g. green belt and agricultural land at STR/SS1 . The UK Government is expected sign up to this statement either through G7 , COP 26 and/or the Paris Accord . It is showing that natural assets have greater value than development value and must be preserved. *"The Committee directs the executive director of the International Monetary Fund (IMF), in consultation with the President of the World Bank, to amass evidence on the economic value of carbon sequestration and related economic benefits for ecosystem services and contributions of living, healthy keystone species, and whole ecosystems, in a portfolio of natural capital assets; to design a system of national accounts for natural capital assets, including a modular framework for governance and stewardship of natural capital assets by local communities; and to support community stewardship and monitoring of natural capital assets that is designed to maintain and increase their local and collective value and sustainability."* This needs to be taken into account.

Heat pumps as one of the alternatives to achieving TWBCs goals of zero and low carbon emissions (ie pollution) are expensive to instal, use enormous lengths of oil derived plastic tubing and bulky. The proposed houses do not have the land for the buried tubing nor will likely have the internal capacity

to house the equipment (usually standard garage size). They use a lot of electricity at a time when electric cars are growing in number and consuming a finite source of electricity. Heat pumps react slowly to changing calls for heat and cannot produce water hot enough for spot heat or for a domestic hot water system.

In this part of the UK, to be able to rely on renewable energy, solar farms would require significant battery farms to manage the supply needs when there is no sun. Battery farms do not last long in wet conditions (as Adelaide in Australia has found out). TWBC has not provided any information as to where this renewable energy will come from. There is no information as to where these renewable plants will be located within the area to provide the power required.

Solar power has also required subsidies to ensure that it is economically viable and therefore any such development to be sustainable and carbon free needs subsidies – these have not been factored into the economics of meeting TWBC's stated aim of being low and zero carbon.

TWBC has not given any thought, analysis or consideration to what this actually means and therefore the whole plans for STR/SS1 and STR/SS3 are simply using the pretence of environmental credentials and sustainability as a veneer.

Question 6

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TWBC should remove STR/SS1 from the local plan as an unsuitable, ill thought through and unjustified site for housing and development.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To have our voices heard which were largely ignored by TWBC at Reg 18 process.

If you would like to attach a file in support of your comments, please upload it here. [Flooding Evidence STR SS1.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sheila Craft [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Sheila Craft [REDACTED]
Comment ID	PSLP_1153
Response Date	04/06/21 00:52
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Mrs Sheila Craft
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

.	It is not justified
.	It is not consistent with national policy

Question 5

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STR/SS1, page 145, point 3 states that 40% of the housing will be affordable and phased in line with policy H3. Existing developments (Mascall's Farm site) have not supplied 40% affordable housing therefore we have lost faith with TWBC planning department to enforce it's own statutory requirements. Furthermore, local residents on the TWBC housing waiting list have surpassed by residents from boroughs out of the area.

SSTR/SS1, page 146, point 13, Ensure a drainage strategy is in place in consultation with the local planning Authority, Kent County Council and Southern Water as the drainage authority prior to the grant of planning permission for ANY substantial development on the site "unless Exceptional Circumstances arise". The comment should be erased as this wording constitutes a get out clause to the authority for not improving drainage prior to development. TWBC has tried to sell this local plan on the proviso that it will ensure all infrastructure is provided for major projects such as drainage are agreed prior to commencement of development. We already know that TWBC did not involve Southern Water prior to granting planning permission to the current developments of at least 1000 houses in Paddock Wood and there have been problems connecting to the foul water sewerage system. How can we have confidence if the wording of the local plan is biased in favor of the developers. Southern water were not consulted so they could allocate monies in their capitol programme. Infrastructure planning would need to be robust as developers always try to get retrospective planning for additional houses above what has already been planned. Can the council guarantee that developers will not get retrospective planning as at the council extraordinary meeting the head of planning said that they would by having a local plan, have control and prevent overdevelopment.? Will the plan ensure there is not high density development?

SSTR/SS1, Investment in Town Centre, para 5.195, it says "it is anticipated around 30 residential dwellings can be delivered through re-development of town centre sites" With the ongoing developments and plans for another 4000 houses, why was permission granted for residential properties with the loss of commercial space in the town centre? I understand the local Paddock Wood Town Council and the Borough Council, both objected but were over ruled. Is this something we should be concerned about when this plan goes before the government inspector?

Para 5.196 we note that the pandemic has been mentioned in support of more people working from home. Not all people can work from home and the addition of 5000 more dwellings will negate any gains regarding the commutable population.

SSTR/SS2 Transport.

The idea that there would be an additional station between Paddock Wood and Tonbridge has been declined by Network Rail. Capacity cannot be increased as you can't add any more rolling stock to the trains as the platforms aren't long enough. The idea that people will walk and cycle is fanciful and the closure of the railway bridge to all but pedestrians, cyclists and buses (not sure about taxi's and emergency vehicles) will effectively cut one side of Paddock Wood from the other. This flies in the face of the oft use phrase "sustainability as it will increase pollution and congestion in other areas of the town, with particular safety concerns around the cross roads at the Maidstone and Badsell Road junction close to Mascalls School.STR6

Car parking, what is meant by the term rationalization of car parking? We cannot think of any sites within the town centre a multi-stores car park can be placed. The Borough council does not own the station car park and the East and West car parks are too narrow for safe access. These two car parks belong to Paddock Wood Town Council park and we would like to retain our free car parking to support our local businesses which would definitely tick the box for sustainability.

How tall would the multi-stores car park be, would it too industrial for the town centre, where would the entrance and exit be? Previous planning permission has been declined for much smaller scale vehicular access onto Commercial Road. There has already been loss of parking spaces due to the much objected to Churchill development which doesn't have enough parking spaces for the number of dwellings and visitors who most likely will arrive by car.

The Strategy for Paddock Wood- Overview

Para 5.239, Flood Risk. I have lived in Paddock Wood for 35 Years. Only in the last 5 years have we noticed an increase in surface water flooding. Some of this is due to poor infrastructure, poor planning without consulting other stakeholders regarding the drainage of foul water and surface water and moreover global warming increasing the amount of precipitation. In addition, to Paddock Wood being on a flood plain, it is also on impervious clay so drainage is slow. We can if the government inspector requests, supply photographic evidence of flooding in the town. My concern is the more surface area covered in concrete we have, the less area there is for water to be absorbed leading to displacement of water to existing residents, as the developers will ensure their properties are raised. See Infrastructure delivery Plan, Live Draft December 2020, Tunbridge Wells local plan, para 3.141 states "raised platforms of at least one meter are required for around 11 hectares of development on the Western side of Paddock Wood, to ensure flood waters remain outside of residential areas and to ensure betterment of Paddock Wood. How does this improve betterment for existing residents who aren't raised up more than a meter adjacent to the proposed development.

The Kent County Council Paddock Wood Flood Alleviation Study (Jackson Hyder 30/04/2015), has been superseded by another study commissioned by TWBC which plays down the flood risk in favour with the local plan. The Environment Agency report was also less favorable

How will TWBC ensure agencies responsible for mitigation of flooding fulfil their statutory duty as currently, residents are passed between agencies such as The Upper and Lower Medway Internal Drainage Board, The Environment Agency and Town and Borough Councils when they have been flooded?

Policy AL/PW1 Pre-submission Plan

point 6- Any proposal to be accompanied by detailed ecological studies.

We never see copies of the ecological studies, and we do not believe they independent of the developers as witnessed at the Church farm development. The ecologist employed, had a path strimmed for her, which would obviously scare any wildlife away and then she proceeded to crouch down for a couple of minutes to see if there was anything to see. This is surely not compliant with a thorough and unbiased assessment of the local ecology.

We do not see any evidence as to how wildlife and fauna is re-located or protected or re-introduced. Evidence of displacement of foxes has been noted by residents with more seen in gardens and deer running down the roads, bats flying into windows, destruction of mature oak trees without permission or need to fell, nesting birds threatened and the Police Wildlife officer being involved as it contravened the Wildlife and Countryside Act (photographic evidence can be provided) TWBC did send anyone hence the Police being involved. We do not have confidence TWBC are capable of protecting the environment as they cannot hold developers to account with any sanctions or do not have the will to peruse contraventions of planning regulations.

Paddock Wood Inset Map 4

Concern that Whetstead Woods EN13 is shown on the parcel of land to the West of Paddock Wood. This is ancient Woodland so should be preserved. It is well used by the public as a leisure area and appreciated as an asset to the area. It is important for wellbeing and sustainability of the natural environment with the added benefit of limiting flooding. We know there are birds of prey in these woods and possibly are protected species.

Point 9

Failure of TWBC to ensure overground electricity pylons were grounded prior to the development at Mascalls Farm as outlined in phase one of development. This was also discussed with Gregg Clark, our local MP who said he would be looking into it as he stated "infrastructure before development" at his surgery via a zoom meeting. Again, this points to a lack of enforcement and undermines public confidence in the councils ability to manage developers and project manage.

point 10

What does a contribution 'may' be sought towards the associated infrastructure for the planned strategic growth? The word 'may' immediately gives developers a get out clause for not contributing. This needs re-wording.

Transport connections- Map 33

Colts Hill bypass- phase one of this scheme exits at a notorious accident black spot at the stagger crossroads at Crittenden Road and Alders Lane. Traffic congestion is already bad due to these roads being ratruns. The second half of the Colts Hill A228 bypass is dependent on the KCC having the funds to complete. As the KCC didn't have the funds to improve the junction at Badsell Road and Maidstone Road in Paddock Wood, what is the likelihood of this road improvement being completed?

A lot of assumptions around infrastructure projects are made without concrete proof funding will be available.

Objection letter from neighbouring Tonbridge and Malling Borough Council regarding the impact on road infrastructure and impact of additional traffic to Tonbridge, pressure on commute on trains.. TWBC has failed to co-operate with neighbouring councils and dismisses any objections from Paddock Wood Town Council or the local residents regarding the scale of the planned developments on Greenbelt land which also goes against national government policy.

assets.publishing.service.gov.uk, Planning and flood risk para 155 says,

"Inappropriate development at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary, in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'.

I cannot understand why TWBC has decided to place more than 60% of the local plan in a flood risk area. Tunbridge Wells or other elevated settlements would be much more suitable locations.

Question 6

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Re-engage with all residents and neighbouring boroughs and listen. Compromise as plan is too ambitious and the council is not legally obliged to build this many houses whatever they tell us.

Evidence required that local housing need is as high as the proposed numbers as we don't believe it is as houses are being sold on current developments to London boroughs. Houses have even featured on YouTube aimed at Chinese buyers. (Berkeley Homes)

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Health Care Provision and education.

Having worked in the NHS for over 40 years, I know at first hand there are shortages of clinicians, nursing and allied health professionals.

Although a new Health Centre is an admiral proposal, recruitment of staff will be an issue. The Royal College of General Practitioners (RCGP) paper 'Fit for the Future-A vision for General Practice discusses NHS challenges. In England there are 4.5 GP's for every 10,000 patients. Government overseas recruitment for an additional 2000 GP's resulted in only 140 additional.

Another concern is there is no mention of affordable housing for key workers. How will we staff new schools and Health centers as it's too expensive to buy here. For example, the prices of the Berkeley Homes start at £252,000-275,00 for a one bedroom flat. (They're probably the ones situated under/ near the pylons) 2 bed houses £335k- 345k and upwards to an eye watering £820k for a 5 bed house. So, a one bed flat is almost 10 x the salary of a newly qualified teacher or nurse.

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Comment

Consultee	Vince Greene [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Vince Greene [REDACTED]
Comment ID	PSLP_277
Response Date	22/05/21 21:36
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Vincent Karl Greene
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
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Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

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I have been a rambler in the area for many years and use the footpaths in the Tudeley area quite a lot because I enjoy the physical and mental benefits of walking in the area and to nearby villages. I have a deep love of nature and appreciate our need and reliance on it, not only for food production but for biodiversity, pollination and clean air.

The proposed removal of vast tracts of Green Belt would severely impact this essential and national activity, for me and countless others - permanently here for all future generations.

Wild animal life would be severely affected by mass house building, not just by having less space to survive but for lack of food. This would impact the food chain through appalling and irreversible damage to biodiversity. This with the loss of Green Belt farmland would mean a marked decrease in the ability to feed our borough and to have good food quality and quantity from any land remaining. As all other boroughs in the country are facing the same prospects, the developments are not in the 'national interest' because it would contribute to the progressive lack of farming space. This is an alarming prospect because the UK simply cannot afford to import most of its food. The Local Plan is 'not consistent' with national policies for Green Belt and AONBs, and the mass release of Green Belt for development is 'unsustainable' because of the 'unique impact' on it of being converted en masse to housing.

'Exceptional circumstances' are needed to release Green Belt but there is none defined in NPPF or Planning Practice Guidance. Green Belt release may be ameliorated or reduced to the lowest reasonably practicable extent but in the case of Tudeley there would be 'High Harm' to it.

The amount of trees and hedgerows needing felling for the developments is also of deep concern to me. The clean air produced from trees is essential to counteract pollution, and birds and wildlife generally need contiguous hedgerows, copses and woods to form a country-wide network. Isolated wildlife areas in the midst of farmland and housing suffers for lack of accessibility to food, nesting places and mating partners and i am particularly concerned about 'veteran' trees, hedgerows and woods around Tudeley. Some trees in Tudeley are hundreds of years old and form part of our heritage as well as being there for pleasure and the appreciation of our natural environment. Plus, the long term detrimental effect on the leisure industry from the progressive lack of green space has not been addressed in the Local Plan either.

The proposed 'green and blue' areas in the Neighbourhood Plans have not been legally defined in the Local Plan. There is no detailed account of how these will be mapped, created, maintained, protected or how any of this would be policed.

Fields used farming are part of our heritage and may be needed again if anything detrimental should happen to the national, European or world economy - as well as from having to feed an increased population in coming decades. The threat of future pandemics like the current Covid 19 outbreak have also not been addressed. There could be a time when food imports are severely affected, resulting in

starvation for whole regions no longer able to grow their own food locally and unable to import due to fears of disease transmission and unable to afford imports anyway.

There has not been enough use of brownfield sites such as of the old cinema site opposite the council offices in Tunbridge Wells. Inner town regeneration, though costing more initially, seeds tremendous and spectacular benefits later on in giving proximity to town centres and giving easy access to facilities and infrastructure already in place. Use of brownfield sites prevents towns and villages from merging into one another and exacerbating problems, as would be the case with the proposed mass house building at Tudeley. Brownfield usage also helps to stop inner towns becoming run-down, derelict, poverty-ridden crime spots covered in graffiti, that threaten to bring down whole regions and inevitably, house prices too.

This all amounts to a shocking failure of 'soundness'!

Question 6

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Because the population of the UK and of the borough is not going to increase by the phenomenal rates proposed in the forecast in the Local Plan, which I challenge, the Standard Calculation of the government for house building should be used instead for the Local Plan and the 'c + 10%', 'c + 26%' and 'windfall' calculation tools abandoned. In addition, use of brownfield land and less emphasis on Tudeley is key.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

My love and passion for the area and awareness of the issues make me a highly valuable addition to any meetings. Please include me in as many of them as possible.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Use of brownfield sites and vacant properties in Tunbridge Wells is a more common sense approach rather than letting developers build more or less where they want to. I don't want to see needless destruction of countryside where other avenues are available. Having thousands of new homes in the borough within a generation would mean an incredible doubling of the population (looking at what's happening nationwide) and this is simply not a realistic forecast.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter Hills [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter Hills [REDACTED]
Comment ID	PSLP_748
Response Date	01/06/21 11:49
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Peter Hills, xxx, Postern Lane [TWBC: part of postal address redacted for privacy]
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/ SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Postern Lane, on the border of Tonbridge and Tunbridge Wells for 9 years. I am extremely concerned about the impact of this development on the infrastructure (roads, shopping and public transport) of Tonbridge.

The development proposed for Tudeley will have a significant impact on the the neighbouring area of Tonbridge, being so close the border with Tonbridge and Malling Borough Council (TMBC). The plan shows insufficient evidence that an effective consultation has taken place with TMBC.

This strategic site has no significant proposals for public transport and assumes a significant decrease in car use when modeling transport projections. I believe these projections are unrealistic and the transport impacts on the neighbouring areas will be significant, highly detrimental and that there are no practical means of mitigation.

The landscape damage from this development would be significant and has not been properly assessed by TWBC.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Significantly more work is required to justify this strategic development. In the absence of this work the proposal should be removed from the plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

None

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sherilee Holliday [REDACTED]
Email Address	[REDACTED]
[REDACTED]	
[REDACTED] Name	Pre-Submission Local Plan
Comment by	Sherilee Holliday [REDACTED]
Comment ID	PSLP_75
Response Date	29/04/21 13:41
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Sherilee Holliday
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a Paddock Wood resident for over 10 years.

I believe that the proposal for Paddock Wood and Capel is not the right place for such a large scale development. We do not have the roads and infrastructure in place and we flood regularly. There are not enough primary schools and doctors surgeries to handle this amount of people.

Sadly Paddock Wood has already had a vast amount of development taking away a huge amount of green space, one which during the last year has been vital to our mental health. Taking these areas of green space leaves Paddock Wood with very little left and a huge loss to wildlife.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_156

Comment

Consultee	Strategic Planning ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) (Strategic Planning - [REDACTED])
Comment ID	PSLP_2192
Response Date	04/06/21 16:56
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Kent County Council-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel

General Commentary

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP_2164), Section 2 (PSLP_2168), Section 3 (PSLP_2169), Policies STR1 (PSLP_2170), STR2 (PSLP_2171), STR4 (PSLP_2172), STR5 (PSLP_2174), STR7 (PSLP_2175), STR8 (PSLP_2176), Section 5 (PSLP_2177), Section 5: Royal Tunbridge Wells (PSLP_2178), Policies AL/RTW1 (PSLP_2180), AL/RTW5 (PSLP_2181), AL/RTW7 (PSLP_2183), AL/RTW14 (PSLP_2184), AL/RTW17

(PSLP_2185), AL/RTW21 (PSLP_2187), STR/SO1 (PSLP_2188), AL/SO1 (PSLP_2190), Strategic Sites (PSLP_2192), STR/SS1 (PSLP_2193), STR/SS2 (PSLP_2195), STR/SS3 (PSLP_2196), STR/PW1 (PSLP_2199), AL/PW1 (PSLP_2200), STR/CA1 (PSLP_2201), AL/CRS1 (PSLP_2202), AL/CRS2 (PSLP_2203), AL/CRS3 (PSLP_2204), AL/CRS4 (PSLP_2205), AL/CRS6 (PSLP_2206), AL/CRS7 (PSLP_2207), STR/HA1 (PSLP_2208), PSTR/BE1 (PSLP_2209), PSTR/BI 1 (PSLP_2210), PSTR/BM1 (PSLP_2211), PSTR/FR1 (PSLP_2212), PSTR/GO1 (PSLP_2213), PSTR/HO1 (PSLP_2214), AL/HO1 (PSLP_2215), PSTR/LA1 (PSLP_2216), AL/LA1 (PSLP_2217), PSTR/PE1 (PSLP_2218), AL/PE4 (PSLP_2219), PSTR/RU1 (PSLP_2220), PSTR/SA1 (PSLP_2221), AL/SA1 (PSLP_2222), PSTR/SP1 (PSLP_2223), EN1 (PSLP_2224), EN3 (PSLP_2225), EN4 (PSLP_2226), EN5 (PSLP_2227), EN8 (PSLP_2228), EN9 (PSLP_2229), EN10 (PSLP_2230), EN12 (PSLP_2231), EN13 (PSLP_2232), EN14 (PSLP_2233), EN18 (PSLP_2234), EN19 (PSLP_2235), EN20 (PSLP_2236), EN25 (PSLP_2237), EN26 (PSLP_2238), H1 (PSLP_2239), H3 (PSLP_2240), H7 (PSLP_2241), ED1 (PSLP_2242), ED2 (PSLP_2243), ED3 (PSLP_2244), ED4 (PSLP_2245), ED5 (PSLP_2246), ED6 (PSLP_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP_2248), Policies TP1 (PSLP_2249), TP2 (PSLP_2250), TP3 (PSLP_2251), TP4 (PSLP_2252), TP5 (PSLP_2253), TP6 (PSLP_2254), OSSR1 (PSLP_2255), Appendix 4 (PSLP_2256) and Evidence Base (whole Plan) (PSLP_2257)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Given the scale of the strategic developments proposed within this Local Plan, the County Council would welcome continued engagement to ensure the funding and delivery of necessary infrastructure, within a timely manner, to support the creation of balanced and sustainable communities.

It will be critical to ensure that sites across the Borough are designed with an adequate supply of open space. Studies show the significant contribution that green spaces can provide in respect of health and well-being benefits for the public, but such spaces face increasing pressure from new development and population growth. Master-planning will need to ensure that necessary steps are put in place to protect, and provide sustainable access to, existing green spaces, and to also to ensure that new green spaces are an integral part of new development.

Waste Management

Additional development, especially within growth focussed at Paddock Wood and Tudeley Village, will place particular pressure on the waste transfer station in Tunbridge Wells. Contributions towards the expansion of essential waste infrastructure should be included within STR/SS1 under section 15 "developer contributions" and in Policy STR/SS 3, under section 12 "developer contributions".

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ashley Saunders [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ashley Saunders [REDACTED]
Comment ID	PSLP_1281
Response Date	04/06/21 13:53
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Ashley Saunders
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
All	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	Don't know
Complies with the Duty to Cooperate	Don't know

If you consider that the Local Plan is not sound, please answer this question.

Question 5

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

There is also too much proposed in such a small space. The town of Paddock Wood is getting difficult to get into and out of at the peak times of the day and many people travel to Tonbridge and or Tunbridge wells which both are heavily congested for much of the day with it being difficult to get to or from. This development would make this area of west Kent over congested which will affect the road network, transport links and could slow down emergency services responding. It would also have an adverse effect on wildlife by squeezing them out of areas in the west of the borough in which they currently thrive.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

There is much room in the eastern parts of the borough and Kent that can be looked at to help spread the load across the borough instead of bunching everyone into one corner. This would help people to travel around and also help the emergency services. It would also help wildlife too by keeping larger areas green.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Chris Sutton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Chris Sutton [REDACTED]
Comment ID	PSLP_150
Response Date	22/05/21 14:18
Consultation Point	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Chris Sutton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Background

I have lived for the past 27 years on Eastlands Lane, surrounded by open fields and right in the centre of the proposed development north west of Paddock Wood.

First comment

Proposed allocation of 126 hectares of greenfield agricultural land at Paddock Wood for development (area north of railway, west of Maidstone road)

I am surprised that there is no mention of the impact of the proposals on 1 and 2 Eastlands Cottages in the Local Plan, despite the fact that the map shows that they are squeezed into a tiny plot of land sandwiched within a massive new development on all sides. These two family homes are local heritage assets converted from a single large oast house in the 1950s, and their oast roofs are a distinctive feature of the local landscape. They sit 100m from Eastlands Farm (also known as 3 Eastlands Cottages) which sits on the other side of Tudeley Brook. Presumably these are among the properties mentioned in SHELAA for AL/PW1 where it states that “the negative heritage score reflects the land take required and thus negative impacts that would occur largely upon the setting of heritage assets.”

However, the more detailed SHELAA reports for sites 315 and 316 (the land immediately to the south and north of 1 and 2 Eastlands Cottages) states there are no buildings on the site. This is strictly true, but gives a very misleading impression as the Local Plan proposal is to develop both sites with Eastlands Cottages squeezed in between. Given the emphasis in the Local Plan that piecemeal development around Paddock Wood is unacceptable, and policies STR2 (Principle number 9) around avoiding overbearing development around existing residences and EN5 on Heritage Assets, it is unacceptable that there is no mention of any proposal of how Eastlands Cottages would be sensitively incorporated into the proposed development that would appear to completely surround it. Given this absence, I object to the development as it does not respect local residents or the local trees, hedgerows, vegetation and landscape.

The SHELAA report also has overlap between sites 315 and site 51. Why does this overlap exist? Is it in case the overall development of PW1.1 to 1.4 does not take place, and TWBC is trying to reserve the ability to develop site 51 in isolation? If so, this must be made very clear. Planning officers at TWBC will be very aware that previous versions of the Local Plan have proposed the area of site 51 for development, only to be overruled by the independent Planning Inspector who decided that the site was unsuitable for development due to flooding and other risks. The Local Plan should acknowledge this, and not only be specific on the grounds of how it will seek to develop land that the Planning Inspector rejected for development, but also acknowledge that the Local Plan causes stress for local residents who relied on the judgement of the Planning Inspector in terms of continuing to invest in their properties believing that current values, influenced by the rural setting, would be maintained. TWBC planning officers will recall the “Fight the Blight” campaign by residents of Paddock Wood living north

of the railway line to protect 51 from development in the late 1990s, on the basis that this would cut off residents of Maidstone Road, Lucknow Road and Nursery Road from access to green open spaces and can be assured that this campaign would resume if the Local Plan continues to include this site for development in the next version of the Local Plan.

The descriptions of the two overlapping sites are inconsistent. Site 315 talks of existing buildings (plural – there is only one) to the north, site 51 talks of sporadic buildings to the north. The word sporadic suggests multiple buildings, again wrong. Site 51 correctly mentions public footpath WT176 on the western edge of the site, Site 315 ignores it. Site 51 has the two word sentence “Appears Lacking” in the Site Description. What is the significance of this statement (other than perhaps to suggest that the assessment was not properly quality reviewed?). The SHELAA report for adjacent site 313 states “The site is a managed arable greenfield which appears to be in agricultural use.” What is the significance of the word “appears” here? The reality is that all of PW1.1 to PW 1.4 (except for a very tiny area at the south of site 51) has been in continual agricultural use since before the existence of Paddock Wood, first as hop fields, then as orchards, and now for more than thirty years for growing crops.

The Local Plan also fails to mention that this land is a very popular area for walkers, or how residents of Maidstone Road (north of the railway line) will be able to walk to other green areas. Eastlands Lane is a bridleway which leads from the north of Paddock Wood to Whetstead, and WT176 follows the west bank of Tudeley Brook from the railway level crossing up to the A228 where it continues into Hop Farm land on the other side of the A228. The northern edge of the field marked as 316 is also popular with walkers, enabling a circuit route around 316 which is an important open space for residents of Paddock Wood who live north of the railway line, given that the Transfesa estate provides no green walking opportunities to the eastern side of Maidstone Road. The circuit route described is accessed either from Maidstone Road or Nursery Road. The July 2018 Landscape Sensitivity Assessment for Paddock Wood, commissioned by TWBC suggests that arable agricultural land is not a distinctive feature of the Low Weald, and therefore is relatively attractive for development. Local residents beg to differ. TWBC officers might wish to consider that comments in the Local Plan which state how the Common is integral to the character of Royal Tunbridge Wells cause offense to residents of Paddock Wood when there is no acknowledgement that the greenfield land surrounding Paddock Wood is integral to Paddock Wood’s character. TWBC thereby creates an impression that the preservation of the environment of Royal Tunbridge Wells is more important than the preservation of the environment of Paddock Wood.

From the publication of the David Locke Associates map of the proposed developments at Paddock Wood, it is clear that the nearest access to open countryside (as opposed to narrow green corridors) for residents living on Maidstone Road to the north of the railway line is being moved considerably further than the current start of open space at the junction of Eastlands Lane and Maidstone Road. The nearest access to genuine countryside would now start just south of the point where the A228 crosses Tudeley Brook – this is about 20 minutes walk from the junction of Eastlands Lane and Maidstone Road. This means that residents / home workers living north of the railway line will no longer be able to enjoy a walk in the countryside in their lunch break, and thus has negative impact on wellbeing. It also means crossing a fast and busy road where the sight lines are extremely poor, which is a real deterrent to dog walkers. There are no proposals in the local plan to build a safe crossing of the A228 for walkers at the Tudeley Brook bridge.

Planners will be aware that residents living north of the railway line are disinclined to walk across the busy railway bridge to access the parks in Paddock Wood – it really is the case that the fields alongside and to the north of Eastlands Lane comprise the principal recreation area for those who live north of the railway bridge, and the local plan would obliterate this area. In so doing it also obliterates many hectares of productive arable farmland.

Section 5.231 talks of the large irregular arable fields to the north and west. It does not mention that these will no longer be a feature of the north and west of Paddock Wood if the development takes place. The David Locke map leaves no space for economically viable arable farming between the A228 and the railway line.

The David Locke map allows for two very narrow corridor views to the north. Today walkers along Eastlands Lane enjoy panoramic 180 degree views to the north, to the Greensand Ridge and further on to the radio mast north of Wrotham Heath on the North Downs, some twelve miles away. This is the only area in Paddock Wood from which people can enjoy long distance north facing views to the ridges that are so distinctive in our landscape. The plan will obliterate those views. The David Locke map allows for no views whatsoever to the south. Walkers along Tudeley Brook in the area proposed

for development can get unlimited 180 degree views south to the High Weald AONB which are not available from the Hop Farm fields in Tonbridge and Malling Borough Council further north. The grand view from the development area south ranges from Pembury to the west as far as Curtisden Green to the east, a broad ten mile vista which is not possible to see south of the railway line. All of these views are obliterated by the Local Plan. I invite the Inspector to come and see these views.

A further comment in Section 5.231 says that fields to the north west contain a mix of agricultural land uses, including arable farmland, pasture, and orchards. I invite the Inspector to come and identify any orchards to the north west of the town. There aren't any. Section 5.232 says "Ponds are common to the north west of the town". I would like to invite the inspector to come and find them. There aren't any. This illustrates the very slapdash way that the Plan has been put together, with such poor research and lack of attention to detail. It suggests that the planning team at TWBC and borough councillors have not actually visited the development site. In this and in so many other aspects, this not a sound plan.

On a related theme, there is a major problem for residents in north Paddock Wood to access the main part of the town by cycle or car to go shopping, in that there is no left turn allowed at the southern end of the railway bridge, and thus you have to drive / cycle all the way to White's Corner and then back up Commercial Road. The local plan has not considered how this road configuration would have to be seriously altered if the town centre traffic is going to be able to absorb thousands of new residents coming in to the town centre from housing developments in north Paddock Wood.

I did not comment on Flooding in my response to the local plan in 2019, but this bad issue has got significantly worse since 2019, with multiple occasions of Tudeley Brook running outwith the capacity of its banks in December 2019 and December 2020, and crossing over the top of the concrete bridge on Eastlands Lane, which has flooded 3 Eastlands Lane and caused Eastlands Lane itself to become a fast flowing stream threatening 1 and 2 Eastlands Lane. There is much talk of investment in flood protection in the new development, but a complete lack of any detail which might indicate that the planners have given any serious thought about what betterment measures they will take to address it.

Second comment

Masterplanned approach

The Local Plan makes extensive references to the concept of Masterplanned approach but there is no definition of it in the Glossary. The Local Plan simply states that Masterplanning is an enabling policy with no specific targets but progress to be monitored regularly.

It appears that the use of the word "Masterplanning" (together with words such as "Garden Settlement" and "Exemplar" which are also not defined in the Glossary) are used in the Local Plan document to create a sense that TWBC will be working with Developers to ensure exceptionally well managed development, and thereby to try to allay concerns from local residents who are impacted by the very substantial nature of the proposed developments, particularly in Tudeley Village and around Paddock Wood. But none of these words are defined in the Glossary. They are therefore assumed to be Public Relations spin. The use of Masterplanning in particular seems to be an excuse for TWBC to say "we don't need to provide detail now, because it will come later once the Local Plan has been approved".

Given the very extensive impact of these developments on the local communities, surely we should expect substance rather than spin from TWBC. We need to know now what we are being asked to support. This should include much more detail about local community involvement in the proposals.

Perhaps TWBC could point the residents of Paddock Wood to the implementation of recent developments in Paddock Wood, because presumably at least some of the concepts of Masterplanning would have been used in those? Could they perhaps cite Mascalls Grange as an example, where executive homes have been built with cesspits because the sewage infrastructure was simply not there? The Local Plan talks of the importance of good landscaping at the entrances to our communities to create a positive impression for visitors – which is absolutely not the case with steel fencing that enclosed the Badsell Road site for many months. There is absolutely no mention of the piecemeal development of the Mascalls Grange and Badsell Road sites in the Local Plan. Has TWBC not paused to reflect that the proposed additional new development will create even more concern for potential homebuyers on the current development sites? The Local Plan sets off huge alarm bells for anyone

thinking of moving to Paddock Wood, because of its lack of infrastructure and wave after wave of new development proposed by the distant Planning Office in leafy Royal Tunbridge Wells.

Perhaps TWBC could also point to the proposed community centre for Paddock Wood. The Local Plan is completely silent on the fact that PWTC arranged a ballot of local residents on whether this site was appropriate for a community centre, and the result was that local residents said no. This may be an item that TWBC feels does not strictly need to be mentioned in the Local Plan – but surely it must be mentioned in the context that TWBC are claiming in the Local Plan that local communities will be fully involved and engaged as Paddock Wood future development will be under a “Masterplanning” approach.

I understand the some Masterplanning meetings relating to the proposed developments around Paddock Wood have already started. As a local resident living right in the middle of the site I would have thought I would have been invited to participate. But no one from the Planning department has reached out to me, and I am hugely concerned at the lack of engagement to my response to Reg 18.

The reality is that over the course of successive Local Plans TWBC has subjected Paddock Wood residents to a totally disjointed, piecemeal approach, and, given residents’ experience, it stretches all credibility to suggest that TWBC Planners have got it right this time round, both with regard to design and implementation of new developments. We are told that Councillors and Officers in the TWBC have felt serious personal stress because of the challenges of working with private developers to firstly demolish and now build on the old cinema site opposite the Town Hall. Given that they know what this stress feels like, TWBC Councillors and Officers should be wary about exporting such stress to the current residents of Paddock Wood and Capel.

I concur with the views of many other residents of Tudeley, Capel and Paddock Wood that this plan is unbalanced, putting a disproportionate number of houses right on the very edge of the borough, in a way which not only passes infrastructure challenges on to neighbouring Maidstone and Tonbridge & Malling boroughs, but also does not in any way represent a reasonable share of development across all areas of the borough.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

STR/SS1 is so fundamentally unsound that it needs to go right back to the drawing board. It cannot be soundly modified by making minor modifications.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I am a resident whose house is right in the middle of the proposed development.

Local Plan Regulation 19 representations in document order

**Comments on Section 5: Place
Shaping Policies: Strategic Sites:
Tudeley Village and Paddock Wood,
including land at east Capel: Policy
STR/SS 1: The Strategy for Paddock
Wood, including land at east Capel**

Comment

Consultee	Mr Mark Airey [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Mark Airey [REDACTED]
Comment ID	PSLP_1913
Response Date	04/06/21 12:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mark Airey
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Paddock Wood for over 20 years, I work in Tonbridge and commute using the train service. My wife works in Watlingtonbury using a car to work, my teenage son is a pupil on the outskirts of Maidstone and uses the bus service to travel. We try and shop locally where possible.

Traffic in the centre of Paddock Wood is getting gridlocked despite the effects of the pandemic. For example a proposal to shut the railway bridge would cause huge inconvenience to my family and increase apprehension by being diverted through driving narrow not fit for purpose country lanes. In general, Paddock Wood roads are not sufficient for the capacity.

I am very concerned at the huge increase in housing along the railway line is going to lead to overcrowding of the trains I use which are already over capacity at times.

I am concerned at a lack of infrastructure improvements before building commencement.

I am concerned at the loss of green field sites that have been purchased and land banked for development. Paddock Wood is a very densely packed conurbation already.

Our road has seen sewerage flooding from time to time and I am concerned not enough has been undertaken to mitigate the effects of the developments in totality.

There is a significant lack of public consultation, and what little there is is of the tick box variety.

There are brownfield sites in the Borough that should be developed as a priority before green field sites.

Paddock Wood has taken a substantial over proportionate hit on developments, already approved developments increasing capacity by 30% with no improvements to the town.

Previous studies have shown a shortage of one/two bed dwellings and affordable housing stock, and the 30% increase in approved housing did nothing to alleviate that and significantly worsened it.

The roads are very narrow, and there is no cycle route from Paddock Wood to Tonbridge which I would consider travelling to work. The bus service is almost non-existent.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Graeme Anderson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Graeme Anderson [REDACTED]
Comment ID	PSLP_1033
Response Date	03/06/21 10:29
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graeme and Tina Anderson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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We have lived in the parish for more than 25 years. The land subject to these plans is Green Belt land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel. This can avoid coalescence and the creation of a conurbation from Paddock Wood right across to Tonbridge. This land operates as a flood plain and is simply unsuitable for the proposals.

The lack of action taken by TWBC since the Reg 18 consultation, is laughable, but wholly predictable.

Creating a settlement at East Capel of an unsustainable number of new houses will cause immense harm to residents of the Parish of Capel and to residents of Paddock Wood. There will be a significant increase in traffic in to both Paddock Wood and Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every morning. Which schools will the children of this development be expected to attend? Whether it is Mascalls in Paddock Wood, or the new school in Capel they will need to be bussed there or driven in private cars as there is no safe footway on the B2017 in either direction, and not enough land at the side of the road to create one, for the majority of the distance.

People living in East Capel will use either Paddock Wood Station or Tonbridge Station for commuting and either Paddock Wood or Tonbridge for services that will need more parking. The increase in traffic will be more than Paddock Wood and Tonbridge can cope with. Their roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Paddock Wood and Tonbridge Station will be unsustainable. Parking in and around Paddock Wood and Tonbridge Stations will be even more difficult.

The impact on traffic using the A228 between Pembury and the Hop Farm, in particular the Colts Hill section, will be unsustainable. It takes very little already for the traffic to become backed-up on this stretch of single carriageway.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Our personal observations are that in the twenty-five years in which we have lived here, the water table has got significantly higher. Now, even in high summer, after weeks or months of dry weather, the soil remains sodden just below the surface. Flood mitigation measures may help, but we believe that flood risks will increase. Covering farmed fields and woodland with houses and roads will make the consequences of Medway flooding more severe and cause increased flood risk not only in East Capel but in Five Oak Green and Paddock Wood.

As with Tudeley, creating so much housing in East Capel will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food. Please look again at brownfield sites in the borough - of which there are many - and explain honestly, why destroying Capel is preferable to using them first.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Juliet Andrew [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Juliet Andrew [REDACTED]
Comment ID	PSLP_936
Response Date	02/06/21 16:49
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Juliet Andrew
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Map 28	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a resident in Queens Street Paddock Wood and have lived here since 2010. Since the new developments in Mascalls Farm the traffic has already increased considerably since we have lived here. Further down Queens street bridges over the railway lines. These are effectively single lane and there has already been an increase of road traffic accidents since the Mascalls development due to the high volume of traffic travelling over these bridges and on the bends either side.

Our house flooded December 2013 from the downwards journey of the water across the neighbouring concreted yard of the farm adjacent to us. It was able to flow through our house and disperse into the lower ground which is currently apple orchards. This will not be able to happen once the land is developed.

We appreciate the government has a housing target to meet, however we strongly object to the disproportion allocation of development in Paddock Wood. Out of an overall housing target of 12000 dwellings. Paddock Wood is currently being allocated approximately 4000 of these, approximately 1/3 of the total borough's allocation. If we include our neighboring villages, Capel and Tudeley figures our joint allocation is over 6000 dwellings over half of the boroughs target. There are brown belt sites in the borough and also locations near the longfield site that are better suited to mass development with better transport links and community services.

an economic objective— to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

Developing housing in Paddock Wood does not improve the local economy. There is no specific industry in the area and despite the rail link with London, the trains are unaffordable for many, overcrowded in peak times and insufficient parking for commuters. (Cost for annual season ticket to mainline terminals plus annual parking ticket is over £6K, however there is a waiting list for parking season tickets due to the lack of spaces).

There are limited options in terms of traffic management around the area. Many of the roads are narrow and unable to be widened due to the flood management ditches and the railway bridges. (We have confirmation from Network Rail that they will not be widening bridges to support more road traffic).

The current services such as our doctors, dentists and schools are over subscribed. The local police centre has been sold off for development and therefore we would like evidence that these services including the fire services have realistic plans to be sufficiently scaled to meet the additional demands of an increased population.

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

Our experience so far is that our community high street is to be demolished to make way for further development. This is despite the opposition raised by the local community and the rationale of building a new community centre on green space instead of extending our local sports and leisure centre and turning that into a proper community hub rather than a tired sports hall with very little to offer the youth community of Paddock Wood.

The current new housing itself has been built on land that is subject to flooding. There are flood mapping plans that provide evidence of this. The long term strategy in previous developments around Paddock Wood has been to leave some areas of land for drainage however these have no long term maintenance strategies and in some cases have now been developed. It is clear these strategies are not working as residents across many parts of Paddock Wood are being flooded.

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimizing waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

The development of the Church Farm site has already demonstrated the lack of respect for our natural environment. Trees that were subject to planning consent were ‘inadvertently’ destroyed by the developers.

As mentioned already flooding is of a major concern across Paddock Wood. As a resident on the East side of Paddock Wood our road has been subjected to severe flooding. Residents have had to purchase their pumps due to regularity of flooding down Castle Hill, Mile Oak Road and Queens Street. We are currently surrounded by apple orchards and they are assisting to disperse the run off but if these are developed the situation will be exacerbated.

We would also like to understand if Natural England have been consulted regarding the development proposals as required with a development of more than 20 hectares prior to planning approval. The government policy is to protect the best and most versatile (BMV) agricultural land from development. The proposed areas for development (Paddock Wood, Capel and Tudeley) TBWC are the most likely to meet this criteria:

Namely the agricultural land

- . gives the highest yield or output
- . has the widest range and versatility of use
- . produces the most consistent yield from a narrower range of crops
- . requires less input

and this is evidenced by our neighboring farm consistently and successfully growing asparagus and apples and other crops.

[1] <http://publications.naturalengland.org.uk/publication/6056482614804480>

Coupled with this is the government recently announced [1] to see hundreds of thousands of new trees planted, including in towns and cities and near rivers to reduce flood risk, and help meet the government's commitment to increase planting to 30,000 hectares per year across the UK by 2025.

A further £1.4 million has been awarded to the Environment Agency to fund ‘woodlands for water’ – 15 projects to plant over 850,000 trees that will protect around 160km of river and help to reduce the risk of flooding to over 500 properties.

Tree planting can play a valuable role in reducing flood risk, slowing the flow of water to nearby communities.

It would seem that removing trees by developing our local orchards is counter productive to government policy.

[1] <https://www.gov.uk/government/news/39-million-to-drive-innovative-tree-planting>

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

. I would suggest that the development across TBWC in more equitable therefore alleviating Paddock Wood from the issues raised above specially:

Development of arable land when the government has specifically stated that farming must be preserved in the UK. - In other words there are other options in Tunbridge Wells that do not consist of developing farming land

Do not build on the orchards which is contrary to the government directive to plant more trees

Do not create an over populated area around Paddock Woods with poor infrastructure, transport links and public services and little job prospects.

Do not increase the flooding in and around Paddock Wood due by concreting the countryside.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lynne Assirati [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lynne Assirati [REDACTED]
Comment ID	PSLP_271
Response Date	29/05/21 16:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Lynne Assirati
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am objecting to Policy STR/SS 3 because I believe it is inconsistent with TWBC policies STR 5

(Infrastructure and Connectivity), STR 6 (Transport and Parking), STR 7 (Climate Change), STR 8 (Conserving and Enhancing the Natural Built and Historic Environment), STR 9 Green Belt and EN 25 (Flood Risk).

My name is Lynne Assirati and I live in Alders Road, Capel which has flooded on a number of occasions, most recently in February 2020 which took a year to recover from. Together with my husband and neighbours we run the Capel Path Rangers group which was set up to ensure that all the footpaths within the parish are well maintained and I greatly appreciate being able to walk in such lovely countryside with outstanding views. We also run the Friends of Capel Church which is dedicated to maintaining the fabric of this ancient church and welcoming the many thousands of visitors who come to view our medieval wall paintings. Finally, I organise the village litter picks. I am therefore writing to object to "The Strategy for Tudeley Village" (Policy STR/SS 3) for a number of reasons but primarily because it will increase flood risk, will ruin a huge swathe of our beautiful countryside, and the proposed new road will increase noise pollution and destroy the peace and tranquillity of our lovely church yard which is much used by many locals for a place to come for a few quiet moments away from the bustle and business of our frantic lives. Increased pollution will damage the fabric of the building and thousands more people living in this area will increase litter to a disastrous level. We already get very little support from TWBC to keep our lanes clean and I don't anticipate there will a change in policy any time soon.

Creating a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. There will be a significant increase in traffic in to Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every day especially at peak times.

It is naive to believe that the people who will buy these houses will already be living locally. Many, many will come from London seizing the opportunity to get a larger house for the same money and have access to grammar schools. People living in Tudeley New Town will therefore use Tonbridge Station for commuting and Tonbridge town services and that will require more parking. The increase in traffic will be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period. It may be the case that more people will work from home for part of the week but we should be in no doubt that the pressure on the roads, the trains and car parking will still increase and this pressure is already at an unsustainable level. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle

use. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer. We understand that Tonbridge councillors are unhappy about the TWBC proposals and there is not as yet a statement of common ground between the authorities as required by the NPPF.

There will of course be impact on Tunbridge Wells where there will be even longer queues at A&E, increased pressure on the police service, more accidents on the inadequate roads.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary into Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows). Here again, the peace and tranquillity of this very special place will be destroyed and increased pollution will cause irreparable harm. This is a Grade 1 listed building and I would remind you that as such Historic England regards the setting as extremely important.

The garden settlement at Tudeley can never be one settlement as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food. Indeed, with the latest statistics on climate change it is imperative that we preserve and use every acre of agricultural land including the orchards for which this area is so famous. We need to become self-sufficient.

I believe that housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. TWBC is already providing more than their housing need figure in the draft Local Plan. TWBC has taken the housing need figure of 13,560 given to them by government and upscaled it to 14,776 despite having strong grounds to lower it due to the large amount of Green Belt and AONB land in the borough. Taking 1,216 (the upscale) from the 2,800 planned for Tudeley and then asking the government to allow the housing need to fall by 1,584 to factor in the lack of "exceptional circumstances" for building on Green Belt land, would be a much better approach. Recent ONS figures show that population growth in the borough is slowing, making this proposed approach honest and relevant. I repeat the only exceptional circumstances are that most of the borough is in an area of Outstanding Natural Beauty or is designated Metropolitan Green Belt and as such the government accepts that housing needs can be curtailed. One can only wonder what is the motive for TWBC to persist in going ahead with this very unpopular scheme when they so obviously don't need to?

Earlier in the plan (in 4.40) they refer to Tudeley Village securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that they intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans. I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge.

It is significant that there was an overwhelming rejection of the plan at Reg 18, but none of the objections made have been recognised by TWBC, and no changes to the plans for Capel have been made in Reg 19, except to increase the number of houses proposed. This is not local democracy, and shows that the Council are determined to push through their plan against the wishes of the local population.

Question 6

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I believe that the land in East Capel in the Paddock Wood Strategy (SS 1) should be removed from the plan, and TWBC should use more brownfield sites and empty retail space elsewhere in the borough for housing. Instead of building on Green Belt land that they assess themselves will cause HIGH harm to the Green Belt they should look again at non-Green Belt land including the area to the east of Paddock Wood. If necessary they should explain that they cannot meet the governments indicative targets due to the Green Belt constraints.

In the Daily Telegraph of 14th October 2019 the head of the CPRE said that building on Green Belt land is not solving the need for homes because the wrong sort of homes are being built. What is needed is true low cost homes for those who are currently truly homeless – the people who are living on the streets and in hostels as identified by the Heriot Watt survey of 2014 and young people in general who are forced to continue to live with their parents who cannot afford to rent or buy the small number of so-called low cost homes that it is proposed to build here and they certainly don't want to be living miles away from the town centres. So, forcing every new housing development to build a few low cost houses or flats doesn't solve anything. What will help is converting empty shops in the centre of our towns into residences and will revive our high streets as well. And after this pandemic is finally brought under control, there will be plenty of empty shops in all our local towns. In Europe every medium and large town has built blocks of flats no more than 10 storeys high, often in the centre, which is exactly the sort of accommodation that meets these people's needs and has managed to blend them in so well that you hardly notice them. There are plenty of brown field sites in Tunbridge Wells, Maidstone etc. where this would work well. There is also an alternative site at Castle Hill, still within our parish and regrettably within an AONB but because of the nearby industrial estate and the busy A21, which would actually blend in much better with its current surroundings and impact on no-one. Build here and no-one will flood, no precious agricultural land will be destroyed and no new roads will be needed.

Since his election in 2019, our Prime Minister has stated publicly more than once that it is a major aim of this government to eradicate the north/south divide and create a more equal society. In order to achieve this, businesses must be encouraged to move to other parts of our country, away from the south-east. If this is truly the desire of our government they will offer incentives to both businesses and citizens and then people will follow the jobs. The pandemic has demonstrated that people can work from home anywhere. How long before these homes are left standing empty as people move to areas where housing is cheaper, there are plentiful jobs and there are still the green spaces so important for their health that we will have been deprived of?

My husband and I, and my neighbours have chosen to give up the benefits of living in a town with all its various amenities, good phone connections, easy access to shops, transport links etc. in favour of living somewhere we can breathe clean air, enjoy the changing seasons and the lack of crime. We work hard to protect our environment for future generations and put up with the fact that we don't get value for money from our council tax but have pot holes that are not filled in, litter mounting at the side of the road etc. If you impose thousands of people on us, all that will be lost.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Robert Assirati [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Robert Assirati [REDACTED]
Comment ID	PSLP_274
Response Date	29/05/21 15:08
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Robert Assirati CBE
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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POLICY STR/SS 1

I am objecting to the inclusion of land in East Capel in “The Strategy for Paddock Wood” (Policy STR/PW1).

I am a retired civil servant living in the Parish of Capel. I spent my career managing and reviewing major government projects, working latterly for the Cabinet Office and HM Treasury. I was Deputy President of the British Computer Society and an Honorary Fellow of the Association for Project Management. I am still invited by the Government to review their Major Projects for deliverability and value for money several times a year.

Locally I chair the Capel Path Rangers who look after local rights of way, and also chair the Friends of Capel Church. I am a Trustee of Registered Charity 1192171 Capel Greenbelt Protection Society which seeks to protect and improve the local countryside and help local people make use of and enjoy it.

I chose to live in this area because of its rural nature, with beautiful views over the Medway valley and opportunities for walking the network of footpaths and the towpath along the River Medway. I took account of the fact that my house is in both the Metropolitan Green Belt and an Area of Outstanding Natural Beauty and regarded this as a guarantee by government policy that I would not be subject to uncontrolled development. How wrong I was.

Like SS 3, this land is particularly prone to flooding, as it is part of the Medway Valley flood plain. The infrastructure is inadequate throughout the area and Paddock Wood itself regularly floods with both surface water and sewage. There are no plans to upgrade the sewage facilities for the town, which this expansion will only exacerbate.

This land is also Green Belt land and should only be built upon if an “exceptional circumstance” exists. TWBC’s own assessments in their Sustainability Appraisal show that Paddock Wood can expand to the South and East and meet most of the plan’s aims without using the Green Belt land at East Capel.

Together with the proposals for SS 3 the result will be an almost unbroken built-up area running for ten miles from the north end of Tonbridge to the east side of Paddock Wood, exactly what the Green Belt is meant to prevent. TWBC’s own Green Belt Study concludes that building at Tudeley and East

Capel will each do a HIGH degree of harm to the Green Belt, even though they claim that these large developments will not contribute to the merging of the built-up areas of Tonbridge, Five Oak Green and Paddock Wood.

Successive Ministers for Housing and Communities have stated that protecting the Green Belt is a Government priority, and this was reiterated in the Conservative 2019 election manifesto. In June 2019, Boris Johnson said “*We should not be imposing targets on councils that they are simply finding impossible to meet without building on the Green Belt, so we have to be much more sensitive in what we are doing*”. But that was before he became Prime Minister.

The previous leadership of the Borough Council have steamrolled these plans through against the wishes of the local population, expressed in the unprecedented volume of objections to the Draft Plan Reg 18 in 2019. With a large majority and a stranglehold on the Conservative councillors, the Leader insisted on chairing all the decision-making bodies – Planning and Transportation Cabinet Advisory Board, Cabinet and full Council Meeting, a process that ignores the normal balances in the process. The approach is highly unpopular and has resulted in major U-turns under pressure from local people, such as the waste of £10 million on a vanity project for a new theatre (now dropped) and the failure to redevelop the prime cinema site in the centre of the town for the last 20 years. A concerted campaign to highlight the undemocratic processes and achieve a change in leadership resulted in the Conservatives losing their overall majority and the Leader being removed. We can only hope that the new Council proves to be more democratic.

Question 6

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I believe that site STR/SS 1 should be removed from the plan. Alternative non-Green Field sites should be pursued, together with greater attention to brownfield sites. If necessary TWBC should state that they cannot meet the Government’s indicative housing targets because of the constraints of Green Belt policy.

As a professional project planner, I find that the process for developing this plan has been faulty both in the completeness of the analysis and the lack of community involvement. There are so many shortfalls in the plan, especially with regard to the viability of SS 3 that the Council should abandon this aspect of the plan and seek realistic alternatives such as the greater use of brownfield sites and should consider apartment blocks, possibly above new shops and commercial premises as a way of providing true low cost housing to meet local needs. To continue with unrealistic proposals will waste taxpayers’ money.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr G Ayers [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr G Ayers [REDACTED]
Comment ID	PSLP_225
Response Date	19/05/21 12:00
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Other
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mr G Ayers
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 1 The Development Strategy

Policies PSTR/SS1, PSTR/SS3 & PSTR/BM1

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

.	It is not effective
.	It is not justified

Question 5

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Section 5 – comments

The comments below focus on the integrity and how sound the Local Plan (LP) has been assembled, having regard to its overall deliverability. In affect, not necessarily questioning its constituent parts (although some of these inevitably come into question - notably the sheer scale of new housing projected without corresponding highways infrastructure improvements) but how sound the thinking has been applied to knitting these together to achieve the overall strategic outcome for the Borough? In so doing, this is not merely looking at the results at the very end of the Plan Period after some 15 years but critically :-

i) at the very dawn of implementation in 2022 and

ii) followed closely in the formative years of its implementation (circa 2022 - 2028) when in stark contrast, unparalleled numbers of new homes (Expected Completions within Plan Period table) are being planned and yet highway infrastructure, classified as 'critical' by TWBC themselves, necessary to unlock the housing development, is worryingly not implemented until beyond year 10 into the overall 15 year plan period thereby leading to:-

- 1 increased volume of residents in the Borough which in turn multiples car usage exacerbating congestion, &
- 2 as a consequence, a reduction in air quality; &
- 3 a detrimental impact on the environment and residents well being in those parts of the Borough most effected during the transition phase.

Whilst recognising pressures and concerns by residents elsewhere in the Borough, the comments below focus on the impact locally to the Parish of Brenchley and Matfield even though many of the problems to be encountered arise outside of the immediate vicinity of the two villages.

There are three key areas to consider - housing, highway infrastructure and air quality. The thrust of the problem is that at no stage in the Local Plan, does it appear that deliverability has been baselined against existing conditions? For example, have the key highway routes to unlock the 'sustainable' housing developments been modelled against *origin & destination* traffic criteria to establish the extent of spare capacity on the **existing** highway network?

Further, to what extent has TWBC demonstrated how deliverable the Local Plan is under scrutiny? particularly at the interplay between the sizeable local housing development along with the A21 and A228 infrastructure improvements required to unlock them?

It is evident sections of the LP have been 'reviewed' individually but less apparent is the extent to which TWBC has undertaken due diligence and executive scrutiny to the critical path weaving its way through spine of the Local Plan? Without a CPA (Critical Path Analysis) or simple bar chart, it is impossible to form a view as to how deliverable or robust the LP is in this sense? Not the minutiae or stand alone

subjects but the big bite sized bits of the Local Plan that have undeniable strategic links and dependencies with each other.

One of the tests for soundness within NPPF (National Planning Policy Framework) is whether the Local Plan is Justified, or not. To support this an acceptable LP should contain " ... *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*"

I cannot claim to have read every section of the Local Plan but I am convinced that there is little to no evidence that supports the the LP is based upon proportionate evidence. Similarly, I have no feeling studying the LP, that the strategies adopted are underpinned by any number of various alternatives options. Surely if such alternative scenarios had been interrogated and contrasted in the LP, it would illustrate the current version as the preferred option.

Moving from generic commentary to specifics, my doubt to the soundness of the LP looks at the strategic interplay between the three subject groups below and the impact specifically on Brenchley and Matfield Parish (BAMP) along with nearby Paddock Wood:-

- . The order of magnitude increase in new housing for Paddock Wood, Capel Garden Village and BAMP, generating more traffic leading to congestion and lower air quality on 82160 running through Matfield; and
- . The impact of extra traffic through Matfield until such time as Highways England acquire ring fenced funding for the £1.5m in their 10 year capital programme to implement the enhanced A21 highway & roundabout modelling planned at Kipping Cross and Blue Boys; plus
- . The impact of extra traffic through Matfield (and surrounding village / rural areas) until such time in the future financial contributions from housing developers (via S106, CIL etc) achieve the £20 million necessary to fund the new A228 Colts Hill bypass works.

Item

Hazard

Risk

Consequence

Increased housing and number of residents at Capel Village, Paddock Wood and Matfield

Extra residential car journeys made by new residents within the Boroughs hotspots and extra HGV's continuing to use B2160 & avoid the dedicated HGV A228 route to join A21

1) additional vehicle trips heading to & from A21 Kipping Cross

2) HGV's continuing to avoid designated HGV route up A228 Colts Hill due to congestion at and poor junction configuration to join the A21

1) Vehicular congestion backing up from Kipping Cross into Matfield village, especially during summer and peak times of the day

2) Additional vehicle traffic and HGV's using B2160 through Matfield village

3) lowering of air quality 4) lowering of residents wellbeing, health and increased journey times.

For the first 6 years, the Boroughs' housing projections (Expected Completions Within Plan Period - Housing Supply and Trajectory Topic Paper for the Pre-Submission) are at the highest level across the whole of the Plan Period to 2038. Yet, the highway infrastructure deemed critical (Infrastructure Delivery Plan) by TWBC themselves to address 1) existing baseline transport problems and 2) unlock the spatial needs for projected housing targets " does not reach even the feasibility/ planning stage until at least year 10 of the 15 year programme (10 years for A21 and beyond year 10 for A228 Colts Hill bypass).Q - what happens to transport congestion, environment, air quality and residents health during the first 10 years of the Local Plan when this critical highway infrastructure is not available?

Q - do the contributions and improvements made in latter years exceed the detrimental impact upon residents wellbeing in the first 10 years?

Under Section 3:Vision and Objectives the following statements are made by TWBC :-

Vision - "general concerns about the infrastructure capacity " ...

Vision and Strategic Objectives 1 - Vision " and supporting infrastructure will be **achieved over the plan period** (this claim reinforces a lack of deliverability during the plan period.) " and under Local ambitions: for Paddock Wood with timely infrastructure provision'

Vision and Strategic Objectives 2 - " To achieve the timely delivery of all forms of infrastructure that meets the needs of development... .. "

How and **when** the Local Plan assures residents these bold claims are supportable not clear, especially when housing is forging ahead in the early years and hard infrastructure doesn't emerge until 2/3rds of the plan period has passed.

Question 6

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Section 6 - Recommendations for update to Local Plan

Scale and rate of additional housing plus realisation of A21 and A228 highway improvements

Recommendation 1 - Housing development

- . explore to what extent the volume of new housing developments between 2022 and 2028 can be skewed to later in the plan period until such time as A21 and A228 highway improvements are realised.
- . Tailor housing development projections to meet existing A21 and A228 highway capacity until future improvements of A21 and A228 fully funded and implemented.

Recommendation 2 - Traffic modelling

- . using traffic modelling against housing projections and locations, quantify the existing spare highway capacity available on A21 (Kipping Cross and Blue Boys) and A228 to establish if the extra generated journeys made by new residents (in formative LP years) are tenable, or not.
- . enforce dedicated HGV routes to service new housing development sites
- . Undertake HGV traffic study at junction of B2017 and A228 to establish why, as the KCC preferred HGV route, instead of continuing up Colts Hill A228, HGV lorries divert through Matfield along B2160 to join A21.

Recommendation 3 - Highway Infrastructure

- . Notwithstanding LP safeguarding, explore alternative measures to secure gap funding (reference is made within the LP) A21 & A228 improvements in order to pull forward and thereby retain existing LP year housing projections in the early years 2021 - 2031.
- . Ensure A264 Pembury junction **and** A228 Colts Hill bypass improvements are dealt with holistically as one overall highway improvement solution.
- . Explore traffic calming technology and improved pedestrian safety in Brenchley and Matfield villages.

Recommendation 4 - Air quality

- . adopt air quality monitoring points between 1) The Star and The Poet on B2160 Matfield, 2) A21 Kipping Cross and 3) Eldon Way and Rosemary PI B2160 at Paddock Wood.

Recommendation 5 - National Planning Policy Framework

- . Along with any supporting evidence trail, highlight to what alternative scenarios have been considered in drafting the LP and methodology employed leading to the option selected in the current version of the Local Plan.

- . Demonstrate how TWBC have assessed the Local Plan as 'deliverable' , what they identify as tier 1 unavoidable adverse impacts to residents, businesses and visitors and the mitigation measures (or compensatory measures) to be adopted.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Elisabeth Baker [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Elisabeth Baker [REDACTED]
Comment ID	PSLP_1068
Response Date	03/06/21 12:44
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Elisabeth Baker
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in the same house in Paddock Wood for 45 years. It used to be a beautiful and useful town. The fields and countryside were lovely and it felt very rural; now the entire town is a mass of developments. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy.

As the town expands the current flooding will only get worse as trees, hedges and drainage ditches are removed or replaced by housing estates. Traffic is terrible, particularly during rush hours and school drop-off/collection times. East Capel is a small village; it doesn't have the schools, shops, doctors or road infrastructure to be able to take on anything like this size of over-development. It will ruin the current village. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ben Ballard [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Ben Ballard [REDACTED]
Comment ID	PSLP_1026
Response Date	03/06/21 09:55
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Ben Ballard
Question 2	
Agent's Name and Organisation (if applicable)	N/A
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Paddock Wood	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Five Oak Green for a little over 6 months and in this short time my observations are that the local community and facilities are already fully stretched. Traffic levels are very high and steadily increasing. There is already a daily problem with illegal parking on the high street, on double yellow lines, on the pavement and within the confines of pedestrian crossings. The BADSELL ROAD and WHETSTEAD ROAD have a constant stream of vehicular traffic and much antisocial driving including speeding and excessive noise.

It is nigh on impossible to get an appointment with the local Doctor's surgery and other local facilities are already at capacity.

The proposal would constitute inappropriate development within the Metropolitan Green Belt, which by definition is harmful to its openness.

It would not conserve and enhance the rural landscape, nor would it protect the countryside for its own sake, nor preserve the interrelationship between the natural and built features of the landscape. The overall impact is harmful to the rural character of the area.

The proposed development is likely to result in a risk to human life from flooding and is contrary to policies EN18 of the Tunbridge Wells Borough Local Plan 2006 and Core Policy 5 of the Tunbridge Wells Borough Core Strategy 2010, guidance in the National Planning Policy Framework 2018 and the Planning Practice Guidance

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_136

Comment

Agent	Mr Jonathan Buckwell ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	DHA Planning Ltd
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Consultee	([REDACTED])
Company / Organisation	Barth-Haas UK Ltd
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Barth-Haas UK Ltd ([REDACTED])
Comment ID	PSLP_2019
Response Date	03/06/21 12:06
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	DHA Planning for Barth-Haas-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Barth-Haas Uk Ltd
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: the full representation attached has been divided into Policies STR/SS1 (PSLP_2019), STR/SS2 (PSLP_2020), Policy ED2 (PSLP_2021), Vision and Strategic Objectives (PSLP_2022), Policies STR1 (PSLP_2023), STR3 (PSLP_2024) and STR4 (PSLP_2025)]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Barth-Haas UK Ltd (herein 'BarthHaas') in respect of the Tunbridge Wells Borough Council Pre-Submission (Regulation 19) Local Plan (PSLP) consultation.

1.1.2 These representations relate to BarthHaas' existing site at Hop Pocket Lane, Paddock Wood.

1.2 The site

1.2.1 The site comprises the Barth Haas UK headquarters and production facility, which is located east of Hop Pocket Lane in Paddock Wood.

1.2.2 Barth Haas UK forms part of the Barth Haas Group – who are the world's largest supplier of hop products and services. It operates across all continents and provides support to its customers and partners throughout the production and sale cycle. This includes research and development, breeding /growing and marketing. As is recognised in PSLP paragraph 5.236, Paddock Wood evolved around the production of hops, and so as a company who continue to trade in hop products, BarthHaas provides an important link with the history of the town, as well as being an important local employer in its own right.

1.2.3 Our client is currently considering options to expand their facilities. This is likely to require relocation, with an alternative location in or close to Paddock Wood preferred, which will then free up the site. The existing premises are dated and no longer suit the needs of modern businesses – especially being an imposing five storey building – it is likely that the site would need to be redeveloped in order to be attractive to future occupiers.

1.2.4 The extent of the site is shown in Figure 1 overleaf.

[TWBC: for Figure 1: Site Location Plan see full representation attached]

1.2.5 The site was promoted for development through a response to the Regulation 18 consultation draft Local Plan.

1.2.6 The site is very close to both the town centre and the railway station, the latter being accessible via a pedestrian access point immediately south of the site.

1.2.7 The site was assessed by the Council as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA). This concluded that the site could be suitable to be redeveloped to accommodate between 40 and 140 dwellings. The SHELAA concludes that the site is suitable, available and deliverable for such a use, and is in a sustainable location. It is therefore suitable to be allocated for this form of development.

1.2.8 Strategic Sites Masterplanning and Infrastructure Main Report paragraph 4.152 also recognises that some other town centre uses (e.g. retail and leisure) may also be appropriate in this location.

1.3 Local Plan Background

1.3.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.3.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3.3 This submission comments on the plan having regard to these tests of soundness as well as wider legal compliance.

1.4 Legal Compliance

1.4.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.4.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.4.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.5 Assessment of Soundness

1.5.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough.

It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.5.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.5.3 This representation comments on the following elements of the plan:

• Vision and Strategic Objectives; • Development Strategy and Strategic Policies; • Place Shaping Policies; and • Development Management Policies.

Place Shaping Policies

1.5.15 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

Policy STR/SS1

1.5.16 Policy STR/SS1 sets the detailed strategy and states, amongst other things:

[TWBC: PSLP wording of Policy STR/SS1 and Extract of proposed proposal map for Paddock Wood have been duplicated here - see full representation attached]

Comments in relation to Hop Pocket Lane

1.5.17 BarthHaas **SUPPORTS** the inclusion of the site within Paddock Wood strategic growth area, and its identification within the Strategic Sites Masterplanning and Infrastructure Main Report, where it is shown on the concept plans at Figures 6 and 10 as forming part of the town centre. Its identification as a development area on Map 28 in the PSLP is also supported.

1.5.18 My client confirms that in relation to this site, it is deliverable for residential-led development, potentially including some retail and/or leisure uses too, over the plan period. My client welcomes the strategic employment proposals for the town, which will help to deliver additional high quality employment in the manner envisaged, including a mix of employment types and sizes in order to support the balanced economic and employment growth of Paddock Wood.

1.5.19 In particular, my client **SUPPORTS** the inclusion of the Hop Pocket Lane site within the proposed Policy STR/SS1 allocation and similarly its exclusion from the protected employment area.

1.6 Summary and Conclusions

1.6.1 In summary, this representation has been prepared on behalf of BarthHaas in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.6.2 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, and especially the identification of the existing BarthHaas site as being suitable for residential-led development.

1.6.3 However, we object to the wording of Policy ED2 for the reasons set out above.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_97

Comment

Agent	David Murray-Cox [REDACTED]
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Company / Organisation	Turley
Address	[REDACTED] [REDACTED] Reading [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Bellway Homes Strategic
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Bellway Homes Strategic [REDACTED]
Comment ID	PSLP_1755
Response Date	04/06/21 12:23
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	<u>PSLP_1747-1748, 1750-1756, 1758_Turley for Bellway Homes Representation Redacted.pdf</u>
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Bellway Homes Strategic
Question 2	
Agent's Name and Organisation (if applicable)	Turley
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: for further comments by Bellway Homes Strategic, please see Comment Numbers PSLP_1747-1748, PSLP_1750-1756, PSLP_1758]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

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Question 5

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TUNBRIDGE WELLS PRE-SUBMISSION LOCAL PLAN – REPRESENTATIONS ON BEHALF OF BELLWAY

We write on behalf of our client, Bellway Homes Strategic, in relation to the Pre-Submission draft Local Plan for Tunbridge Wells Borough which is currently subject to public consultation. This letter provides the background to Bellway's interest in the Borough and sets out representations on their behalf.

BACKGROUND

Bellway has a legal interest in the land to the north and south of High Woods Lane (Mouseden Farm) on the eastern edge of the built up area of Tunbridge Wells/Hawkenbury which it is promoting for residential led development. The site is separated by High Woods Lane. The area south of High Woods Lane is currently in agricultural use and bordered to the east by woodland, to the south by existing sports uses and to the west by existing residential development. The area north of High Woods Lane is also within agricultural use, with further agricultural uses/woodland to the east and an indoor bowls club and allotments to the west.

The adopted Proposals Map indicates that both parts of the site are within the Green Belt and AONB.

On the basis of the Proposals Map published as part of this consultation indicates that the southern part of the land (south of High Woods Lane) is to be designated under Policy RTW1923 with that area to adjoin the 'Proposed Limited to Built Development'. The northern part of the land promoted by Bellway is not subject to any other proposed allocations. The draft Proposals Map appears to indicate that both parts of the site will continue to be located within the Green Belt and AONB.

Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

The draft Local Plan proposes 3,490 – 3,590 dwellings at Paddock Wood (in Paddock Wood and Capel parishes). We have set out comments on the deliverability of this site elsewhere in these representations

and reserve the opportunity to comment in greater detail if this site is retained in subsequent versions of the Local Plan.

We note that this site is acknowledged to be subject to a number of specific constraints, including land being within Flood Zone 3. This Local Plan consultation does not appear to be supported by any material which explores or demonstrates how the quantum of development (residential and other uses) and associated infrastructure can be accommodated within the site.

It is clear that the policy sets a complex and complicated level of requirements which will take time to address before any permission can be granted and in combination with the need for infrastructure delivery, demonstrates the need for caution to be exercised in relation to the site's overall delivery.

SUMMARY

These representations set out **significant concerns** regarding the draft Local Plan for Tunbridge Wells Borough. In summary, the level of housing required to address issues of affordability and does not provide any realistic opportunities to make a meaningful contribution to meeting affordable housing needs. Whilst the Council claims that the housing supply represents a buffer over the planned requirement, this is based on extremely optimistic assumptions and short lead in times before the key sites deliver. In the case of Paddock Wood the Plan then relies upon very high delivery rates.

A more diverse and greater range of sites are required to address affordability, provide affordable housing and to help ensure that the housing requirement is achievable.

The Plan also provides a disproportionately low level of new housing at Tunbridge Wells despite the sustainability of this settlement, in comparison to other, less sustainable locations. This is borne out by the selection of the Tudeley Village site as a location for a new garden village in a remote location where the extent of measures to support sustainable travel is extremely unclear. Alternative options are available which would direct development to the most sustainable settlement (i.e. Tunbridge Wells) and which are in sustainable locations.

This conclusion is supported by the Council's own evidence which demonstrates the availability and suitability, sustainability and logic of alternative sites on the edge of Tunbridge Wells (including the land promoted by Bellway which is subject to these representations).

The Council's own evidence has overstated the contribution that certain sites, including the land promoted by Bellway which is subject to these representations) makes to the Green Belt. When the land is assessed in a more robust manner (and when assessed independently rather than as part of wider Broad Areas), the contribution is significantly reduced.

The southern part of the land promoted by Bellway (i.e. the land south of High Woods Lane) is subject to a planning permission for recreational uses. That application was submitted by the Borough Council, despite it having no interest in the land. In contrast, Bellway has a legal interest in the land and is promoting this area, as part of a wider site, for residential development. Bellway would be willing to work with the Borough Council to explore opportunities for bringing forward the approved recreational facilities in the area, which residential development on the site could help deliver.

Whilst the Council is pursuing (by allocating and seeking planning permission) land outside of its control for sports and recreation uses, it is concurrently planning to release a number of sites which are already within those uses for residential development which the Council does own. As a matter of general principle this approach appears unjustified.

As it is currently drafted the Local Plan is unsound. It relies on unsustainable and undeliverable solutions to housing needs and is partly premised on releasing the Council's own land for housing whilst proposing land it does not own for compensatory sports and recreation purposes. These fundamental issues of unsoundness are compounded by a lack of documentary evidence to explain why the Council has selected the approaches and proposed allocations in the emerging Local Plan.

Bellway would be willing to enter in to dialogue regarding the land north and south of High Wood Lane and the extent to which this site could deliver housing (delivering the greater range and diversity of sites) in a sustainable location. Bellway would be willing to discuss the manner in which such housing could assist in delivering additional recreational facilities in the area.

[TWBC: for full representation, please see supporting documents]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1747-1748, 1750-1756, 1758 Turley for Bellway Homes Representation Redacted.pdf](#)

Supporting Information File Ref No: SI_90

Comment

Consultee	[REDACTED]
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Company / Organisation	Berkeley Strategic Land Ltd
Address	Berkeley House 19 Portsmouth Road COBHAM KT11 1JG
Event Name	Pre-Submission Local Plan
Comment by	Berkeley Strategic Land Ltd ([REDACTED])
Comment ID	PSLP_1680
Response Date	04/06/21 11:48
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	PSLP_1678-1682 Berkeley Strategic Land Ltd. Representation Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Berkeley Strategic Land Ltd
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Question 4	

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please refer to paragraphs 4.1 – 4.12 of the attached representations.

[TWBC: for full representation with appendices, please see supporting documents]

4.0 Place Shaping Policies

4.1 As referred to above, Berkeley objects to the distribution of growth within the Borough, in which development should be focused on the most sustainable settlements within the Borough such as Tunbridge Wells and Cranbrook.

4.2 The Housing Supply and Trajectory Topic Paper (February 2021) which forms evidence as part of the consultation states that both Tudeley Village and Paddock Wood are anticipated to deliver first completions as early as 2025/26 with a total of 3,540 dwellings at Paddock Wood and East Capel and 2,100 dwellings at Tudeley Village being delivered within the Plan period up to 2038.

4.3 However, Berkeley anticipates that the Council's assumptions for delivery on both of these strategic sites at Policy STR/SS 1 and STR1/SS 3 are particularly ambitious given the likely lead in times for sites at this scale. The Lichfields report 'Start to finish' (February, 2020) highlights the major lead in times associated with large strategic sites, in which the average time from validation of the first planning application to the first dwellings being completed on schemes of 2,000+ dwellings takes 8.4 years. The report also states that the annual average build-out rate for schemes of 2,000+ dwellings is 160 dwellings per annum.

4.4 Based on Lichfields analysis that schemes for 2,000+ dwellings can take up to 8.4 years to deliver from the submission of a planning application, Berkeley has formulated a revised timetable for delivery at these strategic sites.

[TWBC: for table, please see supporting documents]

4.5 This will mean that the allocations at Tudeley Village and Paddock Wood will only be able to deliver up to 6 years' worth of housing supply within the Plan period. Based on the Council's projected completions for these allocations, this amounts to circa. 900 dwellings at Tudeley Village and 1,800 dwellings at Paddock Wood, totalling the delivery of just 2,700 dwellings within the Plan period and a shortfall of 2,940 dwellings.

4.6 In addition, if we apply Lichfield's assessment of average delivery rates, Paddock Wood and East Capel will only be able to deliver up 160 dwellings per annum, this means that this allocation will only be capable of delivering circa. 960 dwellings up to 2038.

4.7 In addition, if we assume that Tudeley Village will deliver at the delivery rate set out within the Council's housing trajectory from 2032/33 to 2034/35 at 150 dwellings per annum and apply Lichfield's assessment of average delivery rates from 2035/36 to 2038, this means that the allocation will deliver only 930 dwellings within the plan period.

4.8 Therefore, the total delivery of these strategic sites combined would amount to 1,890 dwellings within the Plan period and a shortfall of 3,750 dwellings.

4.9 Therefore, the Council's housing trajectory for delivery at these strategic sites seems significantly unrealistic given an anticipated annual delivery rate of 300 dwellings per annum at Paddock Wood and East Capel and 200 dwellings per annum at Tudeley Village.

4.10 As such, if projected first completions at Tudeley Village and Paddock Wood, including land at East Capel start from 2032/33, this will mean that the Council can anticipate a shortfall of between 2,490 dwellings – 3,750 dwellings within the Plan period.

4.11 As referenced at Policy STR/SS 1, there are a number of factors that will impact upon the delivery of both Paddock Wood and Tudeley Village. The policy notes that the possible CPO of land at Paddock Wood may be required, in addition to the creation of an SPD, the fact that both allocations will require significant input from multiple landownerships and rate of delivery will depend on market absorption rates.

4.12 Therefore, Berkeley objects to the level of growth planned for at Policy STR/SS 3 Tudeley Village and Policy STR/SS 1 at Paddock Wood, including land at east Capel which in Berkeley's view, justifies that the Plan is not sound as it is not justified nor is it effective as set out by paragraph 35 of the NPPF.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to paragraphs 4.1 – 4.12 of the attached representations.

[TWBC: for full representation with appendices, please see supporting documents]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to paragraphs 4.1 – 4.12 of the attached representations.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please refer to paragraphs 7.1 – 7.14 of the attached representations.

7.0 Sustainability Appraisal

7.1 The Council's SHELAA site assessment has been supported by an updated SA, included as part of the Regulation 19 consultation.

7.2 The Council's assessment of Tutty's Farm remains unchanged from the previous 2019 SA, however the Council has included additional constraints to development within the SHELAA.

7.3 Berkeley would like to refer the Council to the technical work undertaken in support of the SHELAA submission which has been provided to the Council. This work demonstrates that development will be located outside the area of ancient woodland and the Local Wildlife Site which will be sensitively located to limit potential harm to the AONB.

7.4 Berkeley has provided a re-appraisal of the Council's SA assessment which rescores the site in response to the technical work undertaken to date.

[TWBC: for tables, please see full representation attached as a supporting document]

Biodiversity

7.5 Berkeley commits to providing a net biodiversity gain on all new developments. The masterplan has been designed to be landscape-led through enhanced planting and management of significant landscape features within the site.

7.6 On this basis we consider that the site would have no negative impacts on biodiversity and therefore a positive scoring against this SA objective has been applied.

Heritage & Landscape

7.7 Within the SA, the Council's negative heritage and landscape score has been informed by the likely impact on the settlement edge and landscape setting of Tunbridge Wells.

7.8 The 2021 SHELAA assessment is contradictory, whereby the site is referred to as being "adjacent to the LBD of RTW" and has later been discounted as a suitable site for allocation due to being "outside of the LBD". However, the Council's 2019 SHELAA assessment of the site notes that Tutty's Farm would form a "logical extension to the existing allocation adjacent to the site" which adjoins the built up settlement edge of RTW.

7.9 Therefore, the proposed development would be consistent with the existing character and form of RTW and the neighbouring allocation at Hawkenbury Farm and would not cause a negative impact on the settlement edge of RTW.

7.10 As specified at paragraph 5.5 of this submission, the site is well enclosed by vegetation on its northern, eastern and southern boundaries, providing a strong defensible boundary within the landscape setting of Tunbridge Wells.

7.11 Therefore, to reflect the above, the heritage and landscape SA objective scores have been amended to neutral.

Land Use

7.12 Tutty's Farm has an agricultural land classification of Grade 3 which has informed the Council's negative score for land use.

7.13 However, the positive social impacts of the proposed development in the form of a new purpose-built community building, affordable housing for local people and provision of a variety of natural green spaces would constitute a lower negative scoring of the site against this SA Objective.

7.14 Therefore, the land use SA scoring has been adjusted to a single negative to reflect this.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1678-1682 Berkeley Strategic Land Ltd. Representation Redacted.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Adrienne Bishop [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Adrienne Bishop [REDACTED]
Comment ID	PSLP_38
Response Date	15/04/21 14:57
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mrs Adrienne Bishop
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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We have lived in this area of 38 years, both in Five Oak Green (where we are now) and also in Paddock Wood. Our children attended Paddock Wood primary school before moving on to secondary education in Tonbridge and Tunbridge Wells. We are saddened by the sheer volume of empty shops in Tunbridge Wells and also the vacant cinema site in the town.

Paddock Wood currently has three very large housing developments under construction giving a potential increase in occupants of 4000+ individuals

The infrastructure is already under strain in Paddock Wood due to lack of capacity for sewage as an illustration of this.

It is believed that as it is already difficult to get an appointment with the local Health Centre, all increases in the population will make this harder.

To say that there will be schools and health centres built is surely dependent on whether central government and national agencies can afford to pay for staff and equipment

To assume that the land of East Capel is "part of Paddock Wood" is disingenuous. It is part of Capel Parish, part of the Green Belt and serves as a buffer between the two settlements, which is what the green belt is designed to do.

The land at East Capel is on a floodplain and has a tendency to flood. No drainage systems developed to serve new houses will cope with floodwater and will merely exacerbate the problem not only within East Capel but also to the wider area. It will never be possible to prevent the River Medway and surrounding streams from breaking banks during heavy rain

On a normal day, traffic heading into Tonbridge can be backed up along the B2017 almost to Five Oak Green. Clearly this will get worse if yet more building is allowed.

Network Rail has already stated that it is at capacity now. Where will commuters go? Presumably they will use their cars.

All future developments must surely have to take into account the effect of the pandemic, whether more people will work from home, whether the high streets will cease in their current forms. Paddock Wood's Commercial Road is already a mix of private housing and retail outlets. If more shops shut, the vacant properties can easily be turned into private housing which will not be out of keeping with the road as it is now.

Question 6

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It is understood that a consortium has suggested land at Castle Hill as an alternative to the proposed developments within the parish of Capel. This land, whilst being part of the AONB, is situated by the A21 "corridor" thus giving quick access to both London and the coast without impinging on the local community.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
---	---

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
--	--

Comment

Consultee	Rev Roger Bishop [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rev Roger Bishop [REDACTED]
Comment ID	PSLP_42
Response Date	17/04/21 13:12
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Rev Roger Bishop
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Capel for 31 of the last 38 years: for 3 years in the centre of Five Oak Green, and for the past 28 years on the eastern extremity of the village.

i have witnessed a huge increase in traffic volumes in the area over that period, with no offsetting changes to the road system. The impact of traffic congestion is bad, and potentially life-threatening already as the A228, which runs north to south through Capel, links our 2 major hospitals and the local ambulance depot is in Paddock Wood, meaning that ambulances often have to travel along Capel's congested roads. All of this is before the current huge developments in Paddock Wood come "on stream".

For much of the day trying to cross roads locally is dangerous and entails a lengthy wait.

The government is seeking to encourage cycling, but only the hardy and brave continue to cycle on our local roads as they are too busy and life-threatening. It is not unrealistic to expect the numbers of cyclists to plummet if the massive increase in house numbers planned, on top of the huge developments going ahead in and around Paddock Wood goes ahead.

While there is a good network of rural footpaths which we and many others walk regularly – some of which will be destroyed by the planned development - few roads in the parish have pavements beside them. This means that people have to take their lives in their hands to walk between, for example, East Capel and their local town, Paddock Wood. It will become a significantly greater hazard with the Paddock Wood developments under way now, and even more so if this plan goes ahead.

Rail services from our nearest station, Paddock Wood, are already very crowded. Something I witnessed as a regular commuter even 15 years ago. Network Rail have admitted that the line into London is already at capacity.

There has been no significant change to local services for many years. For example, the local medical practice is already under pressure, with difficulty getting appointments. There is no indication that vague promises of additional services have been agreed with those who have to fund and staff them.

In all of my time in Capel, flooding has been a threat in several parts of the parish. Of special relevance to this plan is that in recent winters the B2015 in East Capel has had to be closed because of flooding and local fields have been under water.

The proposed development in East Capel will seriously exacerbate all of these issues.

In addition:• it will destroy green belt• it will destroy productive farm land• it will destroy the habitat of a range of wild life. For example, the wonderful buzzards we see regularly in and above East Capel's

fields will disappear, as will deer, badgers and foxes, to name only a few. • it will merge Capel with Paddock Wood, ruining what has, until now, been a small and pleasant village community with a well-documented history • it will not guarantee much-needed affordable housing. Experience shows that developers' promises often mean little. • the impact will spread widely beyond Capel, ruining a number of established rural communities.

There appears to have been little or no effort by Tunbridge Wells Borough Council to: • engage seriously with the significant public response against the plan under Regulation 18 • consider whether the housing needs figure they have used is soundly based, and uses the most up to date statistics • identify and assess the many brownfield sites within the borough, including in Tunbridge Wells itself • identify and assess the feasibility of building additional floors above existing buildings, especially in town centres, for domestic use • look carefully at more suitable sites in other parishes within the borough • judge whether it is wise, or equitable, to place such a very high proportion of this current set of developments that they believe are necessary in just one of the 14 parishes and 2 towns in the borough • comment on whether local residents housing and other needs might better be served by seeking to regenerate the centre of Tunbridge Wells, which is in a poor state with regard to empty commercial premises and other vacant sites – such as the former cinema site opposite the Town Hall, which has been an eyesore for many years

Question 6

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I cannot identify any modifications that would overcome the negative impact of this proposal.

But the proposed alternative development at Castle Hill overcomes a number of the objections listed above. For example, flooding, transport links (where it is adjacent to the recently upgraded A21), and destroying farm land and an established community (the land is already blighted by the A21 and the North Farm development)

A proper assessment of brownfield sites and building upwards could solve a good proportion of the perceived housing needs. Who knows what percentage if it is not seriously and impartially looked into?

Question 7

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No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Valerie Bourne [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Valerie Bourne [REDACTED]
Comment ID	PSLP_1716
Response Date	04/06/21 08:37
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Valerie Bourne
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I am writing to object in the strongest possible terms to the Local Plan for development of the Paddock Wood and Five Oak Green area. The number of houses, the use of land which regularly floods, the removal of trees and hedges (which exacerbates flooding and removes habitat for wildlife), the air and noise pollution caused by many years of construction and the lack of planned improvements to services in the area are just some of the reasons that make this plan unacceptable. There seems to be little or no provision of new medical, educational, sporting or policing services. The police station has been sold for redevelopment so, if anything, police presence will even more reduced.

I chose to live in Paddock Wood because it is a small town with easy access to open countryside and woodland walks. The well-being of residents will be severely affected when this is no longer the case. The idea of closing the railway bridge to traffic is utterly ridiculous, dividing the town in half. People do walk into the town when they can but there will always be times when they need to use their cars. Many have mobility problems and no-one can carry a week's shopping. It can't possibly help the environment if people have to drive several miles around the outside of the town to shop, get medical attention or get to work, sitting in queues of traffic which would be the inevitable result of this.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Peter Bowden ()
Address	<div></div> <div>Tonbridge</div> <div>TN10 </div>
Event Name	Pre-Submission Local Plan
Comment by	Peter Bowden ()
Comment ID	PSLP_2142
Response Date	04/06/21 09:05
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.12
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Peter Bowden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Higham Lane, Tonbridge for 27 years and am now retired. My wife and I have, over the years, enjoyed many walks in the beautiful countryside around Paddock Wood.

I strongly object to the proposed development plan for Paddock Wood on the following grounds:

1. Desecration of Green Belt land with loss of amenity

Under section 136 of the NPPF 2012 it is made clear that any proposed development on Green Belt land should only be justified where *exceptional circumstances* can be demonstrated. There are no exceptional circumstances in this case. Indeed, there are far better sites for development closer to Tunbridge Wells in the Longfield Road/North Farm/Knight's Park areas, which abound the double carriageway A21 road and whose development would entail far less loss of amenity as the land in question is already blighted by the heavy traffic on the A21.

2. Adverse effects on Tonbridge

TWBC has clearly decided to move a very large part of its future development onto the boundary with Tonbridge, with consequential negative effects on Tonbridge. Unless schools, shops, doctors' surgeries, dentists' surgeries and supermarkets are built in Tunbridge Wells as part of the development, residents of the new site will clearly travel into Tonbridge to use Tonbridge's facilities rather than try to get into Tunbridge Wells. This would also include the use of Tonbridge main line railway station for commuters unless a new station were to be part of the development. No one living in the development would dream of using the inferior Tunbridge Wells to London line.

All of Tonbridge's GPs and dentists are completely oversubscribed and its roads are already snarled up in the several daily rush hour periods. Any extra load coming from this development would push Tonbridge roads and services to breaking point.

3. Flood Risk

Building so many houses on this site, which is a very flat flood plain with clay substrate adjacent to the River Medway cannot be justified. There have been many well documented cases of flooding in this area over many years, and this development will only exacerbate the risk of future disastrous flooding. It is unbelievable, after so many national disastrous flooding events brought on in part by climate change, the TWBC could contemplate building in such an area.

Question 7

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No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lady Elizabeth Akenhead [REDACTED]
Email Address	[REDACTED]
Company / Organisation	British Horse Society
Address	[REDACTED] [REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	British Horse Society [REDACTED] [REDACTED]
Comment ID	PSLP_1528
Response Date	04/06/21 12:13
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	British Horse Society
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Paragraph Numbers: 5.179 - 5.193

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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Please see our general comment on the Plan.

Policy STR/SS1 fails to make any provision for new public bridleways or off-road horse riding routes, to compensate for the additional vehicular traffic from the new developments which will make the roads around Paddock Wood, on which horses are currently ridden in between the few and scattered bridleways, unsafe for horse riders. Without such provision, horse riding will effectively be killed off around Paddock Wood and people who want to ride will have to travel miles with motor vehicles to access riding routes.

In the policy

2d and 2j should provide for new horse riding routes;

9 should include horse riding linkages

15g should include new horse riding facilities.

Para 5.181 should include horse riding links

Para 5.182 should include new horse riding facilities (preferably a new riding centre linked to riding routes in the new Wetlands Park).

It is worth noting that wildlife is much less disturbed by horse riders than by pedestrians or cyclists, because the presence of the horse (a herbivore) masks that of the rider. Opening the Wetlands Park to horse riders would not only improve recreational facilities for the many people, predominantly women and children, who want to ride, but would enable an excellent means of birdwatching.

Question 6

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Para 5.181 3rd sentence, after “walking” insert “horse riding”

Para 5.182 2nd sentence, after “centre” insert “and a new riding centre”. 3rd sentence, after “habitats” add “and providing new walking and horse riding routes”.

Question 7

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Yes, I wish to participate in hearing session(s)

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Miss Tegan Bryant ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Miss Tegan Bryant ([REDACTED])
Comment ID	PSLP_2058
Response Date	04/06/21 16:05
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Tegan Bryant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The Local Plan is unsound due to the fact that it is not consistent with national policy. Paragraph no. 5.183 talks about the release of Green Belt land in Paddock Wood. This is not consistent with the 2018 '25 Year Environment Plan' which states 'About 12% of land in the United Kingdom is designated as Green Belt land, and we remain committed to protecting it. The Green Belt plays an important role in preventing urban sprawl through the planning process'.

If the Local Plan goes ahead my house and my neighbours' Grade II listed houses will be surrounded by the new developments, essentially ruining the outlook over historic farmland.

Question 6

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Do not release the Green Belt land.

Do not build as many houses, especially ones that will not be affordable to first time buyers.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Emily Cammell [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Emily Cammell [REDACTED]
Comment ID	PSLP_1156
Response Date	04/06/21 01:05
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Emily Cammell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 - The Strategy for Paddock Wood, Including Land at East Capel

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Paddock Wood for around 28 years now and have grown up here. Over the last 3 years, I have seen the town go through significant changes due to major new developments and I fear the character of Paddock Wood is changing from a small country town into an urban sprawl.

I strongly object to Policy STR/SS 1 - The Strategy for Paddock Wood, Including Land at East Capel for reasons as I will detail below.

Flood Risk - During periods of heavy rain, there are often flooding issues in Paddock Wood. Badsell Road (B2017) is prone to flooding and these incidents have become more frequent since the Foal Hurst Green development began. I have also walked around Church Farm after periods of heavy rain to find myself ankle deep in water and the ground extremely boggy. Again, this was before development of Church Farm had begun. If there have been problems with flooding before these developments started, I fear that any further housing developments (building over fields and tearing up trees and hedgerows) will pose an increased flood risk, not just to Paddock Wood but also the surrounding towns and villages such as East Peckham, Yalding, Golden Green and Tonbridge. The proposed development at East Capel is on a flood plain and we cannot assume that flood mitigation measures will be enough to minimise flood risk and they could potentially fail, especially when you consider unpredictable climate change. Surely building on a flood plain is both ridiculous and unsustainable?

Wildlife and Environment - These plans seek to build on Green Belt land, which does not make sense for sustainability or reducing environmental impact. I have noticed more wildlife presence in the town and housing estates since the three new housing developments began. I think this is due to destruction of habitat/sources of food and I really feel for the wildlife, as with the town further expanding, they will have nowhere to go. I have recently been on walks through Foal Hurst Wood and the amount of noise and disturbance coming from the neighbouring Foal Hurst Green development is very noticeable and a nuisance. More new developments will surely have a further negative impact on our local wildlife. There have been frequent national news headlines over the last year that Britain is losing much of its biodiversity and that it is even at risk of collapse. I fear this will worsen if further major development is allowed to go ahead, especially if they are within our Green Belt areas and AONB. Many people have found nature and the outdoors a great source of wellbeing, especially during the covid pandemic and I think it is vitally important that these areas are protected from development, for the benefit and wellbeing of both local wildlife and residents.

Traffic and Congestion – I used to commute to Tunbridge Wells each day by car for work. Since the new developments began, I certainly noticed a difference in the traffic and especially at peak times (7:30am – 9am and 5pm – 6:30pm) there was increased congestion, especially with school traffic and fellow commuters. I think it would be naive to assume that improved cycle and walking routes would mean a reduction in the amount of traffic. It may help, but I think many residents would still choose to drive private vehicles, especially if they are a further walking distance from the train station (where

they would have to drive and park) or if they work in neighbouring towns or even further afield. The train stations at Paddock Wood and Tonbridge were also packed at peak times (pre-covid), as I had experienced many a time. An influx in housing and a large increase in population, without improved infrastructure, will put more pressure on these amenities and contribute further to traffic congestion and air pollution.

I also want to object to the idea of closing the railway bridge on the Maidstone Road. This would effectively cut Paddock Wood in half and put increased traffic pressure onto Badsell Road (B2017) and smaller country lanes such as Queen Street. I regularly visit family and friends in East Peckham and it would increase my journey distance and fuel use, which is not economical or environmentally friendly.

Facilities - Paddock Wood has seen little or no improvement to infrastructure or facilities over the years. We have been made promises of 'infrastructure before development' which have not been kept. Our sports centre is small with no swimming pool. The health centre is oversubscribed and it is sometimes difficult to get an appointment when needed. There is also a lack of facilities and activities for young people here. How is the town supposed to cope with an increased population when these facilities are not yet provided?

'Affordable' Housing – I do not think that any housing in these new developments can be deemed as 'affordable' if prices on the new Foal Hurst Green development are anything to go by. A one bedroom apartment at Foal Hurst Green starts from £255,000. As a single first time buyer saving up for my first home, I do not think that this price can be deemed as 'affordable' and if many buyers (especially first time buyers) cannot afford these new homes – how can these proposed developments be considered as a response to solving the supposed housing shortage? I also wonder why these sites have been allocated a disproportionate amount of housing compared to the rest of the borough, as this seems unreasonable.

I also feel that Tunbridge Wells Borough Council have not done enough to engage with the community about these plans and take into consideration and address residents concerns.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Heather Campbell ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Heather Campbell ([REDACTED])
Comment ID	PSLP_1314
Response Date	04/06/21 15:41
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Heather Campbell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1 For Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We are residents of Paddock Wood, backing onto the proposed East Capel site. We brought our property 2 years ago to start our family. We loved the small town friendly feel of Paddock Wood and the beautiful surrounding countryside. Which will all be lost with the proposed plan.

Creating a 4000+ new houses in paddock wood, almost 40% of all the new housing in the whole of Tunbridge Wells (1,500 new houses in East Capel) and a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to residents of the Parish of Capel and Paddock Wood as well as to residents of Tonbridge. So 65% of the new houses will be in the Capel and Paddock Wood parishes. There are other more suitable sites such as the A21 corridor

Here we outline some of our main concerns:

Flooding

The plan is to build on flood plan. This will require extensive flood defences – which will divert funding from other areas and increase the flood risk to Paddock Wood and the surrounding area.

Last year many houses on our road, Ribston Gardens, flooded leading to destruction of property and upset, and we can expect this to be common place if the land behind our house is built on.

Any mitigation for Tudeley and Capel will just move the flooding problem further down the River Medway to places such as Yalding which has suffered from significant flooding over many years.

Biodiversity

Pipistrelle bats (various species) are nesting in the local area, including our neighbour's trees, which will back onto the new development. These bat species have a conservation order protecting them, so any planned development needs to abide by the standards set out by British law. We also have a huge range of animal and bird species, listed below, which visit our garden regularly: Hedgehogs (Listed on Britain's most endangered animals, population has declined by a third since the millennium) Badgers Foxes Rabbits Robins Blackbirds Wood pigeons Blue tits (nesting in the woods by Tudeley brook behind house) Goldfinches Thrushes Magpies

Sparrow Hawk – in field behind

Heron – Tudeley brook

Butterflies – cabbage white, red admiral and Kentish blue

Dragonflies

Frogs.

The current plan does not appear to be taking the wildlife into account. The table listed on the plan for this area simply said 'limited biodiversity constraints', which we feel is not taking into account the range of animals present in the area, particularly the endangered ones, which will be severely affected.

Green belt

1000's of acres of Green belt land will be lost. Why are the brown belt sites not being considered first?

The current plan will destroy existing old woodland, which is vitally important for countering global warming. The companies building may well plan to plant new trees to offset new carbon emissions, however trees take many years to mature and so this will not benefit the environment for many years to come. Global warming is a huge problem which we have to tackle now before it's too late and this will exasperate it.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

This land is Green Belt land and should only be built upon if an "exceptional circumstance" exists. Most of our objections outlined above apply to the Tudeley settlement as well.

Wellbeing

We have lived in many places (Cambridge, Portsmouth and Gravesend) but chose to buy our first house in Paddock Wood as we wanted to live in a beautiful green belt area. With all the health and wellbeing advantages of being in the countryside. This last year with the Covid-19 pandemic has shown how important wellbeing is. We wanted to bring up our children in a quiet area and less polluted environment.

Pollution

Air quality will decrease – this is very worrying to us as I suffer from asthma. One of the reasons we chose to buy a house in Paddock Wood this year was the lovely fresh air to help me, which will be lost with this new construction. Additionally light and noise pollution will increase.

Sewage and water

Sewage systems already can't cope, already approved developments now being delayed because of this and additional work having to be done to make them viable, for example the development along Badsell Road.

Housing need

Currently, the area of Paddock Wood has seen a massive slowdown in the property market. People are preferring to look at places such as Tunbridge Wells, Sevenoaks and for convenience to London places such as Ebbsfleet Garden Village. When we were buying our house there were many properties which had been on the market for a very long time and having to make multiple price reductions to try to sell as this is not a popular area at present. The rate of sales has slowed down so much that local estate agents have started closing down. We struggle to see who will be buying these thousands of new homes when the houses already in Paddock Wood aren't selling.

Health services

Paddock Wood already requires a new Health centre for the current population, Woodlands Health Centre is already stretched to capacity, and wait times for doctors' appointments are excessive. Plus there is a lack of dental and social care which is not addressed in the local plan. Even with the proposal for a medical centre in the plan we are still concerned about the increased demand. It is difficult to judge the capacity of the proposed Health Centres as no size is given in the Plan.

Schools

The Plan proposes additional schools to be built in both sites. But it is not clear if this will be done before all the houses are built leading to oversubscribed schools.

Roads and Transport

We both commute to work and the trains are already crowded, the new development will make trying to catch peak time trains impossible. Other public transport will need to be increased tenfold to cope with the additional people wanting to get to Tonbridge and Tunbridge Wells, currently bus services are inadequate at best. Road congestion will become normal in Paddock Wood with the 4000+ proposed houses. The road from Paddock Wood to Tonbridge B2017 is already seriously congested during the

school run period. This plan will result in even more congestion as people try to get to the new schools or A21. There does not appear to be a solution in the plan.

The plan states that cycling and walking to the station will be encouraged by the building of new cycle and pedestrian routes. The route from Tudeley to Tonbridge is shown as following the B2017 which is not wide enough to allow a separate cycle or pedestrian path. The proposed cycle route from Five Oak Green to Paddock Wood requires either crossing the busy A228 adjacent to the railway bridge limiting oncoming driver's vision or crossing at the centre of a right hand bend which has already been the site of several accidents.

TWBC has recently proposed making the B2160 Maidstone Road over the railway in Paddock Wood a one way system which would require a diversion of several miles if you wanted to go to a location the wrong direction to the one way route over the bridge. This proposal would only be feasible if all the new roads indicated in the submission were completed. A major assumption on behalf of TWBC. This much longer route will again increase congestion and air pollution.

Emergency services

Currently, Paddock Wood only has a part time fire service and doubling the number of properties will require a full time permanently operational fire station which there appear no plans for. Also, the local hospital in Pembury will have to expand to cope with the mass increase in the local population.

Utilities

Will the existing electrical substations be able to cope with the increased demand? Would additional pylons be required or will the main power supplies be sunk in the ground resulting in either additional eye sore and environmental impact.

We have heard there is a lack of a gas pipe across the Capel Parish and worry about the implications of this for the new development.

Overall, we are deeply trouble about the new plans which will destroy the beautiful green belt land, kill the wildlife and will also apply pressure onto the neighbouring borrow of Tonbridge and Malling owing to Paddock Wood location next to Tonbridge.

Yours sincerely

Heather Campbell and Alexander Christofis

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
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Supporting Information File Ref No: SI_46

Comment

Consultee	Hugh Patterson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Capel Parish Council
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Capel Parish Council [REDACTED]
Comment ID	PSLP_772
Response Date	02/06/21 10:07
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	VfC Document v11.2.pdf
Question 1	
Respondent's Name and/or Organisation	Capel Parish Council / Hugh Patterson Chair CPC and Capel Ward Councillor
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not positively prepared
. It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Comments on STR/SS1 by Capel Parish Council.

These comments have been drafted by the Chairman of the Council (who since 6th May 2021 has also been the Borough Councillor for Capel Ward) in consultation with other members of the CPC and contributed to by members of the Capel Neighbourhood Plan Working Group.

The policy is not legally complaint because you are in breach of your Statement of Community Involvement para 1.7 "The objective is to ensure that everyone with an interest in planning understands how they can contribute to, and influence, the planning decision-making process"; this has clearly not been possible as you have insisted in rushing this through during a pandemic. 1.10 fails to comply with the Equality Act 2010 as you have not ensured that involvement will be open to all, regardless of **age, disability**, gender, pregnancy and maternity, race, religion and belief, **rurality**, and sexual orientation and 1.12 it does not produce "better outcomes that meet local aspirations and requirements". We would submit the local aspirations and requirements of the residents of Capel Parish have been completely ignored, despite you having been repeatedly been made aware of them by Capel Parish Council and others.

Capel Parish Council believes the PSLP proposal for SS/STR1 fail the test of soundness:

1 It is not positively prepared:

Policies STR/SS1 and 3 will have a huge impact on our residents and are NOT locally led. Any future planning decisions in Capel Parish will be dwarfed by the impact of the plan. At no point has this council expressed a view supportive of this strategy.

The planning process lacks community engagement and support. TWBC has only made limited attempts to engage with local residents or win their support. There was an exhibition at Regulation 18 in the summer of 2019 but nothing since. In the 'Vision for Capel' consultation carried out by Capel Parish Council's Neighbourhood Plan Working Party in August 2020, to which 25% of all households replied (the consultation was not online – but required residents to post their responses through a nominated post box) found 96% opposition to the plans at East Capel. You have carried out no such attempt to gauge the views of residents. The local election results in May 2021 showed the highest turnout,

biggest swing and largest majority for the candidate clearly campaigning against these proposals. The lack of community engagement is clearly demonstrated.

CPC deplore that this consultation has been carried out during a pandemic when it easily could have been delayed. Not only did it start before the election period for our Parish and Borough elections (something you seemed to have overlooked in your haste) but proceeded despite the pleas of the parish council to delay until after the local election and pandemic lockdown. The online nature of the consultations (necessitated by the insistence in carrying them out during lockdown) excluded those of our residents with no or limited access to the Internet. Your provision of access to a hard copy available in the Gateway in Tunbridge Wells (over 6 miles away with no direct public transport service) was inadequate. It was only on May 11th six weeks into the consultation that a copy was provided to the Parish Manager and Clerk; and even then, she had to collect it herself from Tunbridge Wells.

There is only very limited information in the PSLP and SA on why alternative strategic sites to Capel were rejected (far less information than on small scale sites rejected) e.g., there is no comparison between the site in Horsmonden and its 'severe access difficulties' [not explained] and the sites chosen; it is not measured against the comparative negative criteria in Tudeley and East Capel despite both being in the Green Belt. The Borough Council's Planning Policy Working Group (where presumably these plans were drawn up) has no published minutes or clear terms of reference. The formulation of these plans therefore lacks transparency. When contacted the Office of the Information Commissioner told the Vice Chairman of CPC, "Your complaint has been accepted as eligible for further consideration and a case worker allocated" accepting there are grounds for complaint against TWBC on your lack of transparency in developing these plans.

Your officers only made attempts to work with Capel Parish Council (at the time there was no neighbourhood planning group) after the strategic sites in Capel Parish had already been determined. The views of Capel Parish Council were only sought after this strategy had been adopted in spring 2018. The council's view is that there is no need to build housing in the Green Belt and the Borough Council's strategy is flawed. CPC were invited to send one representative to the SSWG (again a body with no published minutes and not open to public scrutiny) along more latterly with one from the Neighbourhood Plan working party. But they were clearly outnumbered by developers and representatives from Paddock Wood and at no point have any of their views influenced the PSLP. Similarly, representatives were invited to one Zoom session by DLA on 28 September 2020. At no point did DLA make any other attempt to understand the aspirations of Capel residents. The Zoom session involved deciding where to build on East Capel and not if. CPC were concerned that not only were Paddock Wood representatives asked to plan what was to be built in East Capel, but that you had also carried out a consultation with Paddock Wood Town Council/NP Group on the siting of the sports hub in East Capel without informing or consulting Capel Parish Council. The Parish Council were subsequently informed of the Masterplan for East Capel and the associated infrastructure by TWBC planning department and DLA in a Zoom meeting. This does not amount to consultation. At no time beforehand was Capel Parish Council consulted about the site of the sports hub nor the detail of the offline A228 improvement nor the 'Five Oak Green bypass'. Neither has CPC been consulted about the closure of Paddock Wood railway bridge to all but bus traffic. Although this is not in our parish the knock on effect would be to send all the traffic **through our parish** on the B2017 and the A228.

On p.140 the PSLP says "the expansion **was** facilitated through the release of land from the Green Belt: the exceptional circumstances to justify this are set out in the Development Strategy Topic Paper". We note the past tense. At no point has Capel Parish Council been informed that part of its parish has been removed from the Green Belt.

In the 'Strategic Sites Master planning and Infrastructure Study' DLA assert para 1.8 that remote working did not affect the study - without presenting any evidence to support this. The lack of consultation with Capel residents might cause this to be doubted. For example. "Garden City [sic] principles are supposed to be locally led" para 2.3 – this has clearly not been the case in Capel. DLA have focused most of their work on the town of Paddock Wood and frequently describe the whole area as the 'town'. In para 2.9 p.13 they describe "Capel Parish is a rural parish comprised of small villages,

where the community comes together in shared facilities such as schools.” Apart from the fact there is only one school - Capel Primary School - in the parish (discounting the Independent Schools at Somerhill on the edge of the parish, which draws students mainly from Tonbridge), this is a really inaccurate and superficial statement written by someone who has clearly never visited the Parish. There are four pubs and restaurants open at the time of writing, a cricket club with a large membership, football, and other sporting clubs as well as a range of voluntary organisations. Furthermore 75% of the population live in Five Oak Green, a larger village, something that seemed to have escaped DLA’s less than exhaustive research, and which they referred to as ‘Five Oaks’ throughout the Zoom call. On page 35 they assert that Whetsted Road is a possible ‘quiet lane’ route for bicycles. Anyone with a passing knowledge of the parish would know that the road is a rat run used by through traffic to access the A228 and residents have persistently complained about traffic issues on the road. P.53 also refers to the Medieval moated Badsell Manor (the oldest secular building in the parish) as ‘Badsell Farm’. The proposed planning of East Capel p.81 in a way ‘akin to the villages and hamlets’ of the parish seems uninformed and patronising to local residents, especially when building this way is really an effort to mitigate the worst of the flood risk. A better solution would be to build outside the Green Belt and not in Flood Zone 2 where the housing is being planned. DLA have master planned development in a parish which they clearly do not understand and have seemingly never visited. Their assertion that Covid did not affect their study is clearly not true in this regard. Capel Parish Council reject the assertion at para 4.3 p.10 of the Strategic Sites Topic Paper that ‘a detailed understanding of the land which forms part of the growth around Paddock Wood and East Capel has been obtained’. DLA have done nothing of the sort for East Capel as the examples above illustrate.

Capel Parish Council also deplore that the SPD for this site is not available and we have not had sight of it at this important stage, especially since TWBC stated that consultations with stakeholders would commence in early 2021. This is another sign that this plan is being rushed through without sufficient and **transparent** consideration.

1 **It is not justified.**

1 **No exceptional circumstances have been put forward for building on the Green Belt outside Paddock Wood in Capel Parish when there are alternatives which would leave the MGB intact. The Parish Council’s view is that there is no need to build housing in the Green Belt and the Borough Council’s strategy is flawed.**

One of the differences between Paddock Wood and Capel is that the section of SS/STR 1 in Capel is part of the Metropolitan Green Belt and Paddock Wood is not. The other options around Paddock Wood examined before Regulation 18 would have produced fewer houses but would not have impinged on the MGB. The PSLP now seeks to put even more houses on the MGB section of this site than at the draft plan stage despite the huge majority of comments being against this aspect of the Plan. There are no exceptional circumstances because the council could have pursued an alternative development strategy combining other sites around Paddock Wood and brownfield sites across the Borough to produce the required housing numbers. The expansion of Paddock Wood can be achieved without using Green Belt land at East Capel for housing. 4,000 new dwellings in Paddock Wood are in any case excessive given the scale of recent developments, and overambitious and Green Belt land in a neighbouring parish should not be taken to provide for this. Capel Parish Council believe that if TWBC is not willing to argue that the housing need given to them by government is too high, you can use the NPPF’s protection of Green Belt to adjust your expansion plans. CPC believe Paddock Wood can be regenerated without using greenbelt land at East Capel for housing and that either another location without constraints should have been chosen for a garden settlement, or one of the other Growth Strategy options should have been adopted.

1 **The section of STR/SS1 in Capel Parish makes a strategic contribution to the MGB preventing the coalescence of Five Oak Green and Paddock Wood. Its removal from the MGB is not justified in light of other non-Green Belt options around Paddock Wood that have not been pursued and would cause less damage.**

Policy EN18 of the PSLP p.374 says that “Development proposals should have regard to the setting of all types of settlement with particular regard to the **underlying historic pattern of settlement** and should seek to **avoid coalescence between settlements**”. The removal of this section from the MGB goes completely against this policy.

In your Green Belt Study Stage 2 in 2017, both sites were included in Broad Areas BA3 and BA4, making up the area between Tonbridge in the West and Paddock Wood in the East, and between the road through Five Oak Green in the South and the River Medway in the North. Both BA3 and BA4 were judged to cause **VERY HIGH** harm to the Green Belt if released.

The NPPF is clear that protection of the Green Belt is a high priority and can provide a strong reason for not meeting the OAN. The summary of your own Green Belt study (Stage 3) says: ‘The findings of the assessment of harm are summarised in Table 4.1 in Chapter 4 and depending on location, range from low harm associated with the release of land around Speldhurst and Pembury, to **very high** harm at Tudeley Village and Paddock Wood.’ However, in the main body of the report, the harm done by the release has been further downgraded to **high**. This is due to the very dubious argument that the contribution the site makes to Purpose 2 (preventing neighbouring towns from merging) is relatively weak which is clearly not true. On the contrary CPC would argue this is the most important part of the MGB in Capel parish as it prevents the convergence of Paddock Wood and Five Oak Green. In other words, it maintains a sense of openness and separateness between the two communities which is the whole point of the MGB – it does not therefore ‘weakly’ contribute to the MGB. The road between Five Oak Green and the Badsell roundabout on the A228 does not give this impression to the same degree, as there is not a clear sense of separateness between the village and its surroundings at this point. But once across the A228 it is very different – after a few houses near the roundabout there is open countryside right up to the LBD of Paddock Wood. The boundary between the two parishes is at its clearest here – yet the proposal of TWBC to end the MGB at the A228 would destroy this clear distinction between rural and urban which is one of the main functions of the MGB. **This most strategic section of the MGB preventing the coalescence of the two settlements would be removed by this proposal. The NPPF clearly states in paras 133 to 147 that green belt should only be released in exceptional circumstances. This land is key to preventing convergence between Five Oak Green and Paddock Wood and CPC do not believe these exceptional circumstances are supported.**

- 1 The proposals do not recognise the historic nature of Capel Parish as a settlement distinct from Paddock Wood nor do they give any consideration to the impact of the development of the proposals on the setting of the medieval moated Badsell Manor, nor recognise its impact on the biodiversity of this part of the Borough.**

The countryside between Paddock Wood and Capel is highly valued for footpaths, ancient woodland, wildlife, and its function separating the existing settlements. The proposals alongside those for SS/STR 3 cannot possibly lead to a net gain in biodiversity, contrary to the aims of the PSLP, and the associated road building conflicts with TWBC’s stated aim (Council motion: 17/7/2019) to be a carbon neutral council by 2030, and with the third bullet point of your recently published Climate Emergency Declaration.

- 1 The site lies at the lowest point in the parish of Capel; large parts of it lie in flood zones 2 and 3 and it is vulnerable to flooding from Tudeley Brook. Historically, this explains why the Medieval Badsell Manor is moated. CPC does not believe planning for house building in the flood plain is justified.**

While the PSLP maintains this risk will be mitigated by the developers CPC believe it is ill advised to develop on the flood plain in a period of climate change. The site flooded as recently as February 2020 when houses in Five Oak Green and Capel hamlet were inundated. The Tudeley Brook also feeds the Medway through the SS/STR1 site. Even though there are proposals for flood mitigation (though in the absence of the SPD it is difficult to know how effective they will be) the land in its current form is able to act as a sponge for much of the water. With more built form the water is likely to find its way to the Medway more quickly which will cause more frequent flooding and a bigger threat to the communities downstream, for example at Yalding, than at present. This is not a moment to increase the number of dwellings in a flood risk area.

Despite this site’s removal from the Green Belt, you have argued that betterment more widely in the Green Belt can be achieved by flood relief measures in Paddock Wood and elsewhere. Most houses affected by flooding in Capel Parish are in Five Oak Green which is not in the Green Belt. (For your information, there is a Five Oak Green Alleviation Scheme meant to protect c.100 houses in Five Oak

Green from fluvial flooding was originally drawn by the EA a decade ago). CPC maintain that introducing hard surfaces and dwellings on to the meadows and fields of East Capel and Tudeley will increase the flood risk beyond any mitigation measure, and although investment in flood relief measures elsewhere in Capel Parish would be welcome, it should not come at the price of further development on the flood plain in this parish.

1 The plans do not contribute positively to TWBC's climate change targets nor its aspiration to be a carbon neutral council by 2030.

The impact on carbon sequestration provided by the farmland, meadows, mature trees, and hedgerows on this site cannot be offset by a nod to zero/low carbon energy production. The impact of this development on climate change is clearly negative as demonstrated in the sustainability appraisal. Moreover, as you are no doubt well aware Local Plans should include policies to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004. It is clear that this plan does not make sufficient effort to encourage mitigation of and adaptation to climate change. The Policy STR7 titled 'Climate Change' lacks urgency and bears no relationship to the Government's 'nearly zero' targets. It is important that TWBC's strategic commitment is clear and achievable. It is essential that large scale development in the Borough can aim to be a zero-carbon development. If this cannot be achieved on a new development site, then the TWBC target to achieve net zero emissions across the Borough by 2030 is all but certain to fail. The failings of the largest strategic sites (which are fundamental to the overarching strategy of the Local Plan) to contribute adequately to the Government's 'nearly zero' 2030 targets, means that this Local Plan does not secure development and use of land which will contribute to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004.

1 This site combined with the proposals for STR/SS3 would mean one parish (with around 2% of the Borough's population) being expected to accommodate 63% of TWBC's housing need.

This is hugely disproportionate and will completely change the nature of this parish. The environmental impact of the development in the Green Belt in one small parish, when set alongside the impact of the associated transport infrastructure for these schemes which will carve its way through the remainder of the parish, will disproportionately damage the quality of life for Capel residents over the coming years. Essentially the council needs to rethink its strategy and avoid building on the Green Belt, to protect the quality of life for its residents in Capel who cannot be expected to bear the full burden of development for the whole borough. This SA is based on the needs of the Borough as a whole it pays little attention to the cumulative effect on Capel Parish and the impact for current residents.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Capel Parish Council maintain there are other non MGB options around Paddock Wood that should be revisited, and could in combination with Brownfield development e.g. at Blantyre House in Goudhurst provide the required housing numbers without building on the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As the Parish Council representing the parish most heavily affected by this plan we should have the right to put the views of our parishioners whose views are overwhelmingly against this policy. Our view clearly has the support of our residents given the result of the recent Borough Council Election in Capel and the 'Vision For Capel' survey (part of a preparatory document for the Capel Neighbourhood Plan which is attached).

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alan and Claire Cattermole [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Golden Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Alan and Claire Cattermole [REDACTED]
Comment ID	PSLP_29
Response Date	07/04/21 11:56
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Claire Cattermole
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is sound	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

15th August 2019

Dear Sir

We are writing to you as concerned citizens and residents of Golden Green. WE are wondering why, when there is so much space in Tunbridge Wells you have found it necessary to try and impose the erection of 4,000 homes on the borders of Tonbridge. You state that you are interested in helping to maintain green belt land and ancient woodland but have chosen a site in Tonbridge borders where both of these are going to be destroyed.

How can you justify putting large expensive, unaffordable houses on land bordering Tonbridge and then using the revenue to support Tunbridge Wells facilities? Not really fair is it.

Not only is Tonbridge green belt but also in a flood plain as well as an ANOB. Are you suggesting that you erect all 4,000 home in Tonbridge borders without providing a decent system to deal with the flooding? What happens when the Medway overflows as often happens in the winter, especially around the swimming pool area and Sainsburys. Don't you think the concrete involved in erecting these houses will exacerbate the flooding situation?

I wonder how you think you are going to solve the traffic problem with the addition of a further 4,000 homes. Tonbridge is already suffering from tailbacks in both directions onto the high street much of the day. Rush hours are practically impossible to move around in. I suppose the plan is to use even more green belt land to increase the road area.

Where are those commuters in the expensive houses going to park their cars when they travel to London? Are they even going to be able to board the trains? These are often packed by the time they arrive at Tonbridge. There aren't going to be parking places at other stations are there. There has been mention of new businesses in Tonbridge but where are they? And where are they going to go if more are mooted? There was mention of a new station being built at Capel. I wonder what the situation is regarding this? Capel and Tudeley are small and charming little villages where there is the renowned church – a major tourist attraction with the Chagall Windows.

WE have heard too that there is talk of a Capel bypass. How much greenbelt land will disappear under tarmac and how many animals and natural habitats will be destroyed to achieve this aim?

Rumour has it that Tonbridge Cottage Hospital could be commandeered by the local council who will then use the land to build houses. That is a very important facility for the people of Tonbridge with many facilities, the disappearance of which would lead to more disruption.

There is talk about a new school being built opposite Somerhill Schools. How is this even possible? How is it proposed that the children get to school? This will only add to the already hugely overcrowded roads in Tonbridge. ON top of that how many children will be bussed in from other areas. Imagine the destruction to the roads!

How will the small town of Tonbridge sustain such a huge influx of people? Are there plans to knock down the High Street and rebuild?

What a shame that Tonbridge is being used to achieve the aims of Tunbridge Wells fulfilling their housing quota just because the boundary seeps over the edge – BUILDING A NEW TOWN.

Yours faithfully

Alan & Claire Cattermole

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	R G Cazalet [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	R G Cazalet [REDACTED]
Comment ID	PSLP_1683
Response Date	04/06/21 16:32
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Rosemary Cazalet
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I wish to comment on STR/SS3 and also STR/SS1

We have lived in North Tonbridge for 38 years, worked locally and educated two children in local schools. Obviously there have been many changes in the town and surrounding area over the years but nothing so drastic as the proposed developments in the Tudeley and Capel area. These, to me, seem insensitive on many levels and possibly unnecessary if TWBC recheck some of their data which may not be as up to date as it could be. There does seem to be a cynical element to this proposal sited as it is so near the borough boundary, with the obvious local amenities and the station being situated in Tonbridge rather than Tunbridge Wells who will collect the Council Tax but be relieved of the burden of the extra population and traffic.

Creating a garden settlement at Tudeley of 2,100 dwellings together with a further 2,100 at Capel will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. There will be a significant increase in traffic into Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road and generally in Tonbridge every morning.

People living in Tudeley will use Tonbridge Station for commuting and Tonbridge town services creating parking issues. The increase in traffic may be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period.

Paras 5.210 and 5.217. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. Many will have to travel for work, school etc even if many 'day-to-day requirements' can be met on site as stated. It is unrealistic to label local roads as pedestrian/cycle routes as shown on your maps due to narrowness, bends and increased traffic. Even with completely separate cycling provision cycling is likely to be within the proposed new development rather than for school, work journeys.

The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will

make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. Surely we should be learning from the flooding in Yorkshire in 2019. There will be an increase in air, light and noise pollution that will spread across the boundary into Tonbridge & Malling and create a visual scar across the landscape as the area is visible for many miles. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows). We have, over the years, had many adult language students staying here all of whom have been taken to see the Chagall windows as well as for country walks in the area with which they have been impressed.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

Para 4.125 I do not agree that 'there are exceptional circumstances' which justify the removal of land at Tudeley and East Capel from the Green Belt.

I believe that housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. TWBC is already providing more than their housing need figure in the draft Local Plan.

Para 4.52. The difference in the Local Plan allocations between Paddock Wood/Capel/Tudeley and Tunbridge Wells/Southborough/Bidborough is startling. Surely Tunbridge Wells has more capacity for expansion? Since Covid 19 work patterns have changed, office space may now be available for conversion.

The proposed Tudeley Village has been referred to as securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that you intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans. I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge. Will they actually meet TWBC's housing need which to me suggests the need of local people to find housing in the area. I suspect that this type of development is likely to be too expensive for many local people including some of the carers I currently have contact with. and is more likely to encourage commuters wishing to move from London and thus to need road and rail transport from Tonbridge.

I object to the inclusion of land in East Capel in "The Strategy for Paddock Wood" (STR/SS1)

This land is Green Belt land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel. The comment above about coalescence and the creation of a conurbation from Paddock Wood right across to Tonbridge is very relevant here, as is the land's use as a flood plain. Building here, even with flood risk mitigation and "betterment" could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the impact of climate change. As the current flooding elsewhere shows there is a lot to be learnt about the causes and the prevention of flooding and about how actions in one area can have serious effects elsewhere. This surely should, at present, be a very strong argument against building on any area of flood plain.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_1a-b

Comment

Consultee	Mr Peter Chapman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Peter Chapman [REDACTED]
Comment ID	PSLP_63
Response Date	04/05/21 10:01
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	PSLP_63_P Chapman_SI.jpg Building a town the size of Monaco will mean a new Five Oak green bypass.docx
Question 1	
Respondent's Name and/or Organisation	peter chapman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	STR1 SS3 Tudeley /Capel
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in this area all my life. Tudeley /Capel is a small rural community of around 900 homes, consisting mainly of apple orchards, and sheep and cow grazing. It is an Area of Natural beauty- concreting it over is NOT the future in a post-covid world. The local residents are universally opposed to a huge "New town" being inflicted upon them, increasing the local population by six times over. There are not the shops, trains, buses, roads, Doctors, dentists, schools to cope with such a huge population explosion.

Green Belt is Green belt – needing more housing is NOT a special circumstance to concrete over Green belt- it will turn the area into one long urban sprawl from Tonbridge through to Padock wood.

TWBC want to inflict a gigantic "New town" the size of Monaco smack bang in a section of Greenbelt. NO ONE wants this grotesque scheme except the leader of TWBC, his planning officer, and the rich land owner who will make a fortune from selling his fields. I have not spoken to a single other person who thinks this is a good idea. This is such lazy planning- rather than find smaller, more suitable brownfield sites they have plonked for one easy huge site. Lazy lazy lazy.

Having grown up here, I know from experience that this area floods badly. If an area the size of Monaco is concreted over where will future rain water run off to?

My family have enjoyed growing up here, in this rural, beautiful part of Kent. We enjoy the many walks the area offers. My children are keen to get on the property ladder but they too are horrified with new homes/affordable homes being in such huge numbers in an area they love being destroyed. Locals will in no way benefit- these new houses will attract people from LONDON NOT locals- many will commute back to London every day.

My children understand the need for more housing but they agree a huge new town just slapped on pristine green fields in Tudeley is not the future in a post covid world. Local residents will benefit in no way from this monstrous development. They will suffer DECADES of construction noise, traffic, dust, mess, hugely damaging their quality of life they cherish.

The Tudeley development is completely unsustainable.

*There is no railway station (nor ever will be) It will be totally car- centric however many bus /cycle lanes TWBC say they will build. These will be expensive home- every family will have at least two cars, pouring out towards already gridlocked Tonbridge every morning. The B2017 into Tonbridge already backed up in rush hour every day. It is a pipe dream for TWBC to say that all these thousand

of new residents will cycle to work school on a rainy cold January morning. This will just NOT happen. Tonbridge station is already packed to capacity in normal non-covid times.

* The proposed huge Tudeley development is in the middle of nowhere- there is no infrastructure in place- The sewerage /water supply requires major upgrading. The electricity supply will need upgrading. All at a cost of tens of millions of pounds.

*Local roads are little more than country lanes- TWBC propose new roads- which may not be built for many years/decades- in the meantime thousands of cars with no where to go apart from gridlocked Tonbridge, a medieval market town that cannot be extended with new roads- there is no space. Any new road into Tonbridge has no where to go- it will just jam up close to Tonbridge as it does now- this problem cannot be solved- this is the WRONG place for a huge new housing development.

Tonbridge Borough council were only consulted late in the planning process. This development lies right on the edge of Tonbridge. Tunbridge Wells residents will be totally unaffected by thousands of new homes whilst Tonbridge residents will suffer gridlock- packed roads, no town parking, packed trains into London. A huge development on the edge of Tonbridge is crazy! Very poor engagement with local residents and local council. (Tonbridge)

If the development is built a new road bypassing Five Oak green is proposed- This will carve a hideous dual carriage way across yet MORE Green belt- these beautiful fields are currently used for farming and grazing.

Air quality will suffer hugely- thousands of cars in use every day, thousands of central heating boilers, all polluting daily- sustainable???

Democracy?? TWBC are determined to ram this grotesque scheme through- They have totally ignored the opinions of local residents whose lives will be ruined/changed for decades to come. They did not consult with Tonbridge Borough Council until late in the planning process. Tonbridge Council are alarmed how their town will be over whelmed.

TWBC refuse to consider more suitable area to develop such as Castle Hill- much of the infrastructure is already there- particularly roads.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

TWBC have NOT considered alternative site for development, such as castle Hill, or other brown field site that wil inevitably appear in a post-covid world.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Unsustainable- No infrastructure in place without spending tens of Millions on new infrastructure- inadequate roads, inadequate water/sewage, inadequate drainage leading to even more flooding. Thousands of polluting cars pouring into already gridlocked Tonbridge every morning. The New Town will have NO SHOPS initially, possibly for years. All residents will have to drive into Tonbridge for just a pint of milk! No supermarkets have agreed to locate in the "New Town" No railway station- EVER says network Rail

If the New Town is built, a new bypass is proposed for Five oak green- possibly a dual carriage way- this is literally where it will run across this field.....seriously? They want to build a road across this bucolic Green belt countryside?? See pic below

TWBC say they will build new roads to Tonbridge- There is no space for new roads. Tonbridge is already gridlocked.

If you would like to attach a file in support of your comments, please upload it here.

[Building a town the size of Monaco will mean a new Five Oak green bypass.docx](#)

If you would like to attach a file in support of your comments, please upload it here.

[PSLP 63 P Chapman SI.jpg](#)

Supporting Information File Ref No: SI_55

Comment

Consultee	Olivia Glenn [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Charterhouse Strategic Land Ltd
Address	Charter House 3a Felgate Mews London W6 0LY
Event Name	Pre-Submission Local Plan
Comment by	Charterhouse Strategic Land Ltd [REDACTED] [REDACTED]
Comment ID	PSLP_1024
Response Date	02/06/21 12:44
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	PSLP_1014_Charterhouse Strategic Land Representation_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Charterhouse Strategic Land
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: This representation has been input against Policies STR 1, STR 2, STR 3, STR 4, STR 5, STR 6, STR 7, STR 8, STR 9 & STR SS 1 – see Comment Numbers PSLP_1014, PSLP_1016 -1024. A full copy of the representation can be found on attached Supplementary Information]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Re: TUNBRIDGE WELLS BOROUGH COUNCIL PRE-SUBMISSION LOCAL PLAN: REGULATION 19 CONSULTATION

I write in response to your publication of the Tunbridge Wells Borough Council Pre-Submission Local Plan ("**Local Plan**"). Charterhouse Strategic Land ("**Charterhouse**") welcomes the opportunity to review and comment on the new Local Plan and trust that the important matters set herein will be given detailed consideration.

Context

Charterhouse has an interest in the Land lying to the west of Nursery Road, Paddock Wood. The site is situated to the north west of Paddock Wood Train Station and the west of Maidstone Road.

Representations

This representation responds to the policies within the Local Plan published for consultation Friday 26th March to Friday 4th June 2021. We wish to make some preliminary observations on the policies in regards to their compliance with the relevant legal requirements as set out in the Planning and Compulsory Purchase Act 2004 as amended, and the tests of soundness as per Paragraph 35 of the National Planning Policy Framework ("**NPPF**").

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework"*

Charterhouse comments on specific Pre-submission Local Plan Policies

Policy STR/SS 1 – The Strategy for Paddock Wood, including land at east Capel

Charterhouse's land sits within the western parcel of the STR/SS 1 boundary. We support the policy in the principle of 3,490-3,590 houses, and furthermore we are/SS glad to see the councils explicit inclusion into the policy of the potential necessity of equalization. However, we express concerns over the lack of appropriate infrastructure provisions and the mechanisms by which this will be provided, without this in place we fear that the delivery of STR/SS 1 may be compromised.

David Lock Associates Ltd ("**DLA**") structure plan (Map 28) shows Charterhouse's land holding as Green & Blue Strategic Landscape Corridors with Pedestrian/Cycle Routes intersecting the site. As per section 9;

"9. Provide walking and cycling linkages within the site, together with links to Paddock Wood town centre, employment areas, and surrounding countryside. Development in the eastern parcel, shown as land edged in yellow on Map 27, should make use of, and enhance, the Hop Pickers Trail;"

The allocation of Charterhouse's site as a landscape corridor with a provision for pedestrian/cycle, this will be instrumental in delivering walking and cycling linkages into Paddock Wood town centre. This is vital to ensuring the sustainability, connectivity and "*High standard of design and layout*" as set out in the policy.

Charterhouse's land holding has the ability to ensure that the high quality placemaking agenda which the council is seeking to achieve is delivered via pedestrian and cycling routes. The Town and Country Planning Association ("**TCPA**") define one of the eight key principles of new garden villages as;

"Planned for healthy living: Planning for healthy communities is integral to the creation of new places today. New garden villages should foster healthy and active communities by encouraging walking and cycling (emphasis added) and by providing a comfortable, stimulating and therapeutic environment, bringing together the best of the urban and natural environments, for people of all ages. Key considerations for active design and a more detailed examination of how to plan for healthy communities in new Garden Cities are set out in the TCPA's Guide 8: Creating Health-Promoting Environments"

Within the TCPA's Garden City Standards for the 21st Century – Guide 13 Sustainable Transport they reiterate the impact of car usage upon the environment and that new built environments must be 'people focused' not vehicle focused'. When creating new built environments such as the urban extension at Paddock Wood, the council and developers have an opportunity to create a settlement in which active transport is at the heart. Moving away from vehicle based travel and facilitating cycling, walking and public transport as the primary forms of transport by ensuring that we are 'tipping the balance' in favour of sustainable transport modes as clear, easy and preferred option. Charterhouse would like the council to ensure that active and sustainable travel is enshrined within the policy STR/SS1.

We thank the council for the opportunity to comment and would be grateful if you will confirm safe receipt of this representation.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, Not Stated data inputter to tick 'not stated' box.

Comment

Consultee	Mr Graham Clark [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tunbridge Wells [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Graham Clark [REDACTED]
Comment ID	PSLP_49
Response Date	21/04/21 21:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Graham Clark
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not effective

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The proposal to allocate land for housing development to the west of Paddock Wood flies in the face of Government advice contained in the NPPF and indeed to approved policies in the adopted Tunbridge Wells Core Strategy (2010).

The NPPF states:

Para 155: 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).'

Para 158: 'The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.'

The Adopted Core Strategy states:

Para 2.11: 'The Borough has a high-quality environment, which could be affected by future climate change. The impacts of climate change may be felt within the Borough by increased frequency and severity of weather events, such as flooding and extreme temperatures'....and

Core Policy 5: 'All new developments will be expected to....be located in accordance with the PPS25 sequential test, generally outside of the Borough's high-risk flood zones'

Paragraph 5.112 recognises that Paddock Wood is 'particularly high risk and in accordance with the sequential test and principles of PPS25, development will generally be steered away from areas of greatest risk'.

Much of the land to the west of Paddock wood is in Flood Zones 2 and 3. Indeed, it forms part of one of the largest alluvial flood plains in Kent, where the rivers Teize, Medway and Beult converge.

Flood Zone 3 is land having a 1 in 100 or greater annual probability of river flooding.

Flood Zone 2 is land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding. In this zone vulnerable development, which include housing, should be avoided. With global warming the incidence of flooding might well be worsen over time.

Much of the land shown for housing to the west of Paddock Wood either adjoins Flood Zone 3 or is actually in Flood Zone 2.

What is worrying is that the Council is being disingenuous about all of this. The Key Diagram fails to identify the land covered by Flood Zone 2.

The NPPF and the Core Strategy is clear that development in areas at risk of flooding should be avoided. The NPPF advises that all plans should apply a risk-based approach to the location of development and consider current and future impacts of climate change so as to avoid flood risk to people and property. To put it bluntly, the aim of the sequential test is to steer new development to

areas with the lowest risk of flooding. Over 90% of the Borough is outside of any flood zone. Clearly, the Plan fails to apply this test.

In addition, the northern part of the allocation is protected by the Leigh Flood Storage and Barrier. This has struggled to cope with recent flood events and there are proposals to upgrade this facility. If this was ever to fail, for whatever reason, the impact upon the northern part of the allocation could be severe.

Finally, has the Council consulted with lenders and insurers to see whether this proposal is acceptable from their perspective

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan should be modified to delete all of the allocations for residential development on land to the west of Paddock Wood.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Michael Conrad-Pickles [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Michael Conrad-Pickles [REDACTED]
Comment ID	PSLP_22
Response Date	05/04/21 11:22
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Michael Conrad-Pickles
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Inset Map 4	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not positively prepared

Question 5

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Unequal distribution

Paddock Wood has been unfairly targeted with the housing target percentage. There seems to be no formula to provide an equal share of the housing across the Borough. This can only imply that the borough does not wish to have a multitude of complaints regarding the green belt destruction and wish to focus their defense efforts on one town only.

Flooding

It is apparent, even from the mapping of the housing extension, that the new developments are planned to be built on flood plain areas. There are several aspects of this I wish to highlight.

- 1 Paddock Wood topography means that it is the lowest point in the surrounding area. This causes rainfall to run into the plain from the surrounding hills.
- 2 Paddock Wood is on clay soil. Clay is good at soaking up rain but when it is saturated, it cannot soak any more water up and the water builds up and builds up. I have photographic evidence from the past several years of water-covered fields where new developments are planned.
- . The development is planned to be surrounding various brooks within the area. In particular Tudeley Brook. I have videos and photos of the bank at breaking point during extreme weather events.
- . Extreme weather. The government has set out to be carbon neutral from 2050. This implies that for the next 30 years, excess carbon will be going into the atmosphere. Excess carbon is creating extreme weather events which local drainage networks cannot cope with. For example, within Paddock Wood, January 2021 saw a 100% above average (1989 -2010) rainfall which causes huge excess surface water and weeks of standing water in fields on which the development is planned
- . In case of efficient drainage systems, the water still needs to go somewhere. The drainage leads to the River Medway and into the existing town. Clearly, with no fields to take up the excess water, any excess water will find its way into the existing town, where the drainage system is inadequate, and also into the River Medway which could be overcome and Tonbridge would flood.
- . Existing housing. Whilst any new developments may be built with floodproofing in mind (i.e. ground floor level above one meter), how can this help existing houses within the town, in particular the Victorian houses which have not been designed to withstand flooding events?

Traffic

Paddock Wood does not have the infrastructure to cope with an additional 5,000 houses. Even with an additional school, doctors, dentists etc, the road system could not cope. Years upon years of lack of funding to improve cycling/bus access within the area has caused a massive increase in car dependency. All new developments will create additional car dependency. Paddock Wood has lost most of its town center. Indeed as I write, another section is being lost to retirement homes. This will inevitably require excess traffic on our roads for residents having to travel by car to visit town centers (Tonbridge Wells/Tonbridge).

As highlighted within the local plan report and I quote “Air quality is given a mixed score as the proposals pose a high risk to deterioration of local air quality. Traffic will increase substantially...”

Green Belt/Nature

The government has expressed a promise to improve nature within this country. The UK is one of the most nature-depleted countries in the world. The location of the proposed developments does not allow for nature to survive. In one plot, nature is surrounded by the B201, the A228, a railway, and the town itself. Where do the developers propose where the nature that lives here goes? There is an element of pure hypocrisy from the planners and those councilors who agree to this. This week, a campaigning letter was received from Andrew Kennedy, Conservative and I quote “to save our green belt from the never-ending demands of speculative developers”.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The local plan should be equally spread across the borough in terms of housing growth, at present there is an unjustifiable growth placed on Paddock Wood. There is no evidence that all brownfield sites have been thoroughly assessed to provide adequate housing. There is no evidence that the area can sustain the additional water requirements in consideration of future climate change drought events.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

All comments have been made in my initial statement, therefore please refer to this.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
--	--

Supporting Information File Ref No: SI_155

Comment

Agent	Matthew Porter ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	DHA Planning Ltd
Address	- Maidstone -
Consultee	([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Countryside Properties
Address	Countryside House The Drive BRENTWOOD CM13 3AT
Event Name	Pre-Submission Local Plan
Comment by	Countryside Properties ([REDACTED])
Comment ID	PSLP_2160
Response Date	03/06/21 11:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	DHA Planning for Countryside Properties-full representation STR-SS1.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Countryside Properties
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: the full representation attached has been divided between Policy STR/SS1 (PSLP_2160), Vision and Strategic Objectives (PSLP_2161), Policy STR1 (PSLP_2162) and Development Management Policies (PSLP_2163)]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Countryside Properties (hereafter referred to as Countryside) in respect of the Tunbridge Wells Borough Council Regulation 19 Local Plan consultation.

1.1.2 These representations relate to land at Church Farm, Church Road that forms part of the strategic expansion of Paddock Wood (STR/SS1).

1.1.3 The site is allocated in the current Local Plan (Site Allocations Local Plan 2016, AL/PW3A) and is within the 'Limits of Built Development'.

1.1.4 Outline planning permission for 300 dwellings and a new country park, together with associated highways, landscaping, allotments, flood mitigation works including attenuation basins and open space was granted by Tunbridge Wells Borough Council (TWBC) in February 2018 for (reference: 14/504140/HYBRID).

1.1.5 A Reserved Matters application (reference: 19/03655/REM) for the full 300 dwellings was approved by TWBC in July 2020 on part of the site. This approved the full 300 dwellings, but on only part of the developable area. The consented 300 unit development has recently been implemented and is underway.

1.1.6 As part of the overall masterplanning and detailed design process, the reserved matters application identified that an increase in residential density across parts of the site was appropriate, and as such identified a future area of potential additional development within the scheme for a later stage. As such, there is the opportunity to make efficient use of the land available and utilise it to provide further

residential development without a reduction in the overall country open space provision and within the area originally envisaged for residential development.

1.1.7 Following pre application advice discussions with TWBC and due to changes resulting from recent planning case law, it is no longer permissible to seek to vary the description of a planning permission through a Section 73 application. Therefore, Countryside Properties have submitted a standalone detailed planning application for the construction of a further 60 dwellings on the site known as phase 2.

1.1.8 Whilst this application has the potential to overtake the Local Plan process, this representation is submitted in parallel to demonstrate that the land as a whole is Countryside.

1.1.9 Based on the current national and local planning context, we consider this site to be suitable for such additional development.

1.2 Local Plan Background

1.2.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.2.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.2.3 This submission comment on the plan having regard to these tests of soundness as well as wider legal compliance.

1.3 Legal Compliance

1.3.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.3.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.3.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.4 Assessment of Soundness

1.4.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.4.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.4.3 This representation comments on the following elements of the plan:

• Vision and Strategic Objectives; • Development Strategy and Strategic Policies; • Place Shaping Policies; and • Development Management Policies.

Place Shaping Policies

1.4.68 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

1.4.69 Policy STR/PW 1 sets the Strategy for Paddock Wood and states that approximately 3,490-3,590 dwellings and accompanying infrastructure will be delivered via the planned extension to Paddock Wood.

1.4.70 Policy STR/SS1 sets the detailed strategy and states:

[TWBC: PSLP Policy STR/SS1 duplicated here - see full representation attached].

[TWBC: for Extract of proposed proposal map for Paddock Wood see full representation attached].

1.4.71 An area of open green space is included within the original hybrid application which extends around the northern, eastern and western boundaries of the site. The details of the landscaping of this area have been agreed pursuant to the conditions and S106 of the hybrid planning permission for the site. The Phase 2 element does not seek to amend the extent of this area. The emerging Local Plan seeks the formal allocation of the green space as Local Green Space under Policy EN15. Policy EN15 states:

[TWBC: PSLP Policy EN15 duplicated here - see full representation attached].

Site Specific Policy Response Church Farm Phase 2

1.4.72 The inclusion of the wider Church Farm site within the strategic allocation for Paddock Wood (STR / SS1) is generally welcomed and its acknowledgement as a strategy site is supported.

1.4.73 However, the Plan no longer proposes to include individual site allocations within the strategic development area and, in doing so, the strategic allocation does not distinguish between the additional potential development at Church Farm (which would be entirely contained within the consented and implemented 'Phase 1' element (300 units) and the wider 'Eastern Parcel'; the area of STR/SS1 washes entirely over the consented and implemented area and the proposed Phase 2 area alike.

1.4.74 Whilst the aims and objectives of the Paddock Wood Strategic Allocation STR/SS1 are supported, our client objects to the current policy wording in that it does not adequately deal with the specifics of the Church Farm site, namely:

(1) That the site is distinct from the other parts of the strategic allocation STR/SS1 in that the 'Phase 1' element is consented and implemented. This should be recognised in the Plan and the accompanying policies map; (2) That the Church Farm Phase 2 site is specifically suitable and available for an additional phase of development for c.60 residential units (as is shown in the current planning application for this element). This should be specifically referenced in the Plan and on the accompanying policies map and Map 28;

(3) That the Phase 2 element is physically distinct from the wider Paddock Wood strategic allocation (beyond the existing limits of built development) because of the fact that the consented 'Phase 1' element has been implemented; (4) That the Phase 2 element should therefore not be subject to the same requirements as the greater areas of land outside the current Limits of Built Development (e.g. land to the east of Church Farm) in terms of: (a) STR/SS1 (5) in respect of proposals being subject to design review panel; the Phase 2 element will naturally follow the form and design of the consented and implemented Phase 1 element and will not have wider impacts in terms of the design (being entirely surrounded by the consented development. The requirement for the input of the design review panel should not be mandatory in all cases and the requirement should take account of individual circumstances. This aspect of the policy should be reworded as it relates to Church Farm Phase 2; (b) STR/SS1 (8) in respect of the proposals providing transport infrastructure as part of the wider masterplanned strategic allocation, particularly as the Church Farm Phase 2 element would utilise the same access (vehicular, pedestrian and cycle) as the consented and implemented development in

which it is entirely contained; this element of STR/SS1 should be reworded to acknowledge that the Church Farm Phase 2 element cannot physically provide for additional connections to the Town Centre, for example (as the connections have already been established by the wider Phase 1 consent);(c) Requiring the site to 'be delivered through' the eastern parcel masterplan; the site is distinct from the areas of potential development to the east within the Eastern Parcel, outside of the current limits of built development. This element of the policy should be reworded to acknowledge that the Church Farm Phase 2 site is distinct from the other parts of the Eastern Parcel and should not therefore be subject to the masterplanning requirements of that area.

1.4.75 Whilst the objective of STR/SS1 to avoid 'piecemeal development' within the strategic area is supported, the Plan should be updated to acknowledge that, because of its unique nature, the Church Farm Phase 2 site is capable of being delivered separately and independently of the wider Eastern Parcel.

1.4.76 Our client considers that the above points would be best remedied through the inclusion of an individual site allocation for Church Farm Phase 2, separate from the wider STR/SS1 'Eastern Parcel'.

1.4.77 Notwithstanding, the proposed allocation of the open green space (to the extent approved by planning permission 14/504140/HYBRID (and later detailed in the details pursuant to the conditions to that consent) as Local Green Space (EN15) is supported.

1.5 Summary and Conclusions

1.5.1 In summary, this representation has been prepared on behalf of Countryside Properties in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.5.2 We support the aspiration to meet housing need in full and consider that a dispersed growth strategy represents the optimum means to achieve this. Nonetheless, we consider that the Local Plan strategy relies heavily on the delivery of Tudeley Village and the overly optimistic projections to the delivery of housing proposed.

1.5.3 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, but we require amendments to the policy wording for policy STR/SS1 and to Map 28 to make it clearer that Church Farm is a consented and implemented site and that the Phase 2 element is distinct from the wider STR/SS1 Eastern Parcel (being the areas which outside of the current Limits of Built Development). The Plan should reflect the potential for the Church Farm Phase 2 element to be delivered in advance of the other parts of the Eastern Parcel in a form that reflects its physical position contained within a consented and implemented development. This could be achieved by means of a separate site allocation policy for Church Farm Phase 2 and amendments to the Policies Map and Map 28.

1.5.4 We also object to the detail of some of the development management policies as set out above, which we are concerned unnecessarily replicate the NPPF, whilst providing detail which could have the unwanted side effect of unnecessarily limiting and frustrating beneficial development.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_130

Comment

Agent	Matthew Porter [REDACTED]
Email Address	[REDACTED]
Company / Organisation	DHA Planning Ltd
Address	- Maidstone -
Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Countryside Properties
Address	Countryside House The Drive BRENTWOOD CM13 3AT
Event Name	Pre-Submission Local Plan
Comment by	Countryside Properties [REDACTED]
Comment ID	PSLP_1962
Response Date	03/06/21 11:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1962_DHA Plg for Countryside Properties_full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Countryside Properties
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Countryside Properties (hereafter referred to as Countryside) in respect of the Tunbridge Wells Borough Council Regulation 19 Local Plan consultation.

1.1.2 These representations relate to land at Church Farm, Church Road that forms part of the strategic expansion of Paddock Wood (STR/SS1).

1.1.3 The site is allocated in the current Local Plan (Site Allocations Local Plan 2016, AL/PW3A) and is within the 'Limits of Built Development'.

1.1.4 Outline planning permission for 300 dwellings and a new country park, together with associated highways, landscaping, allotments, flood mitigation works including attenuation basins and open space was granted by Tunbridge Wells Borough Council (TWBC) in February 2018 for (reference: 14/504140/HYBRID).

1.1.5 A Reserved Matters application (reference: 19/03655/REM) for the full 300 dwellings was approved by TWBC in July 2020 on part of the site. This approved the full 300 dwellings, but on only part of the developable area. The consented 300 unit development has recently been implemented and is underway.

1.1.6 As part of the overall masterplanning and detailed design process, the reserved matters application identified that an increase in residential density across parts of the site was appropriate, and as such identified a future area of potential additional development within the scheme for a later stage. As such, there is the opportunity to make efficient use of the land available and utilise it to provide further residential development without a reduction in the overall country open space provision and within the area originally envisaged for residential development.

1.1.7 Following pre application advice discussions with TWBC and due to changes resulting from recent planning case law, it is no longer permissible to seek to vary the description of a planning permission through a Section 73 application. Therefore, Countryside Properties have submitted a standalone detailed planning application for the construction of a further 60 dwellings on the site known as phase 2.

1.1.8 Whilst this application has the potential to overtake the Local Plan process, this representation is submitted in parallel to demonstrate that the land as a whole is Countryside.

1.1.9 Based on the current national and local planning context, we consider this site to be suitable for such additional development.

1.2 Local Plan Background

1.2.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.2.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.2.3 This submission comments on the plan having regard to these tests of soundness as well as wider legal compliance.

1.3 Legal Compliance

1.3.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.3.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.3.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.4 Assessment of Soundness

1.4.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.4.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.4.3 This representation comments on the following elements of the plan:

• Vision and Strategic Objectives; • Development Strategy and Strategic Policies; • Place Shaping Policies; and • Development Management Policies.

Site Specific Policy Response Church Farm Phase 2

1.4.72 The inclusion of the wider Church Farm site within the strategic allocation for Paddock Wood (STR / SS1) is generally welcomed and its acknowledgement as a strategy site is supported.

1.4.73 However, the Plan no longer proposes to include individual site allocations within the strategic development area and, in doing so, the strategic allocation does not distinguish between the additional potential development at Church Farm (which would be entirely contained within the consented and implemented 'Phase 1' element (300 units) and the wider 'Eastern Parcel'; the area of STR/SS1 washes entirely over the consented and implemented area and the proposed Phase 2 area alike.

1.4.74 Whilst the aims and objectives of the Paddock Wood Strategic Allocation STR/SS1 are supported, our client objects to the current policy wording in that it does not adequately deal with the specifics of the Church Farm site, namely:

(1) That the site is distinct from the other parts of the strategic allocation STR/SS1 in that the 'Phase 1' element is consented and implemented. This should be recognised in the Plan and the accompanying policies map; (2) That the Church Farm Phase 2 site is specifically suitable and available for an additional phase of development for c.60 residential units (as is shown in the current planning application for this element). This should be specifically referenced in the Plan and on the accompanying policies map and Map 28;

(3) That the Phase 2 element is physically distinct from the wider Paddock Wood strategic allocation (beyond the existing limits of built development) because of the fact that the consented 'Phase 1' element has been implemented; (4) That the Phase 2 element should therefore not be subject to the same requirements as the greater areas of land outside the current Limits of Built Development (e.g. land to the east of Church Farm) in terms of: (a) STR/SS1 (5) in respect of proposals being subject to design review panel; the Phase 2 element will naturally follow the form and design of the consented and implemented Phase 1 element and will not have wider impacts in terms of the design (being entirely surrounded by the consented development. The requirement for the input of the design review panel should not be mandatory in all cases and the requirement should take account of individual circumstances. This aspect of the policy should be reworded as it relates to Church Farm Phase 2; (b) STR/SS1 (8) in respect of the proposals providing transport infrastructure as part of the wider masterplanned strategic allocation, particularly as the Church Farm Phase 2 element would utilise the same access (vehicular, pedestrian and cycle) as the consented and implemented development in which it is entirely contained; this element of STR/SS1 should be reworded to acknowledge that the Church Farm Phase 2 element cannot physically provide for additional connections to the Town Centre, for example (as the connections have already been established by the wider Phase 1 consent); (c) Requiring the site to 'be delivered through' the eastern parcel masterplan; the site is distinct from the areas of potential development to the east within the Eastern Parcel, outside of the current limits of built development. This element of the policy should be reworded to acknowledge that the Church Farm Phase 2 site is distinct from the other parts of the Eastern Parcel and should not therefore be subject to the masterplanning requirements of that area.

1.4.75 Whilst the objective of STR/SS1 to avoid 'piecemeal development' within the strategic area is supported, the Plan should be updated to acknowledge that, because of its unique nature, the Church Farm Phase 2 site is capable of being delivered separately and independently of the wider Eastern Parcel.

1.4.76 Our client considers that the above points would be best remedied through the inclusion of an individual site allocation for Church Farm Phase 2, separate from the wider STR/SS1 'Eastern Parcel'.

1.4.77 Notwithstanding, the proposed allocation of the open green space (to the extent approved by planning permission 14/504140/HYBRID (and later detailed in the details pursuant to the conditions to that consent) as Local Green Space (EN15) is supported.

Development Management Policies

1.4.78 In addition to our comments on the strategy, we have reviewed the proposed replacement development management policies as set out in chapter 6 of the document.

1.4.79 In general terms, we would refer back to paragraph 15 of the NPPF that promotes succinct and up-to-date plans, which provide a positive vision.

1.4.80 As a general comment, there are large numbers of policies that effectively seek to provide a localised policy approach that mirrors the NPPF. For example, good design, protection of heritage assets etc. Not only are these policies repetitive, but many are of such prescriptive detail that they are neither positively prepared nor flexible enough to allow for a range of different circumstances. Furthermore, many aspirations result in inevitable conflict. On this basis, we would recommend that the majority of proposed policies are deleted where they offer nothing beyond the guidance already contained in the NPPF. This will also avoid the plan being quickly rendered out of date in the event of a change to the NPPF.

1.4.81 Turning to detailed policies, there are a number of contradictory elements that need to be remedied. For example, policy EN1 seeks to ensure development must respect the established character and surrounding form. However, policy EN3 places significant emphasis on measures to radically reduce greenhouse gas emissions.

1.4.82 The provision of a step change towards more sustainable construction and climate change is, inevitably going to result in a need for a change in attitude towards design, material and construction. Accordingly, a cohesive policy approach is needed that allows innovative and different design if supported on wider environmental and planning grounds. As drafted the policies fail to be succinct and instead are overly prescriptive.

1.4.83 A number of policies also seek to provide guidance rather than policy. For example, policy EN4 seeks to clarify what information is needed in order to assess a heritage proposal. This level of information is already established via the NPPF and should instead feature within a support SPD not policy.

1.4.84 Turning to housing policies, policy H2 states that development should make efficient use of land, having full regard to the context of the site, including its character, landscape setting, topography, surrounding built form, and access to infrastructure and services.

1.4.85 In our view, this policy adds nothing beyond the advice contained in the NPPF and therefore adds little. It also goes against the principle of preparing succinct Local Plans.

1.4.86 Policy H3 sets out affordable housing requirements. Whilst we support the general thrust of the objectives and the securing of affordable provision, we object to the rounding up of the calculations and contributions being based on a net rather than gross number of units. For small scale proposals this will often see the proposed percentage increase to closer to 45% and 35% respectively. Such thresholds would therefore need to be tested and justified by evidence. A pragmatic approach would be to apply traditional rounding up or down.

1.4.87 The phasing of affordable provision also needs to be sufficiently flexible so as to not prohibit wider delivery. In this regard, we consider that entering into contract with a registered affordable provider ahead of the 50% occupation should provide the certainty of delivery, but without risking a wider delay in market delivery. The timing of affordable delivery should also be dictated by scale, size and type of site.

1.4.88 The Council will be aware of wider country wide discussions regarding the viability of providing social rented accommodation as part of a wider offer. Such provision is becoming increasingly difficult and without robust policy in place that addresses this matter, this matter is likely to significantly slow delivery.

1.4.89 In summary, whilst this overview is not exhaustive, we do have concerns about the nature of the proposed policy framework and the degree to which it appears to be trying to limit and frustrate development. Accordingly, in the interests of positive planning, we recommend that the policy framework is simplified and refined and subject to further detailed consultation and focussed on planning matters.

1.5 Summary and Conclusions

1.5.1 In summary, this representation has been prepared on behalf of Countryside Properties in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.5.2 We support the aspiration to meet housing need in full and consider that a dispersed growth strategy represents the optimum means to achieve this. Nonetheless, we consider that the Local Plan strategy relies heavily on the delivery of Tudeley Village and the overly optimistic projections to the delivery of housing proposed.

1.5.3 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, but we require amendments to the policy wording for policy STR/SS1 and to Map 28 to make it clearer that Church Farm is a consented and implemented site and that the Phase 2 element is distinct from the wider STR/SS1 Eastern Parcel (being the areas which outside of the current Limits of Built Development). The Plan should reflect the potential for the Church Farm Phase 2 element to be delivered in advance of the other parts of the Eastern Parcel in a form that reflects its physical position contained within a consented and implemented development. This could be achieved by means of a separate site allocation policy for Church Farm Phase 2 and amendments to the Policies Map and Map 28.

1.5.4 We also object to the detail of some of the development management policies as set out above, which we are concerned unnecessarily replicate the NPPF, whilst providing detail which could have the unwanted side effect of unnecessarily limiting and frustrating beneficial development.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_522
Response Date	27/05/21 16:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

CPRE Kent notes the detailed work which has gone into the Structure Report and Plan for the urban extension at Paddock Wood and east Capel together with the constructive parcelling of individual sites to form clear parcels for masterplanning. In line with the approach taken in the Strategic Sites Masterplanning and Infrastructure Study, we have included policies STR/SS2 and STR/PW 1 in our review of the STR/SS1 as policies for the Paddock Wood town centre and the wider built-up area form an integral part of the masterplanning. We have commented below on specific points within the Policy.

We do, however, remain concerned by the loss of green belt land resulting from this development and by the low density of housing on what are primarily greenfield sites around the perimeter of the Paddock Wood town.

We are also seeking assurance on how the delivery risk for this strategic site will be managed. Over one third of the homes to be delivered by this local plan are at Paddock Wood. If delivery at any of the parcels stalls, housing need will not be met as predicted in the Council's housing trajectory.

We note that the extension of the key employment area at Paddock Wood may provide opportunities for new residents to work close to home, while the existing retail and service provisions in Paddock Wood town centre will meet needs beyond those delivered by the new neighbourhood centres. CPRE strongly supports the aim of reducing private car journeys and therefore welcomes the provision of walking and cycling to Paddock Wood town centre and the Key Employment Area as well as within the sites. We also recognise that this development has the merit of being close to a railway station, enabling sustainable travel to a wide variety of destinations to be a realistic option.

We note that the preamble to this policy suggests that the new Tudeley garden settlement will contribute to the opportunity for ambitious investment into the Paddock Wood town centre. Is that development expected to make financial contribution to the Paddock Wood town centre regeneration plan or is this simply based upon the expectation of increased economic activity for Paddock Wood businesses?

We conclude that there appears to be the opportunity for organic growth of the town through the urban extension, in much the same way as local hop-growing drove previous growth. However, we are not convinced that a number of critical infrastructure issues have been fully addressed.

The Infrastructure Delivery Plan (March 2021) states "Additional waste water treatment capacity required over the Plan Period to be determined" and identifies some works and their associated costs. It is critical that there is a full understanding of what additional waste water treatment capacity is required and the cost. Unless there is clear evidence that the necessary infrastructure will be provided *before* the new dwellings are inhabited, this allocation should not be permitted. The capacity issues were well known even before the previous Local Plan consultation and Greg Clark MP for Tunbridge Wells raised them in a parliamentary debate on 28 October 2019. It is surprising that there still seems to be some uncertainty about the way forward.

The road system in the centre of Paddock Wood needs to be improved. There needs to be additional public parking space and/or new, very frequent public transport from the surrounding villages (including East Peckham in Tonbridge & Malling and Yalding, Laddingford and Collier Street in Maidstone) - as Paddock Wood lies at the junction of three boroughs - to ensure that the residents of outlying villages who will continue to need to rely on Paddock Wood as their local service centre are not excluded by the vehicles from the additional 3,500 dwellings. We note that Policy STR/SS2 requires provision of new/replacement car parks and seek assurance that this will also provide secure cycle parking.

The Transport Connections maps indicate that inter-settlement cycle routes will align with existing roads. Given the serious dangers of cycling on rural roads if there is no off-road or segregated cycle provision, these will be of little use to Paddock Wood residents. There need to be costed, funded proposals to provide much better, largely off-road cycling routes, and for the Council to use its compulsory powers to create them.

CPRE Kent also seeks reassurance that aspirations for a post-plan railway station serving Tudeley garden settlement will not prevent/preclude improvements to the rail service envisaged in the Kent Rail Strategy 2021.

Efficient Use of Land

CPRE Kent does not consider that the proposed development makes efficient use of land as required by the NPPF. Our comments on Strategic Policies STR1, STR2, STR3 and STR4 make clear why we consider that achieving high density of development is of critical importance.

Paragraph 4.34 of the Strategic Sites Topic Paper (March 2021) states that average density for the 3,450 dwellings at Paddock Wood and East Capel would be between 35-38dph based on 91ha of residential land. We are very concerned at this low density and suggest that it needs to be increased to a density appropriate for its context as an urban extension rather than fantasising that it will remain rural even after it has been built on. A higher density would also require less land take.

Higher density housing does not need to be ugly. Some of the most desirable properties in Royal Tunbridge Wells 'village area' are terraces and other clustered dwellings – the now-valued high density housing of the past. Even in modern developments, a village atmosphere can be successfully created with terraces, maisonettes and other three to four storey developments forming an attractive part of the development. More compact forms of development can assist in delivering a complete and connected neighbourhood where people can meet their everyday needs within a short walk or cycle.

Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) (see web link) concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

The National Design Codes consultation (January 2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph.

Agricultural Land

Paragraph 170(b) of the NPPF requires planning decisions to contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land. With paragraph 170b, footnote 53 stating that “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.” The allocation includes Grade 2 and 3 agricultural land – which is at least in part best and most versatile land. There appears to be no evidence that the Council has sought to identify areas of poorer quality agricultural land for development.

As set out in our response to policy EN20, agricultural land is important in preserving the means to provide a reliable food source with low food miles and high animal welfare. Recent events have demonstrated the importance of maintaining home-grown food supply. The relatively small fields of the High and Low Weald, with their hedgerows that provide shelter, are particularly well suited to

providing grazing for non-intensive livestock farming, as well as the fruit and vegetables of the 'Garden of England'.

Agricultural land also has a vital role to play in absorbing carbon and preserving biodiversity, including the biodiversity in soils. Once it is built over the soil biodiversity is lost.

This is a precious and finite resource that must not be wasted - yet another reason why any development at this site must be at a much higher density and in a more compact form than currently proposed.

Green belt release

It is noted that the policy provides for the release of 148ha of land from the green belt at Paddock Wood.

Given that a large part of the borough is not green belt it is felt that the disproportionate loss of green belt in this location (which sits at the eastern most extremity of the large swathe of green belt east of the A26 running from Watlingbury to Tunbridge Wells) would undermine the five purposes for green belt designation as set out in paragraph 134 of the NPPF.

The Green Belt Study Stage Three Assessment of Green Belt allocations (November 2020) confirms that development in the green belt at Paddock Wood would result in high harm.

CPRE Kent is firmly of the view that green field development should be the last option and that brownfield sites should be developed first. All development, whether it be on sustainably located brownfield sites, or on green fields should be built at higher than low suburban development densities, so green field land take is kept to an absolute minimum.

CPRE Kent is concerned that the Council does not intend to designate additional land as replacement green belt.

CPRE Kent considers that replacement green belt should be designated at Paddock Wood, in order to ensure that future residents have access to green spaces that will have green belt protection.

It is not clear from policy STR/SS1 what the specific compensatory improvements to environmental quality and accessibility of the remaining green belt are, in addition to the general requirements/criteria for the proposed development. What compensatory improvements are being specifically sought compared to other developments that don't result in release of green belt land? The proposed flood mitigation would, we suggest, be necessary for the proposed development in any case and hence should not count as compensatory improvements for the loss of green belt.

Assurances are sought as to how compensatory improvements to environmental quality and accessibility of the remaining green belt will actually be delivered. This should be explicitly confirmed in the wording of the policy.

Flood Risk

Paragraph 149 of the NPPF places an onus on the Council to ensure that it takes "a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for flood risk".

A high proportion of the land in this proposed allocation lies in flood zones 2 and 3. While it is noted that the proposed policy requires that development will not exacerbate flooding elsewhere (potentially at Five Oak Green, Whetsted, Paddock Wood and further afield) and should deliver flood storage/attenuation/mitigation measures, it must be questionable whether development in an area at risk of flooding, and which could exacerbate flooding further afield, should be permitted in this location, especially in the light of impending climate change. Moreover, the policy does not require building standards and designs that will make the new dwellings and other development resilient to any flooding that may occur despite the flood storage/attenuation/mitigation measures.

Light Pollution

CPRE Kent is concerned that development of the site will increase and intensify the extent of light intrusion in this and the surrounding areas.

NPPF 180(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes. The CPRE Dark Skies map <https://www.nightblight.cpre.org.uk/maps/> shows that Paddock Wood is in the darker skies category (one up from brighter) and the AONB to the south and the river

plain north to Hadlow are both in the next to darkest category. The scale of the development will introduce light pollution into the area of dark skies contrary to the NPPF.

It is also not clear whether street lighting will be required on the proposed A228 improvements around Colts Hill and/or the new Five Oak Green bypass, while inter-settlement cycle routes which use rural lanes or PROWs will require some form of lighting if they are to be more than day-time route options.

Conclusion

The plan is therefore considered to be unsound because it is not consistent with national policy.

CPRE Kent would wish to participate at the examination hearings to explore this issue further.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

CPRE Kent would wish to participate at the examination hearings to explore this issue further.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Matthew Crane ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Matthew Crane ([REDACTED])
Comment ID	PSLP_1364
Response Date	04/06/21 16:45
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Matthew Crane
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Policy STR/SS 3 Strategy for Tudeley village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am local resident living in Golden Green for the last 3 years. I grew up in Tunbridge Wells where my parents have lived for the last 32 years so I understand the local community. My wife and I moved to Golden Green from London to get back to living in the countryside as it is a fantastic place to bring up 3 young boys who want nothing more than wide open spaces and to really immerse themselves in the nature and local countryside.

I have a number of key concerns with the current plans -

- There is absolutely no consideration in the plans of adequate infrastructure with regards to traffic. With all my children attending local schools - Summerhill and Bishop Chavasse we are already confronted with significant traffic issues in getting them to school. With the proposal to close Hartlake Road this is only going to get worse and makes absolutely no sense.

- The traffic going through Tonbridge is already an issue. This can easily be seen on any weekday on Tonbridge high street and at the weekend. As a daily commuter to Tonbridge station the current infrastructure in the surrounding area is already insufficient. The current plans whilst drawn up by Tunbridge Wells borough council will ultimately end up with the large proportion of these residents using Tonbridge facilities. To say that this is not the case is clearly not linked to what all current residents say. The plans do not go far enough in tackling these issues.

- I am very concerned with the plans of building on the floodplains. With a house that already lives in proximity to the Medway and to see the annual impact of the flooding on the surrounding area I genuinely don't believe the current plans have actually thought through the issue of flood risk. The plans are putting the local community into danger and therefore I cannot see how they can be considered as safe.

- Whilst I accept that more housing is required in the local area and know one day my own children will need access to affordable housing, TWBC don't appear to have looked at other brownfield sites that could provide the same solution. TWBC has 20 Wards but TWBC want to put more than 50% of all of their new housing in just one ward - Capel. This will inhibit development elsewhere and creates a disproportionate burden on this local community.

- As we drive down Hartlake road every morning my children comment on how stunning the countryside is and how much they love living in this area. This plan is going to destroy an area of outstanding rural beauty, will create the destruction of 600 acres of greenbelt, will force the local community into dealing with 15 years of heavy construction and create even more air pollution. Put simply this plan might be creating housing but it is destroying the environment and community for a whole generation.

If this plan is approved in its current form the government and the local council will be letting down the next generation and destroying an amazing local community. It is simply no fit for purpose.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I wish to participate as I am more than happy to provide a voice to the representation provided above.

Supporting Information File Ref No: SI_144

Comment

Agent	Mrs Jane Piper ([REDACTED])
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Company / Organisation	Barton Willmore
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Consultee	([REDACTED])
Company / Organisation	Crest Nicholson
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Crest Nicholson ([REDACTED])
Comment ID	PSLP_2071
Response Date	04/06/21 15:53
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[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-10 Appendix 3 Fig. 5 Visual Appraisal Plan](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-13 Appendix 3 Site Context Photos](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-1 Representation & Appendix 1 Site Plan](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-2 Appendix 2 Flood Risk & Drainage Overview](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-12 Appendix 3 Site Appraisal Photos](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-4 Appendix 3A.1](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-11 Appendix 3 Fig. 6 Opportunities & Constraints Plan](#)
[PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-8 Appendix 3 Fig. 3 Landscape Character Plan](#)

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HB

Question 1

Respondent's Name and/or Organisation

Crest Nicholson

Question 2

Agent's Name and Organisation (if applicable)

Barton Willmore

Question 3

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: For further comments by Crest Nicholson, please see Comment Numbers PSLP_2064, PSLP_2066-2074, and PSLP_2077]

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

[TWBC: the following paragraphs are relevant extracts from the representation. For the full representation and appendices, please see supporting documents]

1.0 INTRODUCTION

1.1 These representations have been prepared on behalf of Crest Nicholson (Crest). Crest is promoting land at North West Paddock Wood. It will hereafter be referred to as “The Site” (see the Site Plan RG-M-09B at Appendix 1).

1.2 The land forms part of a much wider allocation (Policy STR/SS1), which provides for circa 3,490-3,590 new dwellings across Paddock Wood.

1.3 These representations primarily focus on the Allocation insofar as it relates to Paddock Wood as a whole, but more specifically land to the north and west of Paddock Wood and demonstrates that the allocation is largely “sound” and “deliverable”, when having regard to the National Planning Policy Framework (NPPF) and Planning Practice Guidance. However, we provide comments in seeking to ensure the policies are more fully “justified” and “effective” in NPPF terms.

1.4 In support of these representations a series of technical studies have been produced and whilst not included presently, they have informed the content and nature of Crest's representations. Our representations have therefore been prepared with the help and support of the following technical consultants:

- | | |
|------------------------|-------------------------------|
| . Flood Risk/Drainage | Ardent Consulting Engineers |
| . Highways | RPS (Transport & Engineering) |
| . Ecology/Biodiversity | Aspect Ecology |
| . Landscape | Barton Willmore/Landscape |
| . Masterplanning | Barton Willmore/Design |
| . EIA Review | Barton Willmore/EIA |

1.4 Alongside these representations, and in accordance with TWBC request on its submission forms, we have set out in a separate submission our response to the consultation on the Sustainability Appraisal which accompanied the Local Plan.

1.5 The representations are set out as follows:

- . Section 2.0 – National Policy
- . Section 3.0 – TWBC Local Plan/Vision & Objectives
- . Section 4.0 – Strategic Policies
- . Section 5.0 – Development Management Policies

2.0 NATIONAL POLICY

2.1 This section provides an overview of the NPPF with particular regard to plan-making. Other policies in the NPPF will also be referred to later in these representations.

i) National Planning Policy Framework

2.2 The revised National Planning Policy Framework (NPPF) was published in February 2019. The NPPF requires that Local Plans be considered against the “soundness tests” set out in Para 35, namely that they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.3 These representations will consider the Reg 19 pre-submission Local Plan against the tests of soundness set out above. The next section details the “Duty to Co-operate” in this regard.

ii) Planning Policy Guidance

2.4 We have also had regard to the various provisions of the Government’s Planning Practice Guidance (PPG), in particular “Guidance on plan-making” 1 and sections:

- . Maintaining Effective Cooperation [Para: 009 Ref ID: 61-009-20190315] onwards;
- . Evidence Base [Para: 034 Ref ID: 61-034-20190315] onwards.

1 <https://www.gov.uk/guidance/plan-making>

Policy STR/SS1: The Strategy for Paddock Wood, including land east of Capel

“Not justified or effective”

4.104 Whilst Crest supports the overall principles of this policy, it considers the Policy to be **unsound**, as the policy wording needs to be “justified” and more “effective”.

4.105 Crest commends TWBC for the amendments made to the Reg 18 version of the Plan to formulate this Reg 19 Plan, particularly in respect to the policies regarding development at Paddock Wood, as it significantly improves the ability to understand the Plan and policies. That said however, the Local Plan is still overly long, as are many of the policies, and could be further simplified and edited to make it easier to read, navigate and comprehend.

4.106 The Plan should be read as a whole; therefore, it should be as concise as possible with a minimal amount of repetition. This will also remove any discrepancies between slight deviations in wording of different policies.

4.107 Policy STR/SS1 is still unnecessarily long, overly complex, repetitive, and most importantly does not provide certainty as to which part of the allocated development will be contributing to what element of infrastructure.

4.108 We set out below representations on individual parts of the policy and supporting text, but we have suggested the **whole policy should be re-drafted** in the Suggested Modifications below to make the policy “sound”, “justified”, “effective” and make it clear which “parcel” (and therefore “developer”) is expected to be providing which elements of the infrastructure.

4.109 Paragraph 5.191 of the Local Plan presently states:

“The assignment of contributions will be further refined through the Supplementary Planning Documents to be prepared for each Strategic Site. The delivery of this infrastructure should be through ongoing discussions with relevant stakeholders.

4.110 In order to ensure delivery, ongoing discussions should also include developers; therefore, “*and the developers*” should be added to the end of paragraph 5.191.

4.111 To give developers certainty, greater clarification should be provided in the local plan to explain:

- . the type of infrastructure required
- . how it will be funded
- . which development pays for what
- . what the Council’s intentions are for CIL
- . if CIL is pursued, how it will work with S106 contributions; and

. how 'double-dipping' will be avoided.

4.112 Paragraph 5.193 states,

"It is important that the overall vision is clearly established to help develop the growth around Paddock Wood and east Capel strategically and holistically. To this end, the Council has facilitated the production of a Structure Plan for the whole settlement, which will be published as a Supplementary Planning Document (SPD). Beneath this, three Framework Masterplan SPDs, with input from land promoters, local communities, and infrastructure and key service providers, will be prepared. These SPDs will provide a framework to how the policy requirements of this Local Plan can be incorporated into the new settlement in order for it to attain the garden settlement objectives in relation to the development, and how these will relate to the neighbourhood development plans being produced by Paddock Wood Town Council and Capel Parish Council. The SPDs will need to be adopted before any planning permissions for substantial new development at that part of Paddock Wood and east Capel are granted unless exceptional circumstances arise. Planning applications will generally need to accord with the broad objectives and principles set out in the SPDs. The different parcels to which the SPDs relate is shown at Map 27."

4.113 Crest has several concerns about this paragraph. Crest acknowledges and accepts engagement as good planning practice and as a fundamental tenet of Garden Settlement principles. However, this element of good planning practice has to start early and be undertaken throughout the planning process, including plan-making. This way, successful new communities are planned and delivered.

4.114 Any policy addressing the issue of engagement should, therefore, also apply to the Council itself for consistency, transparency and to provide certainty and to ensure deliverability. For example, to date, the Council has not engaged fully in 'early and effective discussions' with the developers of the Paddock Wood strategic urban expansion in the preparation of the masterplan/framework document. Consultation is not the same as engagement. These documents should be **co-produced** with the developers, alongside engagement with the other relevant stakeholders. By doing this a more practical approach could be taken, whereby for example, landownership is taken into account to provide certainty and to ensure deliverability.

4.115 Moreover, Crest is concerned that waiting for the SPDs to be adopted may cause unnecessary delays in delivery, particularly given the suggested timetables in the LDS and the amount of work required to be undertaken concurrently. The LDS sets out the following amount of work and timelines:

Local Plan (from LDS, Feb 2021)

- . Submission to SoS; July 2021
- . Exam: Nov 2021
- . Insp's Report: April 2022
- . Adoption: June 2022

Paddock Wood Structure Plan SPD

- . Draft prepared Jan 2022 (may be adjusted following receipt of Insp's report in April 2022)
- . Consultation: June/July -August 2022
- . Adoption: October 2022

Paddock Wood Framework Masterplan(s) SPD(s)

- 1 Town Centre
- 2 North western parcel
- 3 Northern parcel
- 4 South eastern parcel

* These may be produced as a series of individual SPDs, two SPDS (one for the Town Centre and for the remaining parcels), or as a single SPD. This will be confirmed in due course.

- . Engagement with public and stakeholders: 2021 (including at times engagement undertaken by developers, or undertaken by developers and the Council simultaneously)
- . Draft prepared : January 2022, with time to be adjusted if necessary following receipt of the Inspector's report on Local Plan (April 2022)
- . Consultation: June/July – August 2022
- . Adoption: October 2022

4.116 How will the Council resource the preparation for and the Local Plan Examination itself whilst also producing these documents? How will this fit in and be co-ordinated with the Neighbourhood Plans? How will it all fit in with the other major SPDs planned for at the same time:

- . Tunbridge Wells Town Centre Area Plan
- . Tudeley Village Structure Plan
- . Local Cycling and Walking
- . Biodiversity Net Gain
- . Historic Environment

4.117 And how will this process ensure delivery and a five-year housing land supply?

4.118 For ease, we have set out Crest's representations to Policy STR/SS1 in the table below so that each representation can be seen in the context of the relevant part of the policy:

Policy STR/SS 1

Suggested Comment – in Brief

Significant growth around Paddock Wood and east Capel is proposed to deliver approximately 3,490-3,590 houses, as defined on the Policies Map.

The development strategy for Paddock Wood and east Capel is to:

1. With Policies STR/PW 1 (the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish), set provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period and beyond. This is facilitated through the release of Green Belt land;
2. Provide for the expansion of Paddock Wood and east Capel, which will deliver the following, on the broad locations as identified at Map 28:
 - a. approximately 3,490-3,590 dwellings;
 - b. three neighbourhood centres providing around 2,000sqm commercial floorspace (Class E) in total: one in each of the key development parcels as outlined on Map 27. The broad locations of the neighbourhood centres will be defined through the Framework Masterplans, and should be located to maximise accessibility by foot from the new dwellings to serve local shopping needs;
 - c. two two-form entry primary schools: one in the western parcel (edged in blue on Map 27) to the north of the railway line, and the second in the eastern parcel (edged in yellow on Map 27). The primary school site in the western parcel should be safeguarded to enable expansion to three form entry;
 - d. a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities. Around 10 hectares of land should be safeguarded within the western parcel (edged in blue on Map 27), to the south of the railway line and to the east of the A228 for this purpose;
 - e. provision of a health centre: there is potential for this to be co-located with the sports and leisure hub;
 - f. three-pitch gypsy/traveller site (to include one mobile home and one touring caravan per pitch). It is expected that this provision will be on the western parcel (to the north of the railway line) and eastern parcel (as shown on Map 27);

g. significant new land for a mix of employment uses on sites to the north and south of Lucks Lane, and to the east of Transfesa Road. These are Key Employment Areas and regard should be had to Policy ED 1. The new employment areas should include walkable links from the new neighbourhoods;

h. a town-wide system of paths and cycle routes, linking out of the town to nearby villages and leisure routes, such as the Hop Pickers Trail;

i. a new north-south pedestrian and cycle link over the railway line (within the western parcel), linking neighbourhoods and public facilities;

j. a Paddock Wood 'Wetland Park' to the north of the western parcel (land edged in blue on Map 27), to deliver flood water attenuation and new wetland habitat, and allowing for informal recreation via a network of footpaths and boardwalks;

k. a community hub;

3. Provide a mix of housing types, size, and tenure to be provided to ensure a balanced, inclusive, and accessible community, the exact mix to be agreed with the Local Planning Authority at the planning application stage. Forty percent affordable housing should be provided on-site and phased through the development in line with Policy H3;

4. Provision to be made for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of older people. At least one sheltered and one extra care housing scheme shall be provided within the strategic site;

5. Be developed to a high standard of design and layout. Particular attention to be paid to layout, scale, height, design, and massing to ensure that the development is of a high quality design responding to local character.

Planning applications for development should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application;

6. Ensure the development embeds the garden settlement principles. Planning applications need to demonstrate consideration of the associated key qualities as outlined in the supporting text;

7. Secure the phased delivery of highway and transport infrastructure, including on and off-line improvements to the A228 around Colts Hill and the provision of a new highway which bypasses Five Oak Green, as shown on Maps 29 and 33;

8. Provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre and the employment areas to the north of the railway line. The use of bus gates should be considered;

9. Provide walking and cycling linkages within the site, together with links to Paddock Wood town centre, employment areas, and surrounding countryside. Development in the eastern parcel, shown as land edged in yellow on Map 27, should make use of, and enhance, the Hop Pickers Trail;

10. For development on land to the west, edged in blue on Map 27, to provide compensatory improvements to the Green Belt;

11. Consider the potential for mineral deposits on the land edged in blue and yellow on Map 27, and any viably workable minerals should be extracted prior to development commencing on the site;

12. Incorporate zero and low carbon energy production, in line with the requirements of Policy EN 3, during early design stages to provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles fundamental to the design, construction, and operation stages;

13. 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 substantial development on the site, unless exceptional circumstances arise. 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;

14. Provide a scheme for the management and funding for green spaces and green infrastructure for each parcel of land as outlined on Map 27, for both amenity and biodiversity for the lifetime of the development;

15. Secure developer contributions towards the strategic growth of this area and Tudeley Village, either in kind (normally land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study (February 2021) (or a version of this document as amended), to include:

a. highway improvements and mitigation measures, including:

i. on and off-line works to the A228;

ii. new bypass around Five Oak Green;

b. provision, improvements, and enhancement to bus and cycle routes, and cycle corridors;

c. primary and secondary education provision;

d. health and medical provision; utility provision and upgrades;

e. flood defences and mitigation measures;

f. improvements and enhancement to sports and recreation provision, including children's and youth play space;

g. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.

The development will be delivered through the production of four Framework Masterplan Supplementary Planning Documents (SPD). This will relate to an overall Structure Plan for the planned growth, and three further SPDs in relation to the following parcels of land, as shown on Map 27:

1. Western parcel (edged in blue);

2. Northern parcel (edged in red);

3. Eastern parcel (edged in yellow).

These Framework Masterplans will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood and east Capel. The SPDs will set out guidance to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site. It will provide guidance on design, phasing, and site access to ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood.

Proposals for the piecemeal development of individual sites within the parcels identified will not be supported (it is noted, and accepted, that the western parcel is likely to be delivered as two schemes). 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 & Malling and Maidstone Borough Councils) and other statutory consultees.

It is highly likely the delivery of the development will require land equalisation agreements. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach.

The policy also allocates “*significant new land for mix use employment*”. Given the significance of this allocation to the Council's development strategy, Policy STR/SS1 should set out the quantum of employment to be delivered from the 14 hectares identified in Policy STR1. This will then enable appropriate calculations to be applied for infrastructure requirements etc.

For consistency in terminology this should say Limits to Built Development will be set through the Structure Plan (not development strategy)

2b. Policy needs to be more future-focussed, flexible and resilient so as to reflect the way people will use neighbourhood centres in the future, and not based on a specific quantum. Centres should be planned around people interacting. Centres should be focussed on the co-location of uses such as education, leisure, and recreation (formal and informal), employment, cultural, health, community, retail, social (informal and formal) open spaces and transport interchanges. They should not be fixed by boundaries so that they become stagnant or even obsolete, but fluid and flexible to allow for a variety of uses and the centre for events, “pop-ups” or meanwhile uses.

2c. This should also be subject to evidence from the Education Authority at the appropriate time.

2d. It should be recognised that the financial contributions for the proposed population will not yield the need for a swimming pool in and of itself; hence additional funding mechanisms will need to be investigated.

Paragraph 4.13 of Indoor/Built Sports Facility Needs Assessment (June 2018) states 10.62sqm of swimming pool per 1,000 people. 3490-3590 dwellings x 2.37 persons per h/h = 8271-8508 people/1000 X 10.62sqm = 87.84 - 90.35sqm of swimming pool. 187sqm is equivalent to 25m x 4 lane pool; therefore, total PW development would only (at most) provide for circa half a pool.

2e. or co-located with neighbourhood centre, as it may be easier to walk to/more central.

2f. We seriously question the present “need” for such provision, let alone as part of this proposed development.

We also strongly object to the suggested location for such provision, upon which Crest had received no prior liaison or consultation – it simply appearing in the Reg 19 LP.

2g. The policy should specify the quantum of employment land.

2h “...*where possible, practical and appropriate*” should be added to the end of this paragraph as it is unclear, at this stage, when the masterplan has not been considered in detail whether active travel routes/links to routes through existing areas of settlements is possible, practical, or appropriate.

2i – amend to “*subject to agreement with Network Rail, the Council will bring forward an improved pedestrian and cycle crossing over the railway line linking neighbourhoods and public facilities in this parcel.*”

2k. part of/collocated with Neighbourhood centre.

3 Add to end of para, “...subject to viability” or in accordance with Policy H3.

4 The general location should be determined through the Masterplan process and in liaison with the Parcel promoters.

7 The A228 improvements need to be evidenced. The Five Oak Green by-pass only relates to Tudeley. See reps to Policy STR6 in regard to both, and para 5.190 of the Local Plan on the latter.

9. "...*where possible, practical, and appropriate*" should be added to the end of this paragraph as it is unclear, at this stage, when the masterplan has not been considered in detail whether active travel routes/links to routes through existing areas of settlements is possible, practical, or appropriate.

10. This should be deleted as other requirements of the policy, for example to provide access and outdoor sport and recreation; to retain and enhance landscapes, visual amenity, and biodiversity provide Green Belt compensation as defined in the PPG on Green Belt (002 Reference ID: 64-002-20190722)

11. For clarity add "...through a Minerals Assessment Report".

12. Delete text after EN3, as superfluous

15. To date there has been no engagement or joint working with the developers of the Paddock Wood strategic urban expansion in the preparation of the masterplan/framework document. This document should be co-produced with the developers to provide certainty and to ensure deliverability, as well as engagement with the other relevant stakeholders.

Delete “and Tudeley Village” from 1st sentence of Para 15 as Policy STR/SS1 does not relate to Tudeley Village and it would fail CIL Regs 122 tests of being:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

Relationship with CIL needs to be set out in the Local Plan to reflect the Council's position as set out in the LDS (February 2021) and to make it clear what developers will be expected to pay to give certainty and to set out how the Council will avoid 'double-dipping'. Strategic sites should be zero-rated.

In order to provide certainty to the developers, the Local Plan and SPD needs to ensure clarity about who is delivering what, otherwise there may be significant disagreement and conflict in the future resulting in delays to delivery.

The Local Plan policy should recognise and allow for the allocation to be brought forward by different developers and in different phases and applications to deliver the housing required in a timely way within the Local Plan.

This is welcomed but must be co-produced with the developers.

This should be deleted and moved to supporting text as not “policy” and therefore superfluous.

This paragraph should be deleted and replaced with text that recognises and allows for the allocation to be brought forward by different developers and in different phases and applications. The production of the Structure Plan and SPD should provide both the Council and the developers certainty.

In turn, the Structure Plan should set the broad land uses provided in each location and an associated infrastructure delivery plan will set out what will be delivered and by whom in accordance with that masterplan (i.e.. the “shopping list”)

The issue of land equalisation is not a planning policy matter and should be deleted.

A more effective delivery method would be consistent and transparent liaison with each of the promoters.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question

5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested Modifications

4.119 In order to ensure delivery, ongoing discussions should also include developers; therefore, ***“and the developers”*** should be added to the end of paragraph 5.191.

4.120 **Additions to supporting text** (text moved from policy to better explain how STR/SS1 fits in overall):

“Strategy for Paddock Wood and east Capel is set out in the following policies:

STR/SS1

STR/PW1(the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish)

“The expansion to Paddock Wood town in STR/SS1 will be comprehensively planned through a co-produced Masterplan for the whole development along with three Development Framework Supplementary Planning Documents (SPDs) for each of the three locations, as defined on Map 27:

- 1 Western parcel (edged in blue);*
- 2 Northern parcel (edged in red);*
- 3 Eastern parcel (edged in yellow)*

“The Masterplan and Development Framework SPDs will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood town. The Development Framework SPDs will set out guidance to show how the policy requirements, together with other policies within this Local Plan, should be delivered on the site. It will provide guidance on design, phasing, and site access to ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood.”

4.121 The term ‘Structure Plan’ has a distinct meaning in planning parlance, and in this context could be confusing. The suggested revised policy below, changes the phrases ‘Structure Plan’ to ‘Masterplan’, and ‘Framework Masterplans’ to ‘Development Framework’ documents/SPD to reflect more common planning phraseology for these stages of work.

4.122 Revised Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

The development strategy for Paddock Wood and east Capel is to provide for the expansion of Paddock Wood town (including some land within east Capel parish) to deliver approximately 3,490-3,590 houses and XX hectares of employment in the broad locations shown on Map 28 and on the Policies Map.

The expansion will be comprehensively planned through a co-produced Masterplan for the whole development along with three Development Framework Supplementary Planning Documents for each of the following locations, as defined on Map 27:

- 1 Western parcel (edged in blue);
- 2 Northern parcel (edged in red);
- 3 Eastern parcel (edged in yellow).

It is acknowledged that there are several developers that have land interests within this allocation and the Council is cognisant of ensuring delivery is not hindered unduly. As such, it will consider positively individual applications that are in line with this policy and in general conformity with the Masterplan and Development Framework documents.

The delivery of this development should be through ongoing discussions with relevant stakeholders. This includes, but is not limited to, Kent County Council, adjacent local planning authorities (Tonbridge & Malling and Maidstone Borough Councils) and other statutory consultees.

This development allocation is important to the Council’s spatial development strategy for this local plan period. If necessary, the Council will use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach.

A. Development Principles

- 1 With Policies STR/PW 1 (the strategy for Paddock Wood parish) and STR/CA 1 (the strategy for Capel parish), the Masterplan will set the Limits to Built Development as a framework for the

provision of an extended settlement over the plan period. This is facilitated through the release of Green Belt land to the north west.

2 The new development will:

- i. Reflect and embed the garden settlement principles, as set out in the supporting text;
- ii. Be developed to a high standard of design and layout. Particular attention to be paid to layout, scale, height, design, and massing to ensure that the development is of a high quality design responding to local character. Planning applications for development should be assessed by a Design Review Panel, at least once at pre application stage and once following submission of a planning application;
- iii. Provide a mix of housing types, size, and tenure to ensure a balanced, inclusive, and accessible community, the exact mix to be agreed with the Local Planning Authority at the planning application stage. 40% affordable housing should be provided on-site, subject to viability, and phased through the development in line with Policy H3;
- iv. Provide housing for those with different accommodation needs, including those of older people. At least one sheltered and one extra care housing scheme shall be provided within the allocation. The general location will be determined through the Masterplan;
- v. Provide a town-wide system of paths and cycle routes, linking out of the town to nearby villages and leisure routes, such as the Hop Pickers Trail, where possible, practical, and appropriate;
- vi. Incorporate zero and low carbon energy production, in line with the requirements of Policy EN 3;
- vii. 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 substantial development on the site, unless exceptional circumstances arise. 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;
- viii. Provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre and the employment areas to the north of the railway line. The use of bus gates should be considered;
- ix. Where appropriate, consider any potential on-site mineral resources through the submission of a Minerals Resource Assessment to the Minerals Planning Authority.

B. Financial Contributions

1. Subject to viability, contributions (in kind and/or financial) will be sought from all development parcels within this policy, that are fairly and reasonably related in scale and kind, to secure the phased delivery of highway and transport infrastructure, as set out in the Strategic Sites Masterplanning and Infrastructure Study (February 2021) (or a version of this document as amended), including:
 - a. highway improvements and mitigation measures
 - b. provision, improvements, and enhancement to bus and cycle routes, and cycle corridors;
 - c. primary and secondary education provision;
 - d. health and medical provision;
 - e. utility provision and upgrades;
 - f. flood defences and mitigation measures;
 - g. improvements and enhancement to sports and recreation provision, including children's and youth play space;
 - h. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.
2. Developers will also be required to provide a scheme for the management and funding for green spaces and green infrastructure for each parcel of land for both amenity and biodiversity for the lifetime of the development.

C. The Western Parcel

- 1 In addition to the above, the Western Parcel (edged blue on Map 27) should provide:
- i. A neighbourhood centre of an appropriate scale for the new community that does not compete with the town centre to include Class E uses (retail, commercial, business and services)¹;
 - ii. a community hub to serve the new community ¹;
 - iii. A site for a health centre to serve the new community ¹;
 - iv. A site for a two-form entry primary school to the north of the railway line, with additional land safeguarded to enable expansion to three form entry, if proven necessary¹;
 - v. A site of around 10 hectares to the south of the railway line and to the east of the A228 for a new sports and leisure hub;
 - vi. a Paddock Wood 'Wetland Park' to the north, to deliver flood water attenuation and new wetland habitat, and allowing for informal recreation via a network of footpaths and boardwalks;
 - vii. subject to agreement with Network Rail, the Council will bring forward an improved pedestrian and cycle crossing over the railway line linking neighbourhoods and public facilities in this parcel.

D. The Eastern Parcel

Crest defers to the LPA and the Parcel promoter(s) – as to any revised wording for this Parcel.

E. The Northern Parcel

- 1 In addition to 1. above, the Northern Parcel (edged red on Map 27) will provide:
- i. XX hectares of new land for a mix of employment uses on sites to the north and south of Lucks Lane, and to the east of Transfesa Road. These are Key Employment Areas and regard should be had to Policy ED1;
 - ii. The new employment areas should include walkable links from the new neighbourhoods.

Notes:

- 1 Where possible, these uses should be co-located to maximise community interaction and be easily accessible by walking, cycling or public transport to reflect the garden settlement principles.
- NB: In making the above suggestions for the “Western Parcel”, we are mindful that this “parcel” includes land promoted by both Crest Nicholson and Dandara. The above suggestions are the suggested rewording of Crest Nicholson alone, and Dandara will be making its own representations.**

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Crest is promoting land at North West Paddock Wood, part of the strategic development site STR/SS1 and a significant part of the Council's housing delivery. As such, it is important that Crest is represented in all the relevant EiP hearing sessions.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Review of the Sustainability Appraisal supporting the Tunbridge Wells Borough Pre-Submission Local Plan

1.0 Introduction

1.1 This report presents a review of the Sustainability Appraisal (SA) process supporting the Tunbridge Wells Borough Council (TWBC) Pre-Submission Local Plan, which is at Regulation 19 stage¹. The Local Plan sets out the proposed planning policies and will guide development in TWBC up to 2038. The review has focused on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the TWBC Pre-Submission Local Plan (herein referred to as the 2021 Reg 19 SA Report), prepared in February 2021². Whilst the review has focused on the latest SA material, reference has been made to earlier reports including the 2016 SA Scoping Report³, the 2019 SA Issues and Options Report⁴ and the 2019 Regulation 18 SA Report⁵, where necessary to give a view on the adequacy of the whole iterative SA process. The 2021 Reg 19 SA Report is the final report of the SA process that supports the Regulation 19 Pre-Submission Local Plan and is a critical part of the evidence base for the Examination.

1.2 Barton Willmore undertook a review of the SA Report that supported the Regulation 18 consultation Draft Local Plan⁶ in November 2019 and submitted comments to TWBC during this consultation. No major deficiencies were identified but recommendations were made for areas that would benefit from improvement to support the Local Plan and increase the chance of it being found sound at Examination. Our response in terms of whether we agree that these comments have been addressed and incorporated into the 2021 Reg 19 SA Report, or whether further clarification is required, is outlined in the later sections of this report. The full SA review is included at Appendix 1 and focuses on the areas that were identified as needing more explanation and detail at the Regulation 18 stage. It uses a 'traffic light' scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). No areas of major deficiency were identified in the SA (red).

1.3 In addition, this report includes an appraisal of 'Land West of Paddock Wood'. Land West of Paddock Wood is appraised within the 2021 Reg 19 SA Report as part of allocation STR/SS 1. The site-specific appraisal is included in Section 3 and has been undertaken by Barton Willmore utilising the same matrix methodology and nineteen SA Objectives used to consider the alternative site options within the SA process for inclusion within the Local Plan. The matrix assessment with a colour coded key is a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. The appraisal provides commentary on the score that we consider should be awarded for each objective indicator question.

2.0 Review of SA

Purpose of Review

2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan.

2.2 A Local Plan must be prepared in accordance with Section 39 of the Act "with the objective of contributing to the achievement of sustainable development". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.

2.3 Barton Willmore undertook a review of the SA at the Regulation 18 consultation stage in November 2019. The full review of the SA process which includes the 2021 Reg 19 SA Report is presented at Appendix 1. This review has sought to focus on the areas we felt needed more explanation and detail at the Regulation 18 stage and identify whether these comments have been addressed in the 2021 Reg 19 SA Report and if there are any areas of the SA that would benefit from further focus or clarity in order to ensure that the Plan is determined as sound at Examination. As above, whilst the review has focused on the 2021 Reg 19 SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.

Review Summary

2.2 No areas of major deficiency were identified in the SA.

2.3 Table 1 below presents the comments that were made by Barton Willmore on the SA during the Regulation 18 consultation and discusses whether we agree that our comments have been addressed or not within the 2021 Reg 19 SA Report. This is reflected by the compliance review at Appendix 1. Table 1. Comments during Regulation 18 and Incorporation into the 2021 Reg 19 SA Report

[TWBC: for table, please see 'Review of Sustainability Appraisal', attached as a supporting document]

Areas of the Regulation 18 SA Identified as Requiring Additional Consideration

Existing environment (Habitats Regulations Assessment (HRA)) – the SA could better outline the conclusions of the Habitats Regulations Assessment (HRA) work undertaken for site alternatives and define how these have been assessed in combination with other sites or environmental effects. As the HRA had not been carried out in detail at the issues and options stage, the SA states that the precautionary principle was used when assigning scores to the biodiversity objective. However, there is no explanation of the use of the precautionary principle in the 2019 SA Issues and Options Report. There is also no reference provided for the 'Appropriate Assessment' mentioned in the SA. Given the need for assessments to be coordinated, it would be more transparent to include more information within the SA Report on the HRA undertaken for the Local Plan.

Environmental protection objectives -the SA framework does not refer to limits or standards including e.g. National Air Quality Objectives, Water Framework Directive, Condition of SSSIs, Carbon Emissions Targets. Inclusion of these objectives would make the framework more aligned with relevant local issues.

Likely significant effects on the environment (cumulative effects) - the approach to the assessment of cumulative effects is well outlined within the SA, however the short, medium and long-term effects, permanent and temporary effects are considered 'where possible' when determining the scores given in the impact matrix and these factors could be outlined better. In addition, cumulative effects are not well assessed at the issues and options stage and it is not clear how the 'Potential cumulative effects that must be considered by the Sustainability Appraisal' in Table 5 of the 2016 SA Scoping Report are brought forward and how they are relevant to the assessment of cumulative effects in the subsequent SA documentation.

Reasonable Alternatives - The narrative about the alternative sites seems reasonable although Appendices E-T and the summary within the main 2019 SA Report would benefit from an explanation of how mitigation and design has been taken into account to ensure a level playing field.

Incorporation into the 2021 Reg 19 SA Report

Section 3 of the 2021 Reg 19 SA Report outlines the conclusions of the HRA and that the Local Plan will not have a significant adverse effect upon the Ashdown Forest (both a Special Area of Conservation (SAC) and Special Protection Area (SPA)) (either alone or in combination with other plans) and states that the findings of the HRA have been considered in the preparation of the SA.

There is no method or weighting outlined with respect to the HRA when assigning scores to the biodiversity objective for the site alternatives. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. However, it is clear that the HRA and SA are better linked at the Regulation 19 Stage and that the findings have been used to influence scoring for biodiversity objective. Section 4 of the 2021 Reg 19 SA Report provides an overview of the international, national, regional and local environmental protection guidance and legislation for each environmental topic relevant to the preparation of the Local Plan and to the SA, as updated since the 2016 SA Scoping Report as necessary. Appendix A sets out an analysis of the baseline indicators which includes limits or standards and the implications for the new Local Plan.

Appendix D of the 2021 Reg 19 SA Report presents the Cumulative Impact Assessment Methodology which explains that within each table showing the SA scores for the allocated sites in each parish, a row has been included showing the likely cumulative effect of the individual sites against each SA Objective. The section explains how the cumulative score has been determined for each. The findings of this process were then used to perform an overall SA assessment for the borough i.e. a cumulative assessment of the SAs for all parishes and settlements. It would be helpful if the SA included a definition of secondary, cumulative, synergistic (particularly the difference between cumulative and synergistic), short, medium and long-term permanent and temporary effects, as these are not well defined.

It is less clear how cumulative impacts have been assessed in terms of the strategic policies and the development management policies. It would be helpful if the 2021 Reg 19 SA Report clarified this.

The assessment could be made stronger by considering how each of the policies and the SA Objectives might interact with one another. The cumulative effects that arise when the total significant effects of the Local Plan are assessed alongside known existing underlying trends and other plan and programmes could also be better outlined, as well as any measures included within the Local Plan to reduce these effects.

Appendix C of the 2021 Reg 19 SA Report better outlines the approach to mitigation that has been used.

The approach to the identification of reasonable alternatives (including the site selection process) is

better outlined within the 2021 Reg 19 SA Report and demonstrates that a full range of options have been included, with references given to the evidence base supporting alternatives.

A table outlining the reasons for site selection and rejection throughout the Local Plan / SA process, perhaps in an appendix, would be helpful and would increase the transparency of the site selection process. The SA should outline any initial high-level appraisal that may have been undertaken of the sites, for example at the initial first stage assessment based on designations and/or subjective assessment and explain whether the considered list of alternatives was initially reviewed by the SA team to ensure that the relevant high level, key factors from the SA were being considered. If any site visits and desk-based research were undertaken using existing information this should also be outlined. It would be helpful to outline whether any sites submitted to the Council were excluded and not taken forward and the reasoning behind this, including whether this was for sustainability reasons or not. Section 10 in the 2019 SA Report concludes with a complete SA combining of all elements of the Draft Local Plan. It would be helpful if the 2021 Reg 19 SA Report provided something similar for the Pre-Submission Local Plan. A thorough conclusion section would also provide more easily identifiable conclusions, identifying the preferred alternatives/sites and the reasons they are preferred over other alternatives, including how environmental/sustainability considerations informed this selection.

[TWBC: the above text is from Table 1. Comments during Regulation 18 and Incorporation into the 2021 Reg 19 SA Report]

2.4 The review has shown that improvements have been made to the SA report since the Reg 18 version. There are still, some areas that would benefit from additional consideration and/or explanation, however the SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the Local Plan as a reasonable strategy.

2.5 Appendix A of the 2019 SA Report includes some limitations of predicting effects, however these could be better considered and outlined in the main report, including for example assumptions made about secondary data and the accuracy of publicly available information. This still stands at the 2021 Reg 19 SA Report stage, however, Section 8.1.5 of the 2021 Reg 19 SA Report outlines the assumptions used in carrying out the sustainability assessment of reasonable alternatives, which is helpful.

3.0 Site Appraisal

Performance of Land West of Paddock Wood

3.1 A review has been undertaken of the Paddock Wood proposed allocation, in particular the relative scoring of the STR/SS 1 (PW extension) which is presented in Table 52: 'SA scores for allocated sites in Paddock Wood Parish' in the Regulation 19 SA.

3.2 Table 2 considers the fairness of the appraisal of the allocation at Paddock Wood and suggests the score that each option should be given for each objective, based on the colour coded matrix methodology used in the 2021 Reg 19 SA Report. Land West of Paddock Wood performed well overall against the nineteen SA Objectives in the site appraisal (Table 2 below). The site was awarded a positive (+ or ++) score in 13 out of the 19 SA Objectives and neutral (0) score was awarded for 5 of the SA Objectives, for which no impacts or negligible impacts are anticipated. One negative (-) score was awarded.

[TWBC: for table, please see 'Review of Sustainability Appraisal', attached as a supporting document]

3.3 Paddock Wood is served well by public transport links, including a dedicated train station and numerous bus services. There are many easily accessible amenities such as healthcare, schools, shops, leisure and sports facilities, green spaces and employment opportunities. The proximity of the sites to local facilities would lead to lower car trips, lower emissions and better air quality, as well as providing benefits for the health and wellbeing of the community and climate change.

3.4 We consider that Paddock Wood is a sustainable location for selection out of the presented site options, particularly considering that the SA Objective criteria for air quality relates to reducing pollution, due to the site's location in proximity to Paddock Wood train station, local employment, schools and facilities. Some other options are located a significant distance from sustainable public transport options meaning that developments in these locations would likely rely heavily on car use and would not provide a betterment for air quality. Paddock Wood would provide the best option when considered against the sustainability objectives, due to its location and positive impacts on air quality, climate change, facilities, health and biodiversity.

Summary of Site Appraisal

3.5 The site appraisal is based on our knowledge of the site's opportunities and the Promoter's commitment to delivery. This review concludes that the site should be allocated within the Local Plan based upon its performance against the SA Objectives.

4.0 Conclusion

4.1 The conclusion reached within this report, based on the SA review in Appendix 1, is that whilst the

SA process so far does not have major deficiencies, there are a number of areas that would benefit from further focus before Examination so that the process is as robust as possible.

4.2 The proposed draft allocation at Paddock Wood has been included for allocation within the Local Plan based on its sustainability merits. We consider that STR/SS 1 (PW extension) is a sustainable option for allocation and could arguably score more positively against the sustainability framework objectives than suggested in the 2021 Reg 19 SA Report.

[TWBC: for appendices, please see 'Review of Sustainability Appraisal', attached as a supporting document]

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

<input type="checkbox"/>	Yes, I wish to be notified of future stages of the Local Plan
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Supporting Information File Ref No: SI_91a-d

Comment

Agent	Andy Pearce [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CBRE Limited
Address	[REDACTED] [REDACTED] London [REDACTED]
Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Dandara Ltd
Address	[REDACTED] [REDACTED] Hemel Hempstead [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dandara Ltd [REDACTED]
Comment ID	PSLP_1689
Response Date	04/06/21 16:55
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_1685-1711 (not inclusive) CBRE(Dandara) LandscapeConcept SI.pdf PSLP_1685-1711(not inclusive) CBRE(Dandara) Letter SI .pdf PSLP_1685-1711(not inclusive) CBRE(Dandara) S'borough Concept SI.pdf PSLP_1685-1711(not inclusive) CBRE(Dandara) Representation SI .pdf
Data inputter to enter their initials here	AT
Question 1	

Respondent's Name and/or Organisation Dandara

Question 2

Agent's Name and Organisation (if applicable) CBRE Ltd

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Paragraph Numbers: 5.153 - 5.193

[TWBC: Covering letter, Full Written Representation, Landscape Concept and Southborough Vision Document attached as Supporting Information. This representation has been input against Section 3 - Vision & Objectives, Section 4 - The Development Strategy, Policies STR/SS 1, STR/HA 1, AL/RTW 5 and STR/CRS 1 – see Comment Numbers PSLP_1685, PSLP_1688, PSLP_1689, PSLP_1697, PSLP_1703 and PSLP_1711]

Question 4

Do you consider that the Local Plan:

Is legally compliant Yes

Is sound No

Complies with the Duty to Cooperate Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not effective
. It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

[TWBC: Covering letter/email as follows - copy also attached as Supporting Information]

CBRE is appointed by Dandara Ltd. to submit representations relating to the Regulation 19 Pre-Submission Draft version of the Tunbridge Wells Borough Local Plan.

Dandara hold specific land interests in respect of the following sites as set out in our representations:

- . STR/PW1 / STR/SS1 – Badsell Farm, Paddock Wood ('Paddock Wood');
- . STR/HA1 / AL/HA4 – Land off Copthall Avenue and Highgate Hill, Hawkhurst ('Hawkhurst');
- . STR/RTW1 / AL/RTW5 – Land at Speldhurst Road, Southborough ('Southborough');
- . AL/RTW 16 – Land to the west edge of Eridge Road at Spratsbrook Farm ('Spratsbrook Farm');
- and
- . Omission Site – Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road ('Sissinghurst');

The above sites are located within the administrative area of Tunbridge Wells Borough Council ('TWBC'). The Paddock Wood, Hawkhurst, Southborough and Spratsbrook Farm sites are all allocated in the Pre-Submission Draft Local Plan.

Separate written representations have been submitted by Barton Willmore LLP in respect to Dandara's land interests at AL/RTW 16 – Land to the west edge of Eridge Road at Spratsbrook Farm ('Spratsbrook Farm'). CBRE's written representations have been fully coordinated with Barton Willmore LLP's representations for Spratsbrook Farm.

Accordingly, please find the following enclosed representations which will be sent via email and secure electronic file transfer:

- . This cover letter;
- . Completed Local Plan Response Forms; and
- . Written Representations Report dated June 2021.

Dandara will continue to engage with TWBC as well as key stakeholders, to feed into and inform later stages of the plan-making process including the Examination hearings in due course.

Dandara will also continue to monitor the progress of the emerging Local Plan and will also look to make written representations on the next stage, Examination hearings in due course.

[TWBC: End of covering letter/email]

5.6 Pre-Submission Local Plan Policy STR/PW1 sets out the strategy for delivery of strategic housing allocations, Policy STR/SS 1: The Strategy for land at Paddock Wood, including land at east Capel and Policy STR/SS 2: Paddock Wood Town Centre. This includes the delivery of approximately 3,933 – 4,033 new dwellings at Paddock Wood comprising:

- Approximately 3,490 – 3,590 dwellings at Paddock Wood, including land at east Capel (Policy STR/SS1);
 - At least 30 dwellings as part of the revitalisation of Paddock Wood Town Centre and east Capel (Policy STR/SS2);
 - Approximately 413 dwellings at Land at Mascalls Farm (Policy AL/PW1);
- this includes 313 dwellings which already benefit from planning permission.

5.7 Dandara support the key overarching principles of Policy STR/PW1 including the requirement to contribute towards flood storage/attenuation/mitigation measures and flood defence works to reduce local flood risk and assess the impact of development on the setting of the High Weald Area of Outstanding Natural Beauty (AONB).

5.8 However, Dandara suggest that the word "approximately" 3,490 – 3,590 dwellings is replaced with "between 3,490 – 3,590 dwellings" as this is intended to be a quantum range and should be updated in the interests of ensuring "effective" policies in accordance with Paragraph 35(c) of the NPPF.

5.9 Appendix A provides a clear conceptual approach to how the requirements of Policy STR/PW1 can effectively be integrated to deliver upon the allocation. This work has been produced to evidence how our own technical assessment work broadly supports the proposed approach that is presented in the Structure Plan. The detail of how this will be progressed will clearly be part of further consideration with key local and statutory stakeholders as part of the SPD process, however, should provide the confidence of deliverability and that the draft policy provides an appropriate basis from which to progress the masterplanning of the site.

5.10 Policy STR/SS1 allocates a series of land parcels at Paddock Wood and east Capel, including PW1_1 for approximately 3,490 – 3,590 new dwellings and for it to adhere to Garden Village principles. Dandara support the key overarching principles of Policy STR/PW1 and site allocation STR/SS1 and the need for new housing and delivering mixed communities. Dandara support the Council's approach to produce four Framework Masterplan SPDs that are informed by the overarching Structure Plan.

5.11 Dandara specifically support the provision of new homes on the Western Parcel (see Figure 4 above) which includes Land at Badsell Farm (SHELAA Site ref. 142) for the delivery of new homes, a new neighbourhood centre and the Council's promoted new sports/leisure hub and health centre which part comprises adjacent land to the north (SHELAA Site ref. 309) within the site allocation. Figure 5 below identifies land parcel 142. We have further comments with regards to the approach to the new sports/leisure hub which are addressed in Paragraphs 5.56 – 5.71 below but have no issue with the principle of the land being used for this use, subject to the Council satisfying themselves that there proposals are acceptable with respect to landscape, highways, heritage considerations etc. It should be noted that whilst located in part on Dandara's land interest, the sports/leisure provision if not being promoted or delivered by Dandara. Dandara can confirm the land as available to be safeguarded for such future use.

5.12 Dandara is committed to working with the other strategic site landowners to prepare the masterplan for the Western parcel, which includes the entirety of their land interest at Badsell Farm, Paddock Wood. Dandara also wish to work collaboratively with the strategic site landowners developing masterplans for the other Northern and Eastern parcels and Paddock Wood Town Centre to ensure that strategic growth at Paddock Wood is of a high quality, delivers the requirements of Policy STR/SS1 and is fully coordinated.

Emerging Concept Masterplan and Landscape Framework – Dandara 5.13 The enclosed Land at Badsell Farm, Paddock Wood Landscape Concept Document (June 2021) prepared by Define with input from JTP has been prepared in support of the site's residential allocation and includes an initial assessment of site capacity and land budget factoring in the above identified site constraints.

5.14 The Landscape Concept Document includes a remodelled emerging concept masterplan and landscape framework for the Land at Badsell Farm site shown in Figure 6 below which is based on a remodelled floodplain using detailed flood modelling to maximise the site's development potential and make an efficient use of land while including necessary flood management and open space/sport provision in accordance with Paragraphs 96, 122 and 157 of the NPPF and crucially, to satisfy the requirements of draft Policy STR/SS1. Importantly the emerging concept masterplan has been underpinned by the site technical evidence base collated to date (flood modelling, baseline heritage advice, landscape visual impact analysis) to test the robustness of the masterplan and to ensure it responds to the site setting and its constraints.

5.15 Dandara's emerging concept masterplan therefore differs to the Council's Structure Plan (Map 28 of the Pre-Submission Local Plan) which is understood to be based on existing Flood Zones (EA Flood Map which sets out high level food zones and does not identify Flood Zones 3a/3b) and excludes any development in Flood zones 3a. Dandara's indicative site masterplan is benefited by, and based on, more-detailed flood modelling and realigned floodplain to maximise site development potential and making an efficient use of land while including appropriate flood management and mitigation as part of achieving necessary "betterment".

5.16 Dandara note that a similar and successful approach to remodelling the floodplain to achieve betterment and maximise the developable areas in the interests of efficient use of land in accordance with the NPPF was taken as part of the Phase 2 Northstowe redevelopment (3,500 new homes) in Cambridgeshire (South Cambridgeshire District Council) LPA ref. S/2011/14/OL, dated 9 January 2017, as amended) in accordance with the Northstowe Area Action Plan (adopted July 2007). It is noted that the EA / Council were fully supportive of approach to floodplain remodelling and this strategy was found to be sound.

5.17 The level of technical input that has informed the Structure Plan on Page 149 is appropriate in the context of informing a strategic policy and is consistent with Paragraph 156 of the NPPF as it relates to considering flood risk. To ensure that the Structure Plan on Page 149 does not intentionally pre-determine the production of the more detailed SPDs (and accompanying more detailed evidence) the status of the Structure Plan (and its strategic, conceptual nature) should be included in the policy to avoid it being seen as a 'fix' and provide transparency as to its intentions.

5.18 The technical work undertaken by Dandara in respect of detailed flood modelling confirms that there is more than one way to achieve the outcome of the established masterplan and good place-making principles under the Policy STR/SS1 and the Structure Plan and accordingly, there should be sufficient flexibility at this stage as long as principles align. Such flexibility will allow detailed discussions with the Council and key stakeholders through the masterplanning, SPD and future development management process.

5.19 Dandara propose that detailed flood modelling undertaken will be shared with the Council and the Environment Agency as part of future masterplanning and pre-application discussions to ensure the flood strategy and necessary mitigation to achieve betterment is agreed prior to future planning application submission. However, Policy STR/SS1 and the associated future Framework Masterplans (SPDs) should be flexible to allow for alternative approaches, whilst still achieving the objectives of the policy.

Quantum 5.20 Dandara accept that the quantum and scale of residential development for each strategic land parcel within site allocation STR/SS1 will be informed by a detailed masterplanning exercise factoring the individual site constraints and will draw down from the approximately 3,490 – 3,590 new dwellings. This figure is marginally below the quantum tested by the Council in their latest SHELAA (January 2021) which confirmed site allocation Policy STR/SS1 is suitable for delivering circa 3,600 homes. In this context, the reference to ‘approximately’ in the policy is not appropriate and instead should read “between 3,490 – 3,590 dwellings”. This would allow for the further detailed masterplanning work to appropriately test and refine the development capacities associated with individual sites within the artificial cap.

5.21 Dandara suggest additional flexibility is built into Policy STR/SS1 to account for the distribution and quantum of development and specific parcel layout to be determined by detailed masterplanning process and to form part of the Framework Masterplan SPDs to be adopted by TWBC to guide future development.

5.22 The enclosed Land at Badsell Farm, Paddock Wood Landscape Concept Document (June 2021) prepared by Define and JTP has been prepared in support of the site’s residential allocation and includes an initial assessment of site capacity and land budget based on remodelled floodplain layout and factoring all other constraints set out above.

5.23 This site capacity assessment confirms the site has an indicative potential capacity of between 500 – 600 dwellings based on a total 17 ha net deliverable residential area including roads and an average density of 35 - 38 dwellings per hectare. This housing range is indicative and is subject to detailed masterplanning and design feasibility work.

5.24 The delivery of circa 500 – 600 homes on Land at Badsell Farm represents between 14-17% of the total 3,490 – 3,590 dwellings to be delivered and therefore represents a significant proportion of homes and key site within the wider strategic allocation Policy STR/SS1.

Heritage 5.25 Supporting Paragraph 5.166 to Site allocation Policy STR/SS1 notes that whilst there are no listed buildings within the allocated sites, there are clusters of listed buildings adjacent to the site boundaries, including Badsell Manor Farm and the settings of the settings of these buildings form an important part of the heritage of the town.

5.26 Accordingly, Dandara have undertaken a Heritage Baseline study (Turley, August 2020) which concludes that appropriate mitigation and separation distances will ensure that any adverse impacts on the setting of the Mill House Group is avoided.

5.27 The heritage impact on the Badsell Manor Group is likely to be more sensitive due to its historic, functional and visual connection with the surrounding agricultural lands (including the site). However, confirms the following mitigation is proposed to the emerging landscape framework in response to the site’s heritage sensitivities:

- Retention of a planted buffer to the sides of Badsell Manor Farm;
- Enhancement of existing rows of trees along boundaries adjacent to Badsell Manor Farm and along the field to the north of Badsell Manor Farm;
- Retention of the existing field patterns within the site and/or reflection of these patterns within the development through landscaping and arrangement of landscaping, built form, transport routes, amenity, etc.

5.28 The Heritage Baseline study concludes that any perceived adverse impact on the significance of the listed buildings arising from development of the Site and the associated change in part of its landscape setting, would be towards the “lower end of the scale of less-than-substantial harm, identified by NPPF paragraph 196”. In that context, that less-than-substantial harm should be weighed against the significant public benefits of the proposed development, having regard to the considerable weight and importance to be placed on the desirability of preserving their special interest and setting (i.e. sustaining their heritage significance) in considering the overall acceptability of development on-site.

5.29 Therefore, the emerging concept masterplan for Land at Badsell Farm incorporates appropriate mitigation to demonstrate how the character, setting and significance of adjacent heritage assets associated with the Mill House and Badsell Manor identified groups of listed buildings can be preserved in accordance with paragraph 196 of the NPPF. Dandara note that sufficient flexibility should be included in the site allocation Policy STR/SS1 as to the specific design approach through the masterplanning process but provides confidence that heritage won't be a constraint to deliverability of the established principles.

Local Exceptional Circumstances5.30 Site allocation Policy STR/SS1 results in the strategic release of Green Belt land at Paddock Wood. This includes the release of the Western Parcel from the Green Belt.

5.31 As set out in the previous Chapter, there are clear Plan-Wide Exceptional Circumstances that support the release of Green Belt to deliver the objectives of the Plan.

5.32 The site is included in the Council's Green Belt Study Stage Three: Assessment of Green Belt Allocations (November 2020) prepared by LUC. Former Draft Allocations AL/CA3 and AL/PW1 (herein referred to as AL/PW1) includes an area of land of approximately 148 ha to the west and north-west and north of Paddock Wood that will be released from the Green Belt to deliver the vision for Paddock Wood. This is part of a larger allocation that also includes areas of non-Green Belt land to the north and east of Paddock Wood. This allocation includes two whole parcels - PW1_1 (southwest parcel) which comprises the entirety of Land at Badsell Farm, Dandara's land interest and PW1_2 (north-west parcel) - and small parts of PW1_3 (north central parcel) and PW1_4 (north-west central parcel) as shown in Figure 7 below.

5.33 The Green Belt Study Stage Three assessment confirms that overall, AL/PW1 makes a "strong" contribution to the prevention of encroachment on the countryside and a "relatively weak" contribution to prevent coalescence of neighbouring towns; and the impact of its release on the adjacent Green Belt is "moderate".

5.34 That said, Green Belt Study Stage Three assessment correctly references variations in harm for sub-Green Belt parcels. The western (blue) portion of Dandara's land interest (defined on its western edge by Tudeley Brook and on its eastern edge by the hedgerow lying between the inset edge and Tudeley Brook as show in Figure 7 above) makes a "relatively strong" contribution to Green Belt Purpose Test 3, but is considered to "contribute less to the impact on the perceived separation between Tudeley Village and Paddock Wood and will cause less impact on the distinction of adjacent Green Belt land to the south-west, west, north-west and north". Accordingly, the impact associated with the release of this area is "minor-moderate" and the harm rating is "moderate".

5.35 Dandara consider the Council's Green Belt Studies (Stages 1-3) to be detailed, robust and in accordance with Paragraph 35(d) of the NPPF. The Green Belt assessment appropriately captures the assessment of the site and, in turn, the policy appropriately responds (through the Structure Plan) to ensuring that residential development is contained to the east of the site with the western boundary kept more open through the indication of sports use on this part of the site.

5.36 The existing boundary between the Green Belt and Paddock Wood on the western approach into the town is abrupt, characterised by a dense housing area. The release of the site from the Green Belt offers the potential for a more logical boundary to be established to the Green Belt which is capable of enduring in the longer term using strong features (in the tree belt and road) which are physical and likely to be permanent.

5.37 The enclosed Landscape Concept Document (June 2021) (Appendix A) includes Define's independent study of the role of the Land at Badsell Farm site in delivering the purposes of the Green Belt. This study concurs with the findings of the Stage Three Green Belt Study. The existing belt of mature trees along the A228 provides a robust and easily identifiable new Green Belt boundary, and there is the potential to make this more robust, with the planting of additional vegetation as part of the masterplan.

5.38 All of the mitigation measures proposed by the Stage Three Green Belt Study are included within Dandara's emerging concept masterplan and landscape framework.

5.39 The Council's Development Strategy Topic Paper (February 2021) at Page 60 sets out the Local Exceptional Circumstances case for the release of Land at Paddock Wood (including land in east Capel). This is summarised as follows:1. the land proposed to be released from the Green Belt here is part of a wider release of non-Green Belt land to deliver development in a sustainable location,

around an existing settlement, with the potential to rejuvenate and revitalise the town centre: approximately 48% of the total area of land included for the comprehensive urban extension is currently designated as Green Belt; 2. through the comprehensive development of this site, and particularly the land to the west of Paddock Wood (i.e. that which would be released from the Green Belt), it has been identified through the Strategic Flood Risk Assessment that there is the potential for the flood mitigation required in association with this development to deliver “betterment” through reduced flood risk to existing areas of Paddock Wood and its surrounds. This requirement is specifically included in the policy, and is considered to make a significant contribution to the exceptional circumstances for the release of this land from the Green Belt;

5.40 We fully support the identification of the 3 points raised above. In developing point (1) further, in promoting the sustainable development on Paddock Wood it is clear that the benefits to sustainable development would be significantly less if further expansion of Paddock Wood was prioritised on ‘non-Green Belt’ land. Given the way that the Green Belt boundary is drawn to avoid Green Belt land would result in greater travel distances to the train station and key services in the High Street and would be inconsistent with Paragraph 138 of the NPPF.

5.41 Furthermore, in respect of (2) it is important to state that the betterment that would result is a product of the site being allocated for housing development which in effect acts as enabling works to the proposed remodelling. It would not be feasible for the remodelling work to be undertaken in isolation from the site being allocated for development.

5.42 As set out in Chapter 6 of the Landscape Concept Document (June 2021), Dandara’s emerging concept masterplan has been informed by the requirement for land to the south-west of Paddock Wood to provide flood mitigation which is central to the ‘exceptional circumstances’ as outlined above and in support of release of the land from the Green Belt. BWB have undertaken detailed flood modelling for the Site to understand the flood mitigation potential of Land at Badsell Farm to make the development more flood resistant and resilient to manage residual flood risk and achieve flood betterment for existing dwellings to the south-west side of Paddock Wood as required by draft Policy STR/SS1. BWB have identified the opportunity to remodel the floodplain and, in doing so, provide flood mitigation alongside additional developable area.

5.43 The emerging concept masterplan demonstrates that the remodelling of the floodplain and development parcels could in our view result in a better urban design response which can be tested through masterplanning and pre-application process, hence the need for the site allocation to provide sufficient flexibility.

5.44 Dandara therefore suggest the Council provide greater flexibility in Policy STR/SS1 and the emerging Structure Plan to reflect alternative options for the distribution of development and remodelling the floodplain in the interests of maximising the site’s development potential and ensuring an efficient use of land, while including necessary flood management and betterment to Paddock Wood required as part of the Local Exceptional Circumstances case in accordance with Paragraph 122 of the NPPF. The provision of a larger developable area would boost housing capacity on site and would help address the Council’s housing need and maximise sustainable development at allocated strategic sites in accordance with Paragraphs 73, 122 and 157 of the NPPF and crucially, to satisfy the requirements of draft Policy STR/SS1.

AONB Considerations 5.45 The Badsell Farm site and wider Paddock Wood masterplan (Policy STR/SS1) are not located within the High Weald AONB.

5.46 The key published document for understanding the relationship between the High Weald AONB and the site is the Council’s AONB Setting Analysis Report. This document recognises that development to the west of Paddock Wood (western parcels of draft allocation STR/SS1, including PW1_1) are “unlikely to have an adverse effects on the setting of the High Weald AONB”. However, to ensure a positive scheme is developed, a series of specific mitigation measures are proposed as summarised below:

- . Promote a landscape led approach to masterplanning that creates a structure to contain the allocation sites which is consistent with the character of the adjacent High Weald AONB.
- . Test the visibility of proposed development including preparation of LVIA with viewpoint analysis from the ‘Millennium Viewing Point’, a critical viewpoint location, using wireframes or photomontages in order to fully assess the potential effects on the setting to the AONB.
- . Any masterplan should adhere to relevant guidance including the National Design Guide (January 2021) and should take inspiration from the High Weald Design Guide and Management Plan.

- . Give careful consideration to the views and rural setting of listed buildings and historic farmstead, which are visible within the landscape from the High Weald AONB.

5.47 Dandara support the conclusions of AONB Setting Analysis Report and consider this to be a robust evidence base document.

5.48 The enclosed Landscape Concept Development Report (June 2021) includes an assessment of key viewpoints and assesses the response to the AONB.

5.49 Therefore, as set out in the enclosed Landscape Concept Development Report (June 2021), Dandara consider the emerging concept masterplan to positively include and respond to the Council's suggested AONB mitigation requirements and therefore is unlikely to have an adverse effect on the setting of the High Weald AONB as concluded by the AONB Setting Analysis Report.

Minerals Safeguarding5.50 It is acknowledged that the adopted Kent Minerals and Waste Local Plan 2013-2030 (September 2020) confirms that Land at Badsell Farm is located within a designated area of sandstone as part of the Upper Tunbridge Wells Sand Formation.

5.51 Site allocation Policy STR/SS1 (Part 11) requires consideration for potential mineral deposits on the Western and Eastern land parcels of site allocation Policy STR/SS1 and for any viably workable minerals should be extracted prior to development commencing on the site.

5.52 As currently drafted the policy is unsound as the requirement for prior extraction of mineral before development can commence would affect the delivery of key strategic infrastructure at Paddock Wood and, in turn, delay when benefits (including regeneration benefits associated with Paddock Wood Town Centre) could be realised. As such, Dandara objects to the current wording of the policy.

5.53 This approach has recently been considered through the examination of the South Oxfordshire Local Plan in a similar context where, at Paragraph 295 of the Inspector Letter, it was confirmed that a similar policy to STR/SS1 (Part 11) would not be consistent with Paragraph 204 (D) of the NPPF (2019). In that case, and as advocated here, we suggest that the policy is amended to include reference to "encouraging developers to extract minerals prior to non-mineral development taking place where this is practical, viable and environmentally feasible".

Housing Delivery5.54 The Council's Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan (February 2021) that allocation STR/SS1 is to deliver between 3,490 – 3,590 new homes with an average delivery of 300 dwellings per annum (dpa) in the medium - long term; 2025/26 – 2036/37.

5.55 Dandara support the planned growth and quantum of homes at Paddock Wood. Dandara also strongly endorse Policy STR/PW1 which suggests the western land parcel of Paddock Wood should be delivered in two parts referring to Dandara's and Crest Nicholson's separate land interests.

5.56 Dandara note that Draft Policy STR4 (Ensuring Comprehensive Development) promotes comprehensive site development. Whilst Dandara support the thrust of this policy, it should be amended to reflect a more flexible approach to housing delivery in the strategic allocations. For example, where land parcels that are not inter-dependent one another to come forward, as in the case of the Western Parcel of Paddock Wood (Policy STR/SS1) this will allow two parcels to be delivered independently in the interests of the timely delivery of new homes and to ensure that any delivery issues with one land parcel do not unnecessarily delay and fetter development elsewhere. Dandara suggest the detail and phasing of the strategic sites could be worked through the Framework Masterplan SPD process and would ensure that Policy STR/SS1 is "effective" in accordance with Paragraph 35(c) of the NPPF.

5.57 Land at Badsell Farm is suitable and has capacity for circa 500-600 dwellings. However, Dandara suggest the average delivery figure of 300 dpa is overly conservative when factoring this is a strategic allocation and this delivery figure is shared across principally four strategic sites. Dandara recognise the need to demonstrate a regular and achievable rate of supply to an Inspector but, suggest a delivery rate of circa 350-390 dpa is more suitable and realistic.

5.58 Dandara wish to draw the Council to their Knights Park scheme were 70-100 dwellings were delivered per annum.

5.59 On the Badsell Farm site alone, the site is available and there is nothing preventing the site being delivered in the medium – long term i.e. 2025/26 – 2032/33/34. Dandara expect to deliver circa 75-100 dpa as part of a multi-phased development. The Council's trajectory should be revised accordingly in the interests of being "justified" and found to be "sound" by an Inspector in accordance with the NPPF.

Development of the site will secure appropriate “green”, “grey” and “blue” infrastructure, as including open space and landscape provision, as well as access and on-site drainage infrastructure.

Neighbourhood Centres5.60 Site allocation Policy STR/SS1 (part 2b) identifies Land at Badsell Farm as having potential for one of three new neighbourhood centres with an overall, combined floorspace cap of 2,000 sqm commercial floorspace (Class E). Dandara welcomes this neighbourhood centre allocation in the interests of good placemaking, providing complimentary services and local facilities to support new housing and creating sustainable communities in accordance with the NPPF, PPG and the Government’s recent Living with Beauty publication (January 2020).

5.61 However, Dandara would like to understand who is delivering the neighbourhood centre and what are the timescales envisaged for its delivery.

Infrastructure5.62 We are continuing to work with TWBC through the strategic working group to consider the information presented in the Infrastructure Delivery Plan and reserve the right to comment further on this during the formal examination process as necessary. Below we have set out principal comments in respect of the ‘headline’ infrastructure provision.

Sports Provision5.63 Site allocation Policy STR/SS1 (parts 2d and e) proposes the creation of a new sports/leisure hub and possible health centre which have been promoted by the Council on Dandara’s land (some also extends to the land of Crest Nicholson). The Policy STR/SS1 states:“...a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities. Around 10 hectares of land should be safeguarded within the western parcel (edged in blue on Map 27), to the south of the railway line and to the east of the A228 for this purpose”.

5.64 The reference in the policy to ‘could’ creates ambiguity as what is required to be delivered as part of the policy vs what TWBC has aspirations to deliver on the site (i.e. beyond the requirements of CIL 122). As set out further below, there is no justification for a swimming pool to be delivered based on the evidence base and scale of the allocation, however, we appreciate that TWBC may have its own aspirations to deliver more transformational infrastructure benefits alongside the allocation to seek to address existing deficiencies in Paddock Wood that are highlighted in the evidence.

5.65 Dandara’s position of open space and sports provision is summarised as follows:1) The land for the Council promoted sports/leisure hub area is available if it is considered appropriate/necessary and based on local sports / open space needs;2) Dandara can in any event meet the open space / play space needs of major residential-led mixed use development on-site own site and is not reliant on other sites coming forward or not;3) It is therefore for the Council to provide robust evidence as to why the amount / type of sport/leisure provision and location, what layout is required, as well as to ensure appropriate access, including necessary public transport connections.

5.66 The Council’s Tunbridge Wells Retail and Leisure Study (April 2017) indicates the existing need for a new swimming pool in Paddock Wood, independent of the allocation. The Council’s Indoor/Built Sports Facility Needs Assessment (June 2018) indicates the requirement for a new 25m swimming pool in Paddock Wood, to meet current and future growth (our emphasis) as part of the new Local Plan but is not specific to the strategic allocation at Paddock Wood and does not specify where. Dandara note that the emerging evidence base suggests a need for half a new swimming pool in Paddock Wood based on the proposed strategic allocation only.

5.67 The Council’s Playing Pitch Strategy 2017-2033 (November 2017) states that the urban expansion of Paddock Wood generates a demand for a series of play pitches including 5 x adult 11 vs 11 pitches, 2 x junior 11 vs 11 pitches, 2 x junior 9 vs 9 pitches, 3 mini soccer 7 vs 7 pitches and 2 mini soccer 5 vs 5 pitches. The strategy includes a new sports hub with grass and 3G runner crumb pitches.

5.68 The Council’s Tunbridge Wells Borough Council Open Space, Sport and Recreation Study (June 2018) confirms that Paddock Wood currently has a sufficient supply of all typologies except for youth play space. The study confirms there are ‘gaps’ in access to children’s play space in the north west of Paddock Wood.

5.69 The study highlights the potential for additional youth facilities (or expanding existing ones) within parks and recreation grounds. The study was based on the planned growth at Issues and Options stage and the need for 7,928 dwellings and to accommodate 17,600 new dwellings. This evidence base has not been updated to reflect the Draft Local Plan and the open space and play space requirements specific to Paddock Wood.

5.70 Dandara's emerging concept masterplan (see Figure 6 above) includes the 10Ha of safeguarded land for the Council's new sports/leisure and health hub in accordance with Site allocation Policy STR/SS1 (parts 2d and e). An initial open space assessment has been undertaken which confirms the following quantities of open space in Table 2 below which are considered likely to be needed on the basis of delivery of between 500 and 600 new homes. 5.71 Dandara's emerging concept masterplan currently shows the quantities of play and allotment typologies, and in addition provides significantly more amenity and parks and recreation space to better reflect the site's landscape setting and character.

5.72 The above review of the open space requirements of Capel Parish and Paddock Wood indicates that the use of Land at Badsell Farm for the provision of sporting facilities and youth play space would help to address a deficiency. Analysis of walking distances also indicated that a sports hub in this part of the site may be best suited to provision of some, but not all, of the sporting and leisure needs of Paddock Wood, raising the potential that the Site could deliver the sports fields use, with the built form elements (e.g. a swimming pool or leisure centre) being located elsewhere.

5.73 Dandara fully acknowledges the need for appropriate sports and leisure provision to be provided as part of the package of infrastructure that is delivered with the allocation. Whilst Dandara would not be responsible for building the facility proposed, Dandara supports the principle of safeguarding land on the site to ensure that, through the masterplanning process, this need is met, if the location/type is considered to be appropriate and necessary.

5.74 As part of the masterplanning process ahead of the submission of planning applications on the site, it is prudent to consider what implications the proposed sports hub allocation would have for the existing Putlands Sports & Leisure Centre. The existing sports and leisure centre are arguably better placed, geographically, to benefit both the emerging and existing population of Paddock Wood and, as such, it may be a better opportunity for financial contributions to support the improvement and expansion of this facility. In addition, what are the implications of a new sports/leisure hub at Land at Badsell Farm, Western Paddock Wood on this facility, can the two sports/leisure hubs operationally work together and will they have a different sports offering?

5.75 Therefore, Dandara supports the approach to safeguarding land in the Structure Plan for a proposed leisure, sports and recreation use so allow this to be considered further through the masterplanning process to determine exact open space / sports provision requirements, which are viable and both appropriate and necessary in this location.

5.76 Dandara seek additional clarity from TWBC on the type and quantum of sports provision they are looking to accommodate on Land at Badsell Farm, Western Paddock Wood. It is acknowledged this will be informed by the masterplanning process and preparation of Framework Masterplans but it is not clear how much of the above identified sports pitch and other facility demands can be met on site, timescales for delivery and who will deliver this major sports and leisure infrastructure.

5.77 Dandara also suggest Draft Policy STR/SS1 is amended to clarify that the delivery of a sports/leisure hub will be a matter to be specifically dealt with through an equalisation agreement / pooled planning obligations, and crucially, that the provision of land will be counted as part of Dandara's share of these contributions.

Highways Approach 5.78 Proposed strategic growth at Paddock Wood is supported by new highway and transport infrastructure requirements. Site allocation Policy STR/SS1 (part 7) seeks to secure the phased delivery of highway and transport infrastructure, including on- and off-line improvements to the A228 around Colts Hill and the provision of a new highway to bypass Five Oak Green.

5.79 The Council's Infrastructure Delivery Plan (March 2021) confirms this new A228 Colts Hill bypass is of critical importance and is required in the medium term. Dandara however note that the Council's evidence base (including the Transport Assessment Report Update, March 2021 and Strategic Sites and Infrastructure Study 2021) confirm that the provision of a new highway which bypasses Five Oak Green is only required for the development of Tudeley Village. As stated at Paragraph 6.34 of the Strategic Sites and Infrastructure Study (2021): "Therefore, it is recommended that should Tudeley Village come forward, a link road is needed to reduce highway trips through Five Oak Green. The link road would need to join the A228 near Colts Hill".

5.80 Furthermore, under the Paddock Wood 'only scenario' it is confirmed at Paragraph 6.76 that this would result in the removal of the need for the Five Oak Green Bypass.

5.81 In this context, as drafted Policy STR/SS1 (part 7) is not justified in requiring contributions to be made by Paddock Wood allocations to the provision of the Five Oak Green bypass. Whilst we

acknowledge that as a result of the cumulative nature of the schemes they may be a requirement to make a proportional contribution, this is not currently reflected in the wording of the policy which reads as if the bypass is a pre-requisite for the development of Paddock Wood, when the evidence suggest to the contrary, that it is not necessary.

5.82 Accordingly, Dandara object to Policy STR 6 (Transport and Parking) part c) 'Highway Network' on the basis that the provision of the Five Oak Green bypass and measures along the A228 do not relate to the Western Parcel and therefore are not directly related. This policy should be amended accordingly so it is consistent with Paragraph 56(b) of the NPPF.

5.83 In addition, and in a similar vein, Policy STR/SS1 (part 15) should be amended to distinguish between the development of Paddock Wood and Tudeley. The reference to 'or a version of this document as amended should be replaced with the reference to the document upon which the viability assessment to inform the allocation has been undertaken. Without this the policy is left unclear and unambiguous as to its intentions.

5.84 In light of the above, Dandara seek assurance from TWBC that all such infrastructure contributions are strictly necessary to Land at Badsell Farm to make the development acceptable in planning terms; are directly related to the development; and are proportionate and therefore, fairly and reasonably related in scale and kind to the development in accordance with the planning obligation tests set out at Paragraph 56 of the NPPF.

5.85 Dandara also note that the emerging Paddock Wood and East Capel Structure Plan shows an indicative bus route through the Western parcel connecting to the proposed sports/leisure hub with access from Badsell Road. Dandara note that the detailed bus route will need to be determined as part of the masterplanning process and agreed with KCC Highways. Dandara can confirm that the development of Land at Badsell Farm is deliverable from independent access to the south, from Badsell Road based on the technical work undertaken.

5.86 Accordingly, Dandara suggest that sufficient flexibility is shown in the Council's revised Structure Plan and Policy STR/SS1 specifically mentions that internal road layout and access will be determined by the masterplanning process and negotiation with KCC Highways.

Pedestrian and Cycling Approach 5.87 As set out in the enclosed Landscape Concept Development report (June 2021), Dandara's emerging concept masterplan for Land at Badsell Farm has been informed by the Tunbridge Wells Strategic Masterplanning and Infrastructure Study Design Principles. In respect to highways and pedestrian and cycling principles, the emerging concept masterplan proposes east to west connecting paths/cycle paths which connect the site (including the proposed sports/leisure / health hub) to existing and proposed crossing points over Gravelly Steams, to existing paths within the south-west of Paddock Wood. Dandara consider the emerging concept masterplan to satisfy the pedestrian and cycling design principle.

Rail Crossing 5.88 Site allocation Policy STR/SS1 (part 2i) seeks the requirement for a new north-south pedestrian and cycle link over the railway line (within the western parcel). Whilst Dandara support this infrastructure, it is considered this should be an aspiration rather than a requirement. Further detail is required on how this will be delivered and funded. It is also acknowledged that it may not be possible to deliver the railway crossing as this will require agreement with Network Rail who will undertake the relevant works.

5.89 Dandara are mindful that there are already significant infrastructure costs to be secured via S106 financial obligations and the new pedestrian/cycle bridge is not necessary to facilitate access from Land at Badsell Farm site to primary connections of Paddock Wood Town Centre and Paddock Wood Railway Station as part of ensuring sustainable development and ensuring planning obligations requested by the Council are necessary; directly relate to the development; and fairly and reasonably related in scale and kind to the proposed development in accordance with the key planning obligation tests set out under Paragraph 56 of the NPPF.

Community Infrastructure Levy 5.90 The Council do not currently have an adopted Community Infrastructure Levy (CIL) Charging Schedule. However, the Council are expected to prepare a CIL Charging Schedule in parallel to the submission and Examination of the emerging Local Plan. Dandara seek clarity on the Council's approach to CIL and associated timing. Dandara also seek further clarity on the role CIL will have for strategic allocations such as Paddock Wood.

5.91 Given the exhaustive list of new infrastructure requirements and 40% affordable housing requirements, it is strongly advocated that the strategic allocations including Policy STR/SS1 have a

zero CIL rating for all development uses as part of encouraging the delivery of these major-scale and complicated sites. The development of Land at Badsell Farm will be able to deliver any necessary infrastructure provision on-site through S106 contributions as necessary and therefore will not burden existing infrastructure, which could justify a CIL contribution.

5.92 Dandara suggest TWBC review Policy STR 5 (Infrastructure and Connectivity) in light of the soundness tests set out at Paragraph 35 (a-d) of the NPPF to ensure the approach to infrastructure contributions is positively prepared; justified; effective and consistent with national policy, specifically, Paragraph 56 of the NPPF and the CIL Regulations 2010 (as amended).

Ensuring Clarity in the Policy STR/SS15.93 Dandara support the Council's approach to the requirement for the production of four Framework Masterplan SPDs that are governed by the overarching Structure Plan.

5.94 However, Dandara are mindful that Paragraph 16 (Part d) of the NPPF requires Plans to: "d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".

5.95 With reference to Paragraph 16 of the NPPF, and as stated in Dandara's previous Draft Local Plan (Regulation 18) representations (dated November 2019), Policy STR/SS1 should be restructured to provide individual policies or 'sub policies' with specific criteria for each of the four strategic land parcels and in doing so reduce the length of, and simplify, the wording of this site allocation policy. This would allow specific design and policy criteria to be tailored to the individual land parcels, and make it clear what is to be delivered for each of the four strategic parcel areas and include some general criteria that applies to the entire strategic allocation.

5.96 The revised policy wording set out above would also assist Applicant's with future masterplanning and progression to pre-application and planning application stage as well as assisting Council Officers in applying the policy as part of the determination of future applications. We also consider that it would be of benefit to ensuring that the policy is easily understood by members of the public and the local community. We look forward to working with TWBC and the other land promoters at Paddock Wood through a Statement of Common Ground to achieve the necessary changes.

5.97 This approach would also allow the specific infrastructure items in the Council's Infrastructure Delivery Plan to be assigned to the four strategic land parcels or masterplan areas thus making it clear who is paying for what and also to ensure there is no double counting.

5.98 Dandara also suggest additional flexibility is built into masterplanning approach to Policy STR/SS1 to recognise that the distribution and quantum of development and specific parcel layout will be progressed by the next master planning SPD stage and then future planning applications for each parcel that are submitted in general accordance with the adopted Framework Masterplan SPD, again allowing for flexibility within the detailed scheme design.

5.99 To be clear, Dandara is supportive of site allocation Policy STR/SS1 subject to the proposed policy amendments in the interests of soundness as summarised in Appendix B. The proposed restructure of the Policy STR/SS1 would make the policy more targeted and succinct and importantly, more robust in relation to the key policy tests set out at Paragraph 35 of the NPPF. It is acknowledged that the proposed amendments to Policy STR/SS1 will be refined through the SoCG with TWBC.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to Table 3 of Dandara's Reg.19 Written Representations Report prepared by CBRE (June 2021). In summary the proposed amendments are set out below:

STR/SS1: Part 1-15 Policy STR/SS1 should be restructured as follows:

- . Provide individual policies or 'sub policies' with specific criteria tailored to each of the four strategic land parcels or Masterplan Areas. The specific design criteria specific and directly related to each strategic land parcel will help guide future development.
- . Specific criteria for each strategic land parcel should provide sufficient flexibility to acknowledge that the distribution of development within the parcel areas to be determined by the Masterplanning process.
- . General policy criteria should be provided that relates to the entire Paddock Wood strategic allocation.
- . Specific infrastructure items in the Council's Infrastructure Delivery Plan to be assigned to the four strategic land parcels or masterplan areas thus making it clear who is paying for/delivering what and also to ensure there is no double counting.

Proposed restructuring of Policy STR/SS1 would make the This will reduce the length of, and simplify, the wording of this site allocation policy and make it more user friendly.

This approach will also allow specific design and policy criteria to be tailored to the individual land parcels thus making it more targeted, robust and justified in accordance with Paragraph 35 of the NPPF.

STR/SS1: 2 (part a) Dandara support the proposed quantum for the entire strategic allocation however Part 2 (a) should read "between" not "approximately" 3,490 – 3,590 dwellings". The proposed change will make the policy more precise and robust and justified in accordance with Paragraph 35 of the NPPF.

STR/SS1: 2 (part b) Dandara welcomes this neighbourhood centre allocation. Dandara however seek clarification on who is delivering the neighbourhood centre and what are the timescales envisaged for its delivery. Additional detail on the delivery of the neighbourhood centre allocation would make the policy criteria more robust in accordance with Paragraph 35 of the NPPF.

STR/SS1: 2 (part d) Draft Policy STR/SS1 should be amended to clarify that the delivery of a sports/leisure hub will be a matter to be dealt with through an equalisation agreement / pooled planning obligations, and crucially, that the provision of land will be counted as part of Dandara's share of these contributions. The proposed amendments will add more certainty to the delivery of sports/leisure provision and to ensure infrastructure costs are evenly distributed across the strategic parcels and future planning obligations satisfy the necessary tests: "necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development" in accordance with paragraph 56 of the NPPF.

STR/SS1: 2 (part i) Whilst Dandara support this infrastructure, it is considered this should be an aspiration rather than a requirement. Further detail is required on how this will be delivered and funded. Further justification is required to ensure the proposed planning obligation(s) requested by the Council are necessary; directly relate to the development; and fairly and reasonably related in scale and kind to the proposed development in accordance with the key planning obligation tests set out under Paragraph 56 of the NPPF.

STR/SS1: 7 Policy STR/SS1 (part 7) is not justified in requiring contributions to be made by Paddock Wood allocations to the provision of the Five Oak Green bypass. The policy should be re-worded to remove this requirement as it is not a pre-requisite for the development of Paddock Wood and is not necessary. Dandara suggest that sufficient flexibility is shown in the Council's revised Structure Plan and Policy STR/SS1 specifically mentions that internal road layout and access will be determined by the masterplanning process and negotiation with KCC Highways.

Further justification is required to ensure the proposed planning obligation(s) requested by the Council are necessary; directly relate to the development; and fairly and reasonably related in scale and kind to the proposed development in accordance with the key planning obligation tests set out under Paragraph 56 of the NPPF.

STR/SS1: 11 As currently drafted the policy is unsound as the requirement for prior extraction of mineral before development can commence would affect the delivery of key strategic infrastructure at Paddock Wood and, in turn, delay associated regeneration benefits. Dandara suggest that the policy is amended to include reference to “encouraging developers to extract minerals prior to non-mineral development taking place where this is practical, viable and environmentally feasible”.

The proposed change will make the policy more targeted and robust and justified in accordance with Paragraph 35 of the NPPF.

STR/SS1: 15 Policy STR/SS1 (part 15) should be amended to distinguish between the development of Paddock Wood and Tudeley. The reference to ‘or a version of this document as amended’ should be replaced with the reference to the document upon which the viability assessment to inform the allocation has been undertaken. Without this the policy is left unclear and unambiguous as to its intentions.

The proposed change will make the policy more targeted and robust and justified in accordance with Paragraph 35 of the NPPF. Further justification is required to ensure the proposed planning obligation(s) requested by the Council are necessary; directly relate to the development; and fairly and reasonably related in scale and kind to the proposed development in accordance with the key planning obligation tests set out under Paragraph 56 of the NPPF.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Dandara wish to participate in the hearing session to discuss their representations and to provide further evidence to assist the Inspector where necessary in the interests of ensuring the emerging Local Plan, its strategic allocation policies and all other strategic and development management policies can be found to be sound and meet all the specific soundness tests set out at Paragraph 35 of the NPPF.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

4.9 The Council's supporting Sustainability Appraisal (SA) sets out the preferred growth strategy of securing a planned strategic extension at Paddock Wood based on garden village principles, supplemented by the creation of a new garden village at Tudeley Village and promotion of new growth at existing settlements.

4.10 The production of the SA is a key evidenced based document in understanding whether or not the approach to the spatial strategy is sound. The NPPF (2019) introduced a subtle but important change to the definition of ‘justified’ with the requirement now for ‘an appropriate strategy’ rather than ‘the most appropriate strategy’.

4.11 The SA (February 2021) includes the assessment of 8 alternative options for the spatial strategy. In presenting a robust approach the SA (February 2021) correctly considers the implications for the spatial strategy in including Paddock Wood in some options and excluding it from others.

4.12 Paragraph 6.2.13 of the SA (February 2021) succinctly summarises the consequences for sustainable development if an alternative spatial strategy was pursued which sought to focus growth exclusively in the main town and main town and villages. In the assessment it is noted that the exclusion of Paddock Wood (and in turn the additional pressure that this would place on other areas to accommodate growth) would have a detrimental impact upon 8 of the SA objectives including: objectives of business growth, climate change, deprivation, employment, health, services, travel and water. The assessment work undertaken provides a sound basis to inform the proposed spatial strategy with the approach representing an appropriate strategy (as required by the NPPF).

4.13 At the more detailed policy level, the SA provides a rigorous and robust testing of the 11 Local Plan strategic objectives against the 19 SA objectives and confirms there are no sustainability objectives that are more incompatible than compatible with the Local Plan objectives.

4.14 The SA explains the Council's assessment of their growth strategy options as set out in the Issues and Options stage SA (2017).

4.15 The Council's site assessment review includes assessment of potential development sites and reasonable alternative sites. Dandara support the scoring for Land to the north of Badsell Road, Five Oak Green, Paddock Wood (Site ref. 142) as part of strategic allocation STR/SS1 and TN12 Land off Copthall Avenue and Highgate Hill, Hawkhurst (Site ref. 78); and Land at Speldhurst Road, Southborough (Site ref. 100). Dandara consider the review of these development sites to be accurate, robust and informed by proportional evidence in accordance with Paragraph 35(b) of the NPPF.

4.16 However, Dandara disagree with the findings of the reasonable alternatives site assessment, land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (Site ref. 120). This is discussed further on in this submission, however, this site was a largely neutral scoring site and comprises a small greenfield site within the settlement boundary and not located in the AONB and is proposed for medium scale residential redevelopment.

4.17 Dandara support the Council's SA subject to the above comments on the Council's strategic objectives, consider it to be robust and satisfies the relevant legal requirements including SEA in accordance with Paragraph 32 of the NPPF.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ian Davis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ian Davis [REDACTED]
Comment ID	PSLP_1401
Response Date	04/06/21 16:23
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Ian Davis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My wife and I have here at Colts Hill since the summer of 1993, her family having lived and worked in the parish of Capel for generations. It remains a beautiful corner of the Garden of England largely unspoilt Green Belt of small hamlets and villages set out amongst small woods and good quality arable land.

The proposed housing development for Paddock Wood and East Capel is unsound on a number of important and key issues.

Paddock Wood is already subject to two significant and unfinished housing developments. The proposed plan makes inadequate provision for accommodating the substantial increases in traffic levels in the immediate and wider area adder to these ongoing developments and there yet to be seen impact. Paddock Wood has been subject to considerably housing development since the 1960s yet nothing has been done to provide a proper road infrastructure. The B2160, the Maidstone Road, is subject to congestion caused by parking on the carriageway which is particularly challenging to the buses and HGVs which have to access local businesses. This is no more apparent that those delivering to the Waitrose supermarket which have the further gauntlet of traversing Commercial Road, the center of the village.

To the south of the village on the B2160 is the junction with the B2017 from Tonbridge, the A228 and the proposed new development west of Paddock Wood and in East Capel. Residents of the proposed new development will have to traverse this already busy junction when seeking to access the village amenities and because of the weight restriction on the railway bridge on the B2160(7.5t), this route, the B2017, is also the access for HGVs. It is single carriageway road with a narrow pavement on its north side.

Traffic from the proposed development heading west reaches the A228 and may proceed westely on the B2017 towards Tonbridge and the A21 or turn south towards Tunbridge Wells.

The B2017 linking Tonbridge to Paddock Wood is a winding rural single carriageway with pavements only provided within Five Oak Green. Within Five Oak Green residential parking on the carriageway already impedes the smooth flow of traffic which is exacerbated during the morning rush hour past the Primary School when children are being dropped off. I have commuted daily from Colts Hill through to the A21 at Tonbridge for over 25 years and this 4 mile journey can often take upto 40 minutes if there is the simplest obstruction. Added to this morning congestion is the school traffic entering the Schools at Summerhill where the queues there tail back onto the carriageway and can cause tailbacks back beyond the turning for the Hartlake Road. Traffic heading easterly from the proposed development would have to negotiate Five Oak Green itself before arriving at the A228 where if then turning South

towards Tunbridge Wells will substantially add to the significant congestion heading up Colts Hill. Other minor roads in the area are already subject to significant levels of rush hour traffic and many of these are single carriageway country lanes.

Looking across the north of the Tunbridge Wells Borough poor road infrastructure provision is evident wherever you look. The A228 from the B2017 south to the A264 interchange with the A21 has been subject to a proposed bypass for over 30 years, the A228 being the important link between the two primary Hospitals serving West Kent. But the A264 itself as it heads into Tunbridge Wells is substantially congested not only at peak times all the way through to the center of the town. Similarly at the western end of the B2017 turning south westerly towards the A21, the A26 here is also heavily congested at rush hour and traffic turning north westerly on the A26 as it bypasses Tonbridge to its east is already beyond capacity with substantial rush hours queues. Adding 1000s of additional vehicle movements is simply unsustainable and it must also be noted that Tunbridge Wells Borough Council has not adequately consulted the Tonbridge and Malling Borough Council on which a substantial proportion of this additional traffic will fall.

There are further concerns regarding the potential consequences of this new development upon the water table and increases in flooding of the surrounding area. The proposed development is low lying land alongside the Tudeley Brook and a previous housing development to the south of Paddock Wood saw a number newly built homes subject to subsidence after completion.

The proposed development would also see a reduction in amenity as a number of tranquil footpaths through arable land would be obliterated.

The Inspector is urged to be aware of the other proposals for housing development, not only STR/SS3 for the new village at Tudeley to the west but also the machinations of Maidstone Borough Council in respect of a housing development at Beltring adjoining Paddock Wood towards its immediate north. The piecemeal approach does a great disservice to the people of Paddock Wood and Capel and the cumulative affects of all of these developments is the destruction of our rural environment.

In summary, a) the proposed development is inappropriate in the Green Belt, b) will completely gridlock the entire road network in this rural corner of the Borough, c) the plan is not properly integrated either within the Borough itself or strategically within the wider area of West Kent, d) loss of amenity, e) lack of strategic planning across Borough and West Kent.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

This proposal is not sound and inappropriate in this rural setting.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input checked="" type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
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Comment

Consultee	Mr Tom Davis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Tom Davis [REDACTED]
Comment ID	PSLP_427
Response Date	21/05/21 12:00
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Other
Version	0.8
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr Tom Davis
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policies Map 4

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

BackgroundI have lived in this area since 1993 when I moved to Mile Oak . When I was working I commuted by car and over the years I have seen that the volume of traffic on what were previously quiet country roads around Paddock Wood has increased exponentially, these roads being quite unsuited for heavy traffic loads . I have also regularly experienced long delays caused by volume of traffic when getting onto and off the A21 at Kippings Cross, on Pembury Road into Tunbridge Wells and any on road into Tonbridge from Paddock Woodside. Development of the scale as proposed by TWBC will overload our crowded local road network.

Development on farmlandThe use of prime agricultural land as first choice (easy choice ?) for development is detrimental to the national good and I oppose it in principle.

The development Tunbridge Wells plan for Paddock Wood and Caple is flawed as it does not take into account the post "Brexit" reality where there is now extreme pressure for national self-sufficiency in food production . As the plan does not take this into account approval for development of any prime farm land should not be given. Prime arable land in the UK is not infinite.

In particular, the land in the South East corner of the plan is presently in full productive use growing many acres of blackcurrants, approval for development here should not be given. The nation cannot afford loss of land from food production to built development.

The Prime Minister stated to parliament on 3 May 2021 new housing development will be on BROWN FIELD sites.

Climate CrisisThe plan is flawed in regards to climate change as it does not take in to account the loss of the many acres of land currently in use for food production. Loss of valuable agricultural land results in the increased importationof food and so adding global warming pollution by additional emissions resulting from shipping across the globe .The need to reduce "food -miles" in the face of a climate crisis has been ignored in this plan.

Traffic CongestionIf the plan for the development of land for housing in the South East Corner is approved traffic flow heading for Tunbridge Wells, East Grinstead, Gatwick and A21 heading South will go up Pixot Hill, through Brenchley and Matfield. These roads cannot handle this traffic and Brenchley is a pinch point. TWBC cite a report of a survey they commissioned estimating a ridiculously low figure of 3% of traffic from the new development will head this way to head South to the A21 - this report is flawed - (Stantec report 6.6.2). The plan should be rejected

As supporting evidence I can provide an *accurate* survey - I live in Mile Oak adjacent to the proposed development in the South East corner where 1500 houses might be built, to head south or , if I want to go to Tunbridge Wells , I drive through Brenchley and Matfield to join the A21, so from first hand knowledge I can state that figure of 3% proposed by TWBC in the report they commissioned is wildly wrong. I estimate that 50% plus of my car trips go through Brenchley to the A21 (and 100% of my trips in to Tunbridge Wells go this way) and traffic from the proposed development for the East and the South East Corner will certainly follow the same route. The impact on the narrow streets of Brenchley will be significant and the plan does not accurately assess this and should be rejected

Within the plan (in the LCWIP phase 2 report) there is also a proposal to close the railway bridge on Maidstone Road, Paddock Wood, to all traffic other than buses This will create "rat runs" on Wagon Lane, Lucks Lane and Queen Street for cars, vans and small lorries heading south and wanting to access the eastern side of Paddock Wood, an area where a very large development is proposed, bringing heavy volumes of traffic on to narrow rural lanes. The plan does not take this into account as is therefore flawed

Flooding

If the proposed sites in the south east corner of Paddock Wood are converted from agricultural to built development the removal of so many acres of fruit production will cause the ground water table level will rise and so damage properties along Mile Oak Road, properties in Catts Place Cottages along this road.

Protection of Heritage Assets - The plan is flawed in respect of the historic hamlet of Mile Oak (where 50% of the properties are listed) which is in Brenchley parish, Mile Oak lies immediately adjacent to the Paddock Wood boundary. The proposed development site in the South East corner would directly connect Mile Oak into the urbanisation of Paddock Wood. Any development work in the South East corner would destroy the nature and value of Mile Oak hamlet as an heritage asset unless a clear greenfield gap maintained. This a specific and strong reason why the south east corner should not be considered for development.

In the plan no mention been made about considering the rural setting and heritage asset value of the listed buildings in Mile Oak hamlet. To repeat, the plan is flawed in this regard and should be rejected

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Comment

Consultee	Paul de Ste Croix [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Paul de Ste Croix [REDACTED]
Comment ID	PSLP_23
Response Date	05/04/21 15:10
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Paul de Ste Croix
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Significant representations were made to TWBC during the regulation 18 consultation period none of which were answered or addressed by the council.

The proposed development is on green belt, on a flood plan, unserved by suitable infrastructure including public transport, road networks, doctors surgeries and schools and is in or very adjacent to an area of outstanding natural beauty.

Should this development go ahead its geographical position in relation to the amenities Tunbridge Wells affords is such that residence will pay council tax to TWBC but use very few if any of TWBC amenities. Instead they will rely on amenities provided by Tonbridge which is significantly closer to the development but falls under a different local council. This is bad enough even before you consider that the plan itself admits that road links between Paddock Wood and Tonbridge are poor and not suitable for expansion. How then will people get to Tonbridge where the nearest supermarkets are located?

Paddock Wood is already overdeveloped for its infrastructure and amenities and is certainly not the self sufficient, bustling town the plan portrays it as. This development will make the situation significantly worse in every regard save for TWBC revenue.

With no proper public transport infrastructure this development relies on multiple vehicle homes which will inevitably and significantly increase traffic on roads that are already unfit for current traffic levels. Cycle and foot paths will not be used by people taking children to school or going to work for the overriding majority of new residents.

This element of the local plan is fundamentally flawed and TWBC have until now refused to acknowledge that. Please put a stop to this outrageous proposal to irreversibly ruin a significant area of outstanding natural beauty.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This section of the local plan should be scrapped.

Tunbridge Wells has significant brown field sites that should all be developed before a single green field site is even considered for development.

As and when this has happened improvements to infrastructure including roads, public transport, schools, public health and community centres should be in place BEFORE developments of this magnitude are allowed. For the plan to say these things are being considered is simply not good enough.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ms Kathryn Dellow [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ms Kathryn Dellow [REDACTED]
Comment ID	PSLP_508
Response Date	27/05/21 11:08
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Kathryn Dellow
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Paragraph number 4.12

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a resident of Nursery Road, just on the other side of the railway bridge from the High Street / Commercial Road side of Paddock Wood. I have lived here for four years, and my young children attend Brenchley and Matfield School around 3 miles away in Brenchley. This was felt to be a better fit than Paddock Wood School for my eldest who had some developmental difficulties at school selection time.

I take my children to school from my home, over Paddock Wood railway bridge, every morning at around 8.20am - 8.30am, returning to work from home at around 8.50, and the same round trip at pick up time (3.00pm to 3.45pm). The railway bridge is not congested or even particularly busy at these times, or at any other time of the day that I use it (e.g. at afternoon/evening rush hour). If the new houses go ahead in Paddock Wood, they will be situated on the 'right' side of the bridge for all the amenities, so I can't see that the proposed developments will add a large number of journeys over the bridge either.

If the bridge is closed, I will still have to drive my children to school due to the distance and the lack of pavements for walking, but I will have to go a long way round adding probably more than 10-15 minutes to every journey and therefore increasing emissions etc. I would anticipate that the majority of houses on this side of the bridge would be in the same boat. Added to this, my likely route would be via the Hop Farm / A228 and then back along the B2017 (Badsell Road) past the new development, so this will make any additional traffic from development even worse.

Closing the bridge will under no circumstances 'reduce the number of vehicle trips in the town' as stated in the plan. It will simply mean that all of us on the 'wrong' side of the bridge will have to drive a long way around to get over the railway, therefore INCREASING traffic past the Hop Farm and along the A228, or worse still having people zooming along single track country lanes such as Wagon Lane and Queen Street. The plan actually states that the bridge is the only road over the railway in Paddock Wood – closing it is completely illogical. People won't walk to the Paddock Wood supermarkets and lug their weekly shop back – they'll get in the car and drive the long way round, or probably more likely carry on and take their business to other towns.

This will cut a significant number of residents off from the local amenities, literally rendering a whole side of the town as 'the wrong side of the tracks'. If new houses are built north of the railway, no one will want them without any vehicular access to the town itself. This has not been thought through at all, and you need to listen to residents on this.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposal to close the railway bridge simply needs to be removed. If necessary, this should be reassessed AFTER any new houses are built, when the level of congestion can be appropriately assessed. Alternatively, solve the problem by building another crossing over the railway, rather than removing the only one that connects one side of the town to the other.

If the proposal is because the road cannot handle the increase in traffic from the new houses, perhaps this is indicative that Paddock Wood / Capel is not an appropriate area for this amount of development to take place. Either improve the infrastructure, or remove the demand. Do not cut residents off from local business.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I would be happy to give evidence as someone who lives in a road that will be deeply affected by this proposal. I make no 'unnecessary' journeys over the bridge, and would be pleased to outline my situation and why this is an ineffective and unsound policy.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Andrew Dewdney ()
Email Address	
Address	 Brenchley TN12
Event Name	Pre-Submission Local Plan
Comment by	Andrew Dewdney ()
Comment ID	PSLP_2082
Response Date	04/06/21 16:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Andrew Dewdney
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I submitted fairly detailed comments for the Regulation 18 consultation, most of which appear to have been ignored, and I am wondering why the Planning policy means that I have to re-submit them so you can see them, and why you shouldn't have access to those Reg 18 consultation remarks.

I was initially bought up in Paddock Wood from the mid 1960s, and attended school in Tonbridge. After university I moved to London and then spent some time abroad, returning to the area in the late 1990s. I have a number of general comments concerning the last 50 years of my experience of living in this area:

- 1 Road Infrastructure: The dualing of the A21 has been discussed since the 1970s, and I remember the section being opened between Sevenoaks and Tonbridge. The only other main road infrastructure that has been added in the 40 years since I left in the early 1980s is the A21 dualing from Tonbridge to Kippings Cross. This is great news but the downside is that it has caused significantly more congestion along the B2160 to and from Paddock Wood. I have often encountered queues back to the Matfield Church to get to the A21 roundabout, and getting through Matfield is a game of cat-and-mouse through the parked cars on the road. This will obviously get worse with the increased housing approved and planned for Matfield and Paddock Wood. Whilst there appears to be little in the plan for new road infrastructure except for the Capel bypass and new "village" development, buried in the TWBC consultation reports are proposals to close the railway bridge at Paddock Wood to anything but buses. This is madness. Where are all these new residents supposed to work (seeing as the local plan is suggesting that the new jobs are going to be largely generated in the industrial estates to the North of the railway)? The local plan should be seeking to develop additional road and bridge infrastructure to cope with the additional load that will be put on it, rather than restricting the existing infrastructure to buses.
- 2 Parking: across the rural parts of the borough, from Sissinghurst to Matfield and beyond, permission has been granted for a large number of homes but with no commensurate increase in off-road parking. Traffic through the villages is now being slowed and queuing - leading to higher levels of pollution and poorer air quality for residents. At a Reg 18 planning meeting I attended in Horsmonden, the planning officer in attendance from TWBC tritely commented that "such queues are good for reducing speeding vehicles". Provision in the plan should be made for sufficient off-road parking for residents and visitors - in order to maintain the capacity of the current road infrastructure to accommodate the vast number of increased residents and traffic this will generate, without any significant improvement in the road network set out in the plan.
- 3 Rail infrastructure: The scheduled journey times to London from Paddock Wood are now longer than when I was getting the train to school in the mid-1970s. Two years ago the Secretary of State for transport canvassed opinion on reducing stopping services between Ashford and Tonbridge (to reduce travel times from Ashford - notwithstanding the High Speed One alternative to Kings Cross). I asked the TWBC planning department representative at the Reg 18 meeting

whether there had been discussions with the operator about capacity given the proposed increase in housing in the borough and in neighbouring boroughs (given the huge developments down the line in Marden and Staplehurst). She responded saying that the rail operator had come back saying that there "may be some additional capacity". She didn't know whether this was at peak times or whether the company would operate longer trains to increase capacity. This seems typical of the TWBC local plan - woolly thinking on real issues and no discussion with neighbouring councils. When I started commuting to London in the 1990s it was possible to get seats up until Sevenoaks in the morning peak. Pre-pandemic it was getting difficult by Tonbridge. The rail services have not been increased to this area since the 1980s yet it is assumed that it will be able to accommodate the vast numbers of new customers along the line. There needs to be some joined-up thinking in government and planning to look at the bigger picture.

- 4 Infrastructure: My parish council has concerns that the TWBC Infrastructure Development Plan (IDP) is incomplete. TWBC should be specifying the core infrastructure assets that need to be in place and be ready by construction or sale of the first phases of house-building. There has been history in of developers being granted planning permission and then putting on hold development after the first phase. TWBC doesn't have the resources to put this in place and is dependent on developers to do so. According to the planning representative at the Reg 18 meeting I attended, this has happened in a Paddock Wood development (to my great surprise the planning representative admitted that the "Paddock Wood contract has been a mistake") and the conditional infrastructure improvements required by the planning permission were not implemented. It is well known that developers are also able to escape "affordable" home numbers after PP on the basis that they make the development uneconomic. This can also happen with conditional infrastructure commitments as developers can go bankrupt, merge or change strategies. To me the TWBC Local plan appears to be development led rather than infrastructure led, which may lead to more contractual mistakes by the Council with developers and risk leaving inhabitants with the housing but not the associated infrastructure improvements to

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I don't feel qualified to comment on the legal nature of the Plan - you are in a much better place to opine on that than the bulk of the 120,000 people that live in the Borough. However, I have a number of comments on the soundness of the local plan:

- 1 As set out in my comments I believe that this plan is development driven rather than infrastructure driven. TWBC have taken the centrally imposed housing targets for the borough and not challenged them. The council has used the standard methodology using 2014 data to calculate the requirement for 678 houses per annum. The council has ignored the ONS 2016 forecast, which would reduce the national housing need from 300,000 houses per annum to 160,000. This would give a requirement for 484 homes per annum.
- 2 I don't think that TWBC has complied with its NPPF requirements to examine reasonable alternatives to the standard methodology. In the Dixon Searle Partnership report it says that TWBC has examined reasonable alternatives but concluded that they are not possible. I can't find any evidence of the council exploring alternatives, nor why such alternatives were rejected, but in a borough with so much AONB and Greenbelt land there could be reasons to question and move away from the standard methodology.
- 3 In addition to the AONB/Greenbelt argument, there have been two major changes in circumstances since the Reg18 consultation in 2019: Covid pandemic and the UK has now left the EU with a

- trade deal for goods, but not services. Both will have a major negative impact on the UK's growth in the coming decades and given that services are not included in the deal, the impact on the City (and many people in this Borough work there) but there is no economic analysis in the Viability Assessment that takes this into account. This is a serious error of omission.
- 4 In the 37 page Local plan viability assessment there are 4 references to Covid and leaving the EU but general waffle about how this will lead to uncertainty - what about modelling the impact of the Borough of a decline in the assumed growth rates that underly the assumptions?

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TWBC has not made it easy to make comments - the local plan website is slow, links don't work properly and access to the documentation is not intuitive. Hence I have decided to submit my comments directly.

I have had an involvement in this borough from my childhood and my children have been brought up here. I don't have the opportunity to elect a planning inspector nor challenge their approvals. Therefore before that inspector opines on what will happen to this area, that is close to my heart, I believe they should speak to as many people as possible and find out the depth of feeling towards this plan. TWBC is changing the shape of this borough, and its historic villages and landscapes, acre by acre. The ruling party has seen its share of the vote fall from 80% 5 years ago to 37% in the last elections. People don't want the plan in its current form and 97% of the 1,100 comments on the Reg 18 process were opposed to it. You will come in, give your opinion and walk away leaving this generation and all future generations in this area to deal with the consequences. It has taken me hours of (unpaid) time reading hundreds of pages of documents, attending meetings, so I think it would be only fair for you to hear me, and others, out.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Closing the railway bridge in Paddock Wood to traffic other than buses is shortsighted and not in the interests of existing residents and the occupants of the massive new development in the plan. More crossings of the railway will be needed to accommodate the increased population.

Why has the walking/cycling strategy paper only recently been commissioned when the TWBC has granted PP hundreds of houses in Paddock Wood already? Again this is evidence of the development led approach by TWBC rather than seeking to put in place the necessary infrastructure plans first. TWBC needs to change its approach to being infrastructure driven.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Bryan Dickson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Bryan Dickson [REDACTED]
Comment ID	PSLP_1650
Response Date	04/06/21 12:45
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Bryan Dickson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been resident in Tonbridge for 30 years and know the area well. I am concerned about the TWBC proposed plan for a number of reasons, some of which are detailed below.

What is also noticeable by its absence is any reference to consultation and co-operation with Tonbridge and Malling BC regarding the affects this plan will have on their residents.

This plan is not considered sound for a number of reasons which are not listed below in any specific order of importance.

This plan will significantly impact local infrastructure. For example (*this list is not exhaustive*):-

- . increased traffic on roads will result in increased local congestion, decreased air quality and an increased carbon footprint (queues on the A26 for example are already lengthy, particularly at peak times);
- . increased use of already overstretched local peak-time rail use is inevitable based on the local connectivity with London and elsewhere (before I retired I commuted to London daily and noticed that trains were increasingly very busy in peak time);
- . there will be increased health care requirements including hospitals, GP surgeries, dentists, etc. which are already strained in the area (getting an appointment is already very difficult);
- . an increased demand on utilities;
- . significant increased demand for local school places which have the additional issue of dropping off and collection times (this is particularly relevant to Capel School that my grandchildren attend and from where we collect then twice a week).

While these points are noted in the plan there is no definitive indication given of how TWBC will "work with" various agencies and providers to deliver the expected increased infrastructure requirements. It is not clear if these will even be possible to deliver in the short and longer term.

Completion of the plan will take over 15 years resulting in increased congestion, and significant disruption to local people. As the proposed development is on the outskirts of TWBC this plan gives all of the benefits of council tax to TWBC but all of the disturbance and hassle to Tonbridge & Malling (e.g. all relevant local infrastructure issues as noted previously and the increased demand for car parking for residents, commuters, shoppers, etc.)

The number of dwellings in the plan is totally disproportionate to the area. The proposal would represent a 500%+ rise in the number of dwellings in Capel. I visit Capel regularly and the rural atmosphere would be destroyed if the planned housing goes ahead). Also interesting is that the Councillor for Capel only represents 2% of the total number of TWBC Councillors.

The proposal is to build on a known flood plain and high-risk flood area. The increased "concreting over" will result in an increased risk of flooding to the area and/or move the water downstream to other

surrounding areas such as Tonbridge, Yalding, East Peckham, Golden Green, etc. where flood mitigation fails. If dwellings are subsequently flooded as a result of the building, this is likely to increase house insurance costs and could result in flood insurance being unobtainable which would have a dramatic and undesired effect on the saleability of property in the area. Should this happen, it is possible that affected residents could have a potential claim against TWBC and their Councillors.

The proposal will destroy about 600 acres of green belt land. Why would this be considered where there are alternative brown field sites that may not have been adequately studied and considered. Equally, a substantial acreage of good quality agricultural land will also be lost forever. This is in addition to a further 200 acres that are due to be quarried as part of the Kent Minerals Plan. This will turn what is now a rural Kentish Parrish landscape into just another concrete conurbation – once green belt land is gone it can't be replaced!

It is also understood that Hartlake Road which links Golden Green to Tudeley may be closed to all traffic if this plan is not approved. A large number of individuals use the road regularly and its closure will add to the congestion on the main road from Tonbridge to Tudeley. This is already highly congested and will increase the pollution from stationary or slow-moving vehicles. There has been no consultation on this because if there had been there would have been a far higher number of objections received.

If TWBC have proposed this plan to meet government targets, what efforts have been made to advise Central Government that their house building targets are not feasible in this area, as Sevenoaks have done? The South East of England is already densely populated and further extensive building and urban sprawl as proposed will add to emissions, further reduce green spaces, and contribute to the further deterioration to local and global climates.

It is clear that TWBC have ignored the unprecedented local response at Reg 18 and have not adequately addressed the concerns raised. Why has there been such a lack of scrutiny and transparency to this plan as it affects a far larger area and population than the corner of the TWBC ward where it is proposed the development is situated? Engagement with the local community in Capel and the surrounding area that will be affected has been totally ineffective as the majority of people that will be personally affected by this plan do not appear to have been honestly and robustly advised of the true effect on them if the plan is agreed. This seems totally inequitable

Question 6

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- . The implications of this plan are not sufficiently or widely known about. This must be rectified by the publication and circulation of a transparent document advising all citizens in all affected areas of the potential impacts of the plan and their opportunity to respond to these.
- . The publication of a detailed plan agreed with all relevant agencies and providers affected by the proposal.
- . Publication of how TWBC have adequately addressed the objections raised in Reg 18.
- . The publication of discussions with Tonbridge & Malling BC relating to this proposal and its effects on their residents.
- . Revisit feasibility of alternative brown-field sites.
- . A substantial reduction in the number of dwellings proposed (maximum 10% of original plan) with these to be on brown-field sites.
- . Push back by TWBC on Central Government housing target for the area.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

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☐ Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_7

Comment

Consultee	Malcolm Dorrington [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Malcolm Dorrington [REDACTED]
Comment ID	PSLP_132
Response Date	21/05/21 13:10
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Malcolm Dorrington- Representation letter.docx (3)
Question 1	
Respondent's Name and/or Organisation	Malcolm Dorrington
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 for Paddock Wood including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in the borough for virtually my whole life and been a resident of Paddock Wood for 35 years, and it seems like we have been having construction work going on here for at least half of that time, at present there are three large developments underway at the same time, all of which is being carried out on former agricultural land, On top of which TWBC want to build another 13,000 houses again on prime agricultural land, this figure is 50% of its target, TWBC are saying that the government is asking to much.

Across the whole borough Paddock Wood and Capel are at the most risk of flooding with the ever increasing autumn and winter rainfall flooding issues have worsened.

We do not have the infrastructure to cope with more housing, the schools are full, the doctors surgeries are full and with the advent of the forthcoming Churchill Retirement Home development on Commercial Road we are losing five existing shops with nowhere to build more.

The country side next door which became so important to the health and well being of residents during the pandemic will be gone forever and there will be no there will be no green space in between, we will no longer be a rural area, we will be a giant urban sprawl.

Please see the document attached under question 8

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please see the document attached under question 8

[TWBC: text of supporting document copied here for ease of reference]:

I have lived in the borough for virtually my whole life and been a resident of Paddock Wood for 35

years, and it seems like we have had major construction work going on here for at least half that time, at present there are three large developments underway at the same time, all of which are being carried out on former agricultural land, on top of this TWBC want to build another 13,000 houses which is 50% of its target, they are actually claiming that the government is demanding too much.

Across the whole borough Paddock Wood and Capel are at the most risk of flooding; it is a fact that with every new development and ever increasing autumn and winter rain fall flooding issues have worsened. It is also a fact that local doctor's surgeries and schools are full, the plan mentions building more surgeries but will they find doctors to fill them, the surgery in neighbouring East Peckham has been closed for a number of years. A new school was supposed to have opened in September 2018 but has never been started; the plan mentions more shops in Paddock Wood but five existing shops are to be demolished to make way for a Churchill Retirement home development in the main street. The National Planning Framework is clear that poorer quality farmland should be preferred, yet the land in question is shown in predictive maps produced by Natural England to be some of the most agriculturally rich land in the borough, yet the planners jumped on it because the current owners put it forward, obviously to line their own pockets, they did not consider the effect it would have on food production. This area is historically a farming community, it was the place where thousands of Londoners used to travel to work in the hop fields, for them it was a holiday as well and for many the only times they got to see the countryside, the hops have mainly gone but the area is still rich in orchards and arable farming. This area is also full of public footpaths, during the pandemic it has been a godsend for the health and wellbeing of local people, it was the countryside next door, easily accessible by foot when travel restrictions were introduced, if the local plan goes ahead this will be lost forever to ourselves our children and grandchildren.

The National Trust, the Woodland Trust and Countryfile are all engaging in planting thousands of new trees, TWBC want to rip out thousands of existing trees, orchards and hedgerows, the very heart of our local countryside, this will make flooding worse and decimate wild life.

The subject of overdevelopment in Kent and the South East has already aired in Parliament by Teresa May saying 'wrong homes are being put in the wrong place', Sir Roger Gale has also criticised the development of agricultural and green belt land in Kent.

The final issue is that if this goes ahead there will be no separation between Paddock Wood and Tonbridge, there will be no greenbelt in between, we will no longer be a rural area, we will be a giant urban sprawl, a giant concrete slab.

If you would like to attach a file in support of your comments, please upload it here. [Malcolm Dorrington- Representation letter.docx \(3\)](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	James Duffin [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	James Duffin [REDACTED]
Comment ID	PSLP_239
Response Date	21/05/21 12:40
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	James Duffin
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Paddock Wood all my life, and I have seen it grow from a village to a town over the years. I love my town, and the green fields surround us, and the smaller villages that are nearby.

However, with all of the current housing developments around us it has highlighted problems with traffic congestion exiting the town. With school traffic, it now takes upward of 45 minutes to travel the six miles between Paddock Wood and Tonbridge for work. When schools are not in session, the same journey takes around 15 minutes. Building all of the extra houses in Paddock Wood and East Capel will make this unmanageable.

5.153 states, "The growth around Paddock Wood will also provide a significant opportunity for investment into Paddock Wood town centre so it can respond to meeting the needs of the additional population it will serve." This was supposed to happen before the three housing developments that are currently under construction were started. We still do not have the second primary school or the improvements to the Badsell Road/Maidstone Road junction.

5.158 & 5.160 both mention the green belt. This is there to stop urban sprawl. If the land at East Capel is built on, this will effectively merge Paddock Wood and Five Oak Green into one urban development. 5.158, 5.163, 5.164 & 5.165 all mention flood plains and flooding. Land to the North of Paddock Wood, and the land at East Capel are effectively flood plains. If these are built on, even with flood mitigation in place, it will still cause a significant flood risk to the existing town of Paddock Wood, plus those settlements further downstream. 5.166 mentions the heritage of the town. We have very little heritage left due to planning being granted for various developments over the years, including the retirement complex that is due to be built soon. Each of those has destroyed historic buildings. We would like to retain what little we have left for future generations to enjoy

5.167 mentions the route of the old Hop Pickers railway line. I was under the impression that this was protected from development? 5.175 states, "All sites are within walking or cycling distance of Paddock Wood railway station." Does this consider bad weather? Traffic on the roads significantly increases when the weather is bad, as people do not want to walk or cycle. 5.174 The justification does not make any sense. TWBC has 20 yards. It seems that over 50% of the allocation is just going to two wards; Paddock Wood and Capel.

5.177 says that the growth here is justified. On what basis? Surely, there are other sites, such as Castle Hill, or brownfield sites around Tunbridge Wells.

5.180 says "...but deficiencies in service provision, mobility, and flooding infrastructure have been identified. Comprehensive strategic development offers an opportunity to address these deficiencies and inject the town centre with new vitality and viability." So why were the current crop of 1000 houses

allowed planning permission? We will struggle to support the residents of those, let alone the other thousands that will move in under this plan.

5.184 "Whilst it is not anticipated that the industrial units at Eldon Way, to the north west of the town Tunbridge Wells Borough Local Plan 141 Pre-Submission Local Plan Regulation 19 Consultationcentre, adjacent to the railway line, will become available over the plan period, if suitable alternative employment premises are identified, residential uses would be supported in principle in this location subject to other policies in the Plan." Eldon Way is built on marshy ground and currently sits on what is essentially a raft. Moving the businesses to elsewhere and trying to build houses on this would be extremely difficult.

5.186 "Growth could positively improve life and opportunities for those living in the town, or those wanting to remain but unable to find a house." The houses need to be affordable by the local population. The three current developments do not have anything in the price range that is affordable for most residents of Paddock Wood.5.185 point 5 "This should include consideration of how the natural and historic environment of the local area is reflected and respected." TWBC have stated repeatedly that we do not have any historic areas and have allowed areas we consider historic to be demolished. The allocation for the new sports hub on the land at East Capel is in the wrong place. It would create extra congestion at an already busy junction. This would be better sited on the land opposite Transfesa Road, and would allow access to the site from Maidstone Road, and also from the A228 via Eastlands Lane, therefor cutting congestion at the junction by the Hop Farm roundabout

The travel plan mentions putting the restricted traffic access back onto Commercial Road, to allow buses only on the lower part. When this scheme was last implemented, it caused problems. There was no clear-cut advice for disabled or elderly residents about access to the parking bays outside of the shops, and it pushed extra traffic out onto the surrounding housing estates (Warrington Road and Green Lane). The lower part of Commercial Road needs to stay as access for all vehicles, with traffic wardens to discourage pavement parking. The travel plan also mentions the railway bridge on Maidstone Road. It states that this is the town's only crossing point for the railway, and proposes to close it to all traffic except busses. This is a truly ridiculous idea. It would cut off the main artery of the town, and force extra traffic out on the Badsell Road/A228 Junction, and the A228/Maidstone Road junction at the Hop Farm.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Jonathan Easteal [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Jonathan Easteal [REDACTED]
Comment ID	PSLP_1727
Response Date	04/06/21 15:17
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Jonathan Easteal
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I do not believe the plan is sound. The volume of new homes planned for Paddock Wood (approx. 4000) is unreasonable and disproportionate. The town is already having substantial home building which is already a lot but is proportionate to the town and the environment. Building a further 4000 homes is not proportionate and will adversely effect the environment . Further valuable green belt land will be lost as a result of building the 4000 homes. I do not believe that this number of homes is at all justified for Paddock Wood and will destroy the surrounding nature. In addition, the infrastructure of the town cannot support it and plans to improve the infrastructure are, I believe, severely wanting. The development would also exacerbate the risk of flooding in the town. I believe planners have an obligation to maintain the character of Paddock Wood and not undermine the quality of life of existing residents. I don't believe these considerations have properly been taken into account.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I believe the only way to make the local plan sound in respect of the planned home building in Paddock Wood is to undertake building on available brown field sites – of which there are a number to the north of the town. Also the number of homes needs to be substantially reduced in order to not adversely effect the green belt, the infrastructure of the town and the quality of life of existing residents.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box.	Not Stated
--	------------

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
--	---

Comment

Consultee	Graham Edwards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Golden Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Graham Edwards [REDACTED]
Comment ID	PSLP_1015
Response Date	03/06/21 08:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graham Edwards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Dear Sir, Madam,

I am a resident of Golden Green and have lived here for 8 years. I have lived in this local area with my wife and 2 children, now grown up, for the last 34 years, so I do know the area well.

I wish to express my opposition to STR/SS 1, the proposed new strategy for Paddock Wood and land east of Capel. I do not feel that the proposals are sound, appropriate, or reasonable to build so many new houses in this area for several reasons.

The community response to the Regulation 18 proposals for both STR/SS 1 and STR/SS 3 were very large, however TWBC seems to have ignored these objections.

The planned 4000+ houses for STR/SS 1 will bring a significant increase in traffic and demands upon the local infrastructure. Interestingly, the closest town main town to this proposed development is Tonbridge and not Tunbridge Wells as the development is on the outskirts to the TWBC area.

I understand that there is a proposal to close part of Maidstone Road (B2160), which runs north of Paddock Wood. This makes no sense, as there are in effect only 4 roads into Paddock Wood. To close the main north access, would divert all traffic via the A228 and then due east along the B2017. This is almost certainly to become a major bottleneck for commuter and emergency services, leading to increased pollution and significantly impacting residents. Additionally, Mascalls Academy school is at the junction of B2017 and the B2160, so to bring even more traffic closer to a major local school, I believe to be a poor and incorrect decision.

I do not believe that due consideration has been applied to the impact that such a large increase in housing will have on the local amenities, or of the huge increase to local traffic. Car use will inevitably increase dramatically and I believe that this could be better managed by siting the increased housing much closer to Tunbridge Wells. This would give greater opportunity to improve the public transport network in their own main town, rather than push all the new housing out to out-lying villages and effectively promote a significant increase in car usage.

I urge you to reject the proposals as they stand.

Best regards Graham Edwards

Question 6

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Significantly reduce the proposed number of houses to be built and remove the proposed closure of the Maidstone Road

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alison Edwards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Alison Edwards [REDACTED]
Comment ID	PSLP_1160
Response Date	03/06/21 21:24
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Alison Edwards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Golden Green for the last 8 years and have lived in the local area for 35 years. I am a local Practice Nurse, working in a local GP surgery, as well as more recently delivering the COVID vaccination programme. This means that I have to frequently travel in all directions across the surrounding area.

I have brought up my 2 children, who attended local schools and we have all attended church and clubs locally for the last 35 years.

In this time, the traffic congestion has definitely increased and the ability to park has also become more difficult. Local GP practices are very busy and getting an appointment takes much longer than it used to and is now frequently several days. As a Practice Nurse in a GP practice myself, I can see that the whole service is under mounting pressure and will soon be overwhelmed.

The main issues with the STR/SS 1 plans and proposals are the significant impact it will have on the local area. The proposed new housing will eliminate 800 acres of greenbelt. This is an area where I love to walk regularly to keep healthy for my mental well-being. Covid restrictions and the lockdowns have taught us to value our countryside more and how important it is to each and everyone of us. As the population grows, it is more important than ever that people have space to roam the countryside locally without having to use their cars. They also need good quality locally produced food which needs agricultural land. The plan if adopted would destroy 100s of acres of agricultural land. We need more of this land not less to support our ever- growing population and for the country to be more self-sufficient, especially in light of Brexit.

The proposed development is also in a high flood risk area (Tudeley) and flood plain (East Capel) which seems madness when the river Medway now floods regularly during the winter months. This water desperately needs somewhere to go. The proposed covering of land will reduce the flood plain capacity and increase the flooding depth by concentrating it into a smaller area. This is then likely to significantly impact other villages further downstream.

At the moment (2021), approximately 2,500 people live in Capel. The proposed development will increase the population to around 13,500. The majority of families will have at least one car and frequently two or more, leading to a significant rise in air pollution and a dramatic affect on the local traffic, especially at rush hour. It seems such a disproportionate increase to add so many dwellings (500% rise), destroying a rural parish, right next to Tonbridge. Tunbridge Wells borough council will receive all the council tax for this, but Tonbridge will have to suffer the increased traffic, car parking, demand on GP Surgeries and schools. There will also be a significant and long-lasting impact of disruption and hassle to the local residents of all surrounding villages during the building phase of this huge number of houses.

I believe that there has been inadequate pursuit of using alternative sites, such as Castle Hill, Blantyre and brown field sites within the TWBC area, especially more local to Tunbridge wells town.

I strongly oppose this plan.

Alison Edwards

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anja Ennis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anja Ennis [REDACTED]
Comment ID	PSLP_1059
Response Date	03/06/21 12:15
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Mrs Anja Ennis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

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I have lived in Paddock Wood for 40 years. It used to be a lovely town. The fields and countryside were stunning and it felt very rural; now the entire town is a mass of concrete. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy. As there is no local market, the houses are being marketed in Hong Kong as Buy To Let.

As the town expands the flooding will only get worse as trees, hedges and drainage ditches are removed or concreted over. Traffic is terrible, particularly during rush hours and school drop-off/collection times. East Capel is a small village; it doesn't have the infrastructure to be able to take on anything like this size of over-development. It will ruin the current village.

It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
--	---

Comment

Consultee	Duncan Ennis [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Duncan Ennis [REDACTED]
Comment ID	PSLP_1077
Response Date	03/06/21 13:18
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mr Duncan Ennis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived with my wife in Paddock Wood for 7 years and I grew up in Matfield. It used to be a lovely town. The fields and countryside locally were very rural and green; now the entire town is a mass of concrete with more developments beginning every day. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy.

As the town expands the current flooding will only get worse as trees, hedges and drainage ditches are removed or replaced by housing estates. Traffic is terrible, particularly during peak hours and school drop-off/collection times. East Capel is a small village; it doesn't have the schools, shops, doctors or road infrastructure to be able to take on anything like this size of over-development. It will ruin the current village. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anne Etherington Rich [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anne Etherington Rich [REDACTED]
Comment ID	PSLP_57
Response Date	23/04/21 10:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Anne Etherington Rich
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- ☐ It is not effective
- ☐ It is not justified
- ☐ It is not consistent with national policy

Question 5

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This land is Green Belt land and should only be built upon if an “exceptional circumstance” exists. TWBC’s own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan’s aims without using the Green Belt land at East Capel. The comment above about coalescence and the creation of a conurbation from Paddock Wood right across to Tonbridge is very relevant here, as is the land’s use as a flood plain. Building here, even with flood risk mitigation and “betterment” could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the impact of climate change.

I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- ☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- ☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Maggie Fenton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Maggie Fenton [REDACTED]
Comment ID	PSLP_1934
Response Date	04/06/21 13:51
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Maggie Fenton
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR/SS 1, STR/SS 3 and STR/CA 1 – see Comment Numbers PSLP_1934, PSLP_1935 and PSLP_1937]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The PSLP as it stands is likely to contravene Protocol 1, Article 1 of the Human Rights Act (The Protection of Property) and therefore is not legally compliant. Everyone has the right to peaceful enjoyment of their property. A Planning authority can only breach this fundamental right if it is in the public interest. Furthermore since the case of Britton vs SoS the courts concluded that the protection of the countryside falls within the interest of Article 8 (Respect for private and family life) and includes BOTH home and surroundings. There has to be a fair balance between the general interest and the rights of individual property owners and businesses. It may be necessary with some planning applications to compulsory purchase or to allow a certain amount of traffic noise to intrude a personal home but there has to be a fair balance. There must be objective and reasonable justification. The LA should try to ensure that policies and decisions do not interfere with the peaceful enjoyment of possessions. Human rights are clearly defined in law and Planning Authorities are obliged to treat everyone with dignity, respect and fairness. Proportionality is the key test.

There is nothing proportionate regarding TWBC allocating over 50% of its development on a parish which contains only 2% of the population of the borough. The rights of property owners and the rights of the community have to be balanced. There is NO benefit to this area, in these plans, for the existing community. The views of the community have been ignored from start to finish.

- . The whole of Capel will suffer from 15-20 years of severe disruption if this plan proceeds. That alone is likely to deter local businesses.
- . Capel will be significantly impacted by thousands of cars, traffic noise and pollution and the clear danger to public safety in a parish that already has severe speeding issues.
- . Capel will lose its precious countryside
- . The community has already suffered from severe stress and anxiety during the last two years with the threat of CPO's, and for some the impact of being suddenly being in the centre of a new town, for others loss of identity as they are threatened with being moved into an entirely different parish.

The community throughout Capel is strong and united. Five Oak Green might not be the exemplar of a quaint arcadian village but it is a close, tight and friendly community, which is more important than beautiful houses set in a sterile environment. People make places not houses. We are not Nimby's in Capel and are very aware of the need for truly affordable houses for our younger generation, suitable housing for our elderly and a share of development to bring economic prosperity.

BUT we shouldn't be the easy target for TWBC because we have a small population and they thought we wouldn't shout long and hard! Sadly they have ignored the shouting and objections at Reg. 18 and

rewarded us with another few hundred houses. Tudeley in particular was the easy option and deflected TWBC from its original course of a more equitable distribution of development amongst the rural villages. Capel has not been treated with dignity and respect throughout this whole process and a huge majority of the community will not be able to peacefully enjoy their properties nor the countryside surrounding them.

Due to the lack of objectivity, lack of proportionality, and lack of any community benefit the PSLP is unjustified, not positively prepared and therefore unsound.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

TWBC need to objectively reassess all sites in the borough, work on their brown field register which is pitiful and find a more proportionate solution to the housing need.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Because this has consumed my life for the last three years!

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Jeff Fenton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Jeff Fenton [REDACTED]
Comment ID	PSLP_915
Response Date	01/06/21 13:16
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Jeff Fenton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Paragraph Number 5.189

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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The suggestion here is that the southern section of Colts Hill bypass will be held back for a number of years whilst KCC/TWBC assess the need following the completion of the Five Oak Green bypass and northern section of A228 Colts Hill bypass. This can only be described as rather lacking as the works required to build the northern section of A228 and junctions within it for Alders Road and Crittenden Road will all require substantial funding and these cannot be ignored by not building the southern section of the A228 bypass as the disruption to build this in later would prove unworkable due to the level of traffic using the new road.

It appears that KCC and TWBC do not agree what the correct solution is and this really is unacceptable and makes the whole A228 Colts Hill bypass project Unsound.

We also note there is no mention of road safety whilst all these works are ongoing or the health of those living on top of the A228 & B2017.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We would suggest that the whole issue regarding Colts Hill bypass and Five Oak Green bypass be revisited urgently and a more definitive solution be found that includes protection of the currently built environment and its residents.

Five Oak Green appears as a blot on TWBC's landscape and the residents are sick of hearing all the promises about bypasses and traffic calming. We daily see HGVs thundering through our village (53mph recorded by our local Speedwatch team) with narrow pavements, no controlled crossing points and no help to reduce the traffic speeds from KCC or TWBC. We are not even allowed traffic islands to cross the road as the road is too narrow.

HGVs mount the pavement by Capel Primary school at drop off/pick up times as they cannot pass the string of parked cars belonging to parents.

Any solutions agreed by KCC & TWBC should be properly discussed with full Capel Parish Council and other directly interested parties. To date, the representations to TWBC Joint Transportation Board have fallen on deaf ears.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As lead for Capel Road Safety Campaign and Co-ordinator for Kent Police Community Speedwatch, I have a good and realistic knowledge of highways in the area and the many issues that the PSLP has highlighted or missed. It is important that proper debate takes place.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Megan Forster [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Megan Forster [REDACTED]
Comment ID	PSLP_668
Response Date	02/06/21 10:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Megan Forster
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Five Oak Green for nineteen years, also working from home.

I live in the lowest part of the village and subsequently have a risk of flooding from ground water, surface water and sewerage as the drainage systems are put under stress by substantial and increasing rainfall. Storm water combines with the foul water system with a resulting hydraulic overload. Twice this year already [February and May] we have had drains and sewers overflowing and toilets unusable for days at a time. Having liquid sewerage outside our doors and across our gardens is not pleasant. The whole village has seen increasing and unprecedented amounts of flooding in the last few years and the with climate change issue it seems likely to exacerbate.

All our foul water goes to the Paddock Wood treatment plant which is antiquated, difficult to repair and frequently fails as does the equally antiquated pipework. Paddock Wood has multiple ongoing developments that were struggling to connect to the sewerage infrastructure even before hundreds more homes were given planning approval. I know Southern Water have been forced [with help of MP Greg Clarke] into promising a new pumping station which will increase the capacity to a degree [and only to a degree] but I am concerned about their ability to fulfil this promise, given their track record of failings and fines amounting to many millions of pounds. The plan for this new facility - it's cost, location and start date seem illusive despite the latest new housing developemnt of 300 houses nearing completion and more on the way. To put so much more pressure on an already failing infrastructure is illogical. It is a Southern Water general policy to only plan for five years ahead - how can this be realistic ? How can it comply with government and climate change guidelines ?

Added to this - The Capel East area is a recognised flood risk zone. However much flood attenuaton is built in to the plan with good intentions by the developers how will this stop individuals, in time, adding extensions, paving over gardens and incrementally adding to the run off. Natural flood meadows cannot be replaced by artificial measures. It is lost as vital flood management asset and puts more pressure on the Envirement Agency to provide even more flood defenses.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Mrs J R Fry, Mr C D Fry, and Mr & Mrs T J Fry
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs J R Fry, Mr C D Fry, and Mr & Mrs T J Fry [REDACTED] [REDACTED]
Comment ID	PSLP_47
Response Date	26/03/21 13:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Letter
Version	0.2
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mrs J R Fry, Mr C D Fry, and Mr & Mrs T J Fry
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I am writing on behalf of all concerned land owners at Lydd Farm in response to the Capel Bypass Road Route proposal, which was brought to our attention recently through social media posts by a local group. To date, we have not been contacted by anyone from TWBC or any other relevant authority in any official capacity to inform us of these plans.

If the proposal is accurate, it would mean that a new road could potentially cut right through our land, dividing the farmland and causing significant-and unnecessary-disruption and destruction, not only to the local wildlife but also to us and the other neighbouring properties.

We vehemently object to this plan and will do all in our power to oppose it. We are not willing to sell any land if the bypass route cuts through or near our property, and we do not support it in any way. The upcoming Tudeley and Capel developments-which have seemingly passed into the next stage of planning despite huge local opposition and without proper consideration of the more viable alternatives-have already dealt us and other local residents a huge blow in terms of decimating our local environment and potentially causing massive disruption and upheaval, so to hear this news on top was saddening and frustrating.

Please confirm that you will not be routing a new road through our land but, should you have any information or other response, we would be grateful if you could send it to the above address.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_143

Comment

Agent	Mr Jonathan Buckwell ()
Email Address	
Company / Organisation	DHA Planning Ltd
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Consultee	()
Company / Organisation	Gallagher Properties Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Gallagher Properties Ltd ()
Comment ID	PSLP_2061
Response Date	02/06/21 17:52
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.9
Files	DHA Planning for Gallagher Properties - full representation and appendix.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Gallagher Properties Ltd
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: the full representation attached has been divided into Policy STR/SS1 (PSLP_2061), Vision and Strategic Objectives (PSLP_2062), Policy STR1 (PSLP_2063), Policy STR4 (PSLP_2065) and Development Management Policies (PSLP_2075)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Gallagher Properties Ltd (hereafter referred to as Gallagher) in respect of the Tunbridge Wells Borough Council Regulation 19 Pre-Submission Local Plan (PSLP) consultation.

1.1.2 These representations relate to land at Swatlands Farm, Lucks Lane that forms part of the employment allocations proposed for the expansion of Paddock Wood.

1.1.3 Based on the current national and local planning context, we consider this the site to be suitable for development.

1.2 The Site

1.2.1 Our client is promoting employment development at Swatlands Farm, Lucks Lane, which formed site 347 of the Strategic Housing and Employment Land Availability Appraisal (SHELAA). The site location is shown on the plan overleaf. *[TWBC: see full representation attached]*

1.2.2 The site is located to the south-east of Maidstone Road and south of Lucks Lane. It lies adjacent to, but outside, the defined Limits to Built Development (LBD) boundary of Paddock Wood in the adopted Local Plan, but within the proposed Paddock Wood strategic development area and within the proposed LBD in the PSLP.

1.2.3 The site comprises an undeveloped parcel of agricultural land. It has a largely grassed surfaced with boundaries are marked by hedgerows and trees. A small wooded area lies to the west, adjacent to Maidstone Road, and a central tree/hedge line which partially divides the site. There is also a water course running along the rear boundary of the site and a small stream that runs across part of the site from Lucks Lane.

1.2.4 Gallaghers are proposing to develop the site for employment development. It is currently anticipated that a range of size and types of employment units could be provided on the site, providing up to 18,500 sqm of employment floorspace within up to seven buildings.

1.2.5 The Council's SHELAA site assessment confirms that the site is suitable for economic uses, and is available and deliverable. It is therefore identified as being suitable for an allocation in the Local Plan as a logical extension to a key employment area.

[TWBC: for site location plan see full representation attached]

1.2.6 The site is deliverable in the short term and therefore represents an excellent opportunity to deliver meaningful new employment, and by providing the type of units for which there is currently the highest level of demand. It is important that, whilst constraints clearly need to be respected, the Local Plan allows the best use to be made of what is a key employment growth opportunity.

1.3 Local Plan Background

1.3.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.3.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3.3 This submission comments on the plan having regard to these tests of soundness as well as wider legal compliance.

1.4 Legal Compliance

1.4.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.4.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.4.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.5 Assessment of Soundness

1.5.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.5.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010,

and the Site Allocations Local Plan 2016. 1.5.3 This representation comments on the following elements of the plan:

- Vision and Strategic Objectives;• Development Strategy and Strategic Policies;
- Place Shaping Policies; and• Development Management Policies.

Place Shaping Policies

1.5.14 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

Policy STR/PW1

1.5.15 Policy STR/PW1 sets the Strategy for Paddock Wood and states that approximately 3,490-3,590 dwellings and accompanying infrastructure will be delivered via the planned extension to Paddock Wood.

1.5.16 We have **NO OBJECTION** to Policy STR/PW1.

Policy STR/SS1

1.5.17 Policy STR/SS1 sets the detailed strategy and states, amongst other things:

[TWBC: PSLP Policy STR/SS1 duplicated here - see full representation attached]

[TWBC: PSLP Policy Extract of proposed proposal map for Paddock Wood duplicated here - see full representation attached]

Comments in relation to Swatlands Farm

1.5.18 Gallaghers SUPPORT the proposals for employment development at Swatlands Farm, which falls within the northern parcel (edged red) as shown on Map 27. Swatlands Farm represents the southern part of site PW1_5 as identified in the Strategic Sites Masterplanning and Infrastructure Main Report.

1.5.19 In particular, my client SUPPORTS the inclusion of Swatlands Farm within the proposed Policy STR/SS1 allocation and within the Provisional Limits to Built Development as shown on the Policies Map.

1.5.20 They confirm that in relation to this site, it is deliverable over the plan period. My client's proposals will help to deliver additional high quality employment in the manner envisaged, including a mix of employment types and sizes in order to support the balanced economic and employment growth of Paddock Wood.

1.5.21 My client's land is capable of being developed in accordance with the principles set out in the PSLP. This land can be developed to provide additional high quality employment provision, and is easily accessed on foot from the town centre and railway station via existing footpaths.

1.5.22 The Strategic Sites Masterplanning and Infrastructure Main Report paragraph 4.38 encourages opportunities for smaller companies to be attracted to Paddock Wood to promote the balanced growth of the town, as well as providing opportunities for existing companies to expand and relocate. Gallaghers have a track record of providing a wide range of employment uses, and have previously constructed units Wrotham (Tonbridge & Malling). Further information on this development is included as Appendix 1.

1.5.23 Whilst viability work has been undertaken in relation to the residential parcels at Paddock Wood, it is not clear whether a similar exercise has been undertaken in relation to the employment development. Planning policies should take account of the fact that there are a number of landscape, flood risk, biodiversity and other constraints on these sites and that development requirements, for example sustainability requirements such as those set out in Policy EN3, need to be reasonably balanced in order to ensure that development can sensibly proceed.

1.5.24 Whilst we support the overall aims and objectives for the Swatlands Farm site as set out in the Strategic Sites Masterplanning and Infrastructure Main Report, we OBJECT to the proposal for Lucks Lane to be converted in its entirety to a pedestrian and cycle route, with a new parallel access road

to be provided to the south. Whilst we take no issue with the general concept of Lucks Lane being used primarily as a pedestrian and cycle route, the existing Lucks Lane/Maidstone Road junction should be retained as the main access point for the Swatlands Farm site. This is because:

- It is in the safest position to access the site from Maidstone Road taking into account visibility splay requirements;
- Driving a new access through to Maidstone Road would result in the unnecessary loss of several significant, well-established trees; and
- The parallel access road concept would further reduce the amount of land available for development within the Swatlands Farm parcel, especially when taking into account other constraints, and could render the scheme unviable.

1.5.25 As noted previously, there are already flood risk and biodiversity constraints on the site, which need to be respected. In order to make the best use of this key employment opportunity, it is essential that the Local Plan does not result in any further unnecessary reduction in net developable land, for example, by requiring the parallel access road concept.

1.5.26 It is also noted that the widening of Lucks Lane is identified as a potential mitigation measure in the Sweco Transport Assessment which underpins the Draft Local Plan, which supports our stance as set out above.

1.5.27 This objection could be remedied by amending the proposed masterplan, and making the equivalent changes to Maps 28 and 29 in the PSLP.

1.5.28 Furthermore, whilst the benefits of Design Review are recognised, and we do not object to the use of Design Review Panels being encouraged through policy, we do question whether their input at both the pre-application and post-submission stages for all applications within the SS1 masterplan area should be mandatory in all cases, regardless of the scale and nature of the proposal – which appears to be the case as Policy STR/SS1(5) is currently worded.

1.6 Summary and Conclusions

1.6.1 In summary, this representation has been prepared on behalf of Gallagher Properties in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.6.2 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, including employment development at Swatlands Farm.

1.6.3 We do however object to the detailed wording of certain aspects of Policy STR/SS1 as set out above, although the general principles are supported. We also have concerns about some of the development management policies as set out above, which we are concerned unnecessarily replicate the NPPF, whilst providing detail which could have the unwanted side effect of unnecessarily limiting and frustrating beneficial development.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_82

Comment

Agent	Chris Frost [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Future Planning and Development
Address	[REDACTED] London [REDACTED]
Consultee	Mr Mateusz Debczak [REDACTED]
Company / Organisation	Gold Property Development Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Gold Property Development Ltd [REDACTED] [REDACTED]
Comment ID	PSLP_1647
Response Date	04/06/21 10:33
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	PSLP_1555_Future_Planning
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Gold Property Development Ltd
Question 2	
Agent's Name and Organisation (if applicable)	Future Planning & Development Ltd
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR 1, STR/SS 1, STR/SS 3 and PSTR/LA 1 – see Comment Numbers PSLP_1555, PSLP_1647, PSLP_1648 and PSLP_1649. Attachments uploaded as supporting information]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Future Planning and Development act on behalf of our client, Gold Property Developments Ltd, in respect of their site, Lamberhurst Winery, Lamberhurst Down, Lamberhurst. This site is being promoted for residential development; it being sustainably located on the edge of the village of Lamberhurst.

The proposed submission version of the Local Plan identifies the requirement for additional land for housing in Policy STR1 and sets out a strategy for meeting this need. The proposed approach principally relies upon the allocation of large scale housing sites arising from the strategic urban expansion of Paddock Wood and the proposed Tudeley Village new settlement. Other than Tunbridge Wells, the Plan proposes only limited housing allocations for the other centres in the Borough, as set out in Table 4 - Distribution of housing allocations.

While it is acknowledged that paragraph 72 of the NPPF supports the new settlements and major urban extensions in order to achieve the supply of a large number of new homes, this must be brought forward in tandem with smaller scale development that is delivered more flexibly and quickly. It is our view that the Council's proposed approach to delivering the homes needed by the Borough is

fundamentally unsound, as it is entirely reliant on a small number of volume housebuilders to bring forward development at an unrealistic delivery rate. By contrast, a more even distribution of allocated sites across the Borough, which supports and enhances existing communities, would ensure a more successful and continuous delivery of homes across the Borough and throughout the Plan period. Small and medium sized sites, usually brought forward by SME developers, rather than volume housebuilders, should play an important role in delivering housing within the Borough, but the proposed delivery strategy promotes the opposite of this.

We therefore submit that Policies STR/SS1 and STR/SS3 are unsound. These policies cannot be amended to be made sound, so long as the strategy of the proposed Plan is to achieve the required number of additional homes through large-scale development in just two locations, as opposed to a more proportionate expansion of existing sustainable settlements across the Borough. It is not that one or other of these two sites should not be brought forward for development, but that they must be balanced by the provision of more housing on smaller sites in other settlements.

Policy PSTR/LA 1 sets out a strategy for Lamberhurst parish. Point 2 of this policy proposes to build approximately 25-30 new dwellings on land at Spray Hill, which is expanded at Policy AL/LA 1. We have no objection to the allocation of this site for housing and agree that the provision of additional housing in Lamberhurst Down is a sensible approach to providing for housing need in a sustainable location. However, we consider PSTR/LA 1 to be unsound insofar as it follows Policy STR 1 and fails to deliver enough housing across the Borough, for the reasons set out above.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to deliver the homes required by the Local Plan consideration should be given to the allocation of Lamberhurst Winery (SHELAA site reference 423) for housing. This site is being brought forward by a SME developer and is proposed to be delivered as soon as possible following the grant of planning permission. Officers have confirmed that the development of part of this site for affordable housing for local people is considered acceptable in principle and a planning application for this element is to be submitted imminently. This could serve as a first phase for the wider development of the site.

Policy PSTR/LA 1 should be modified to include the allocation of around 125 dwellings at Lamberhurst Winery (SHELAA site reference 423) and an additional allocation policy should be included (AL/LA 2) for the allocation of this site.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to clearly set out the case for an appropriate approach to housing allocations

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	pianodan Grimwood [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	pianodan Grimwood [REDACTED]
Comment ID	PSLP_857
Response Date	03/06/21 11:48
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Daniel Grimwood
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS1

STR/SS2

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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A lot of the building is on greenbelt, but government policy is to preserve greenbelt.

Infrastructure First policy has not been implemented.

The scale of development is hugely inconsistent with the rest of the borough.

Building on floodplains is potentially problematic.

Public consultation has been ineffective.

Question 6

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The pandemic is changing our world. The speed of building seems precipitous when we don't know how many existing buildings will be left vacant when the world returns to normal. Brown field developments should be more fully exploited before the countryside is irrevocably damaged.

Infrastructure First should be more than words. Paddock Wood already struggles in some areas and the new builds will put (are already putting) massive pressure on our already stretched facilities. I understand the stamenet of

We are a small percentage of the borough but we are receiving a huge percentage of the borough's new builds. A wider distribution of building around the borough would be fairer. I am aware that Tonbridge and Malling delayed signing a Statement of Common Ground because of strains TWBC's gigantic developments would place on their services - I understand an uneasy agreement has been reached.

Paddock Wood floods. It would be better if sites for development be selected as *they are*, and not based on hypothetical future scenarios. If sites for development are selected based on future

projections, could that not mean that development can happen anywhere, regardless of flood risk and attached insurance issues? You should be mindful of the damage storms Ciara and Dennis inflicted on Wales after planning was granted in flood risk areas between 2016 and 2019. Residents there are still paying the price of that policy, which Dr Doug Parr, chief scientist at Greenpeace UK described as "literally planning for disaster".

As I write, I am acutely aware that my concerns are based on the research of myself and other residents of Paddock Wood - ergo, public consultation - what public consultation? We are in the midst of a global pandemic; would it not be better to put the brakes on until normal social interaction is possible again?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I would like Paddock Wood residents to be fully aware of, and involved in any changes made to the future of Paddock Wood

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

I grew up in Paddock Wood and have lived here for many years. For quite some time - long before the pandemic hit - it has been difficult to get doctor appointments. Residents are concerned this problem will get very much worse with a massive influx of new residents. In the booklet delivered by the Conservative Party just before the local elections, they make an effusive commitment to Infrastructure First: "When development does happen, our INFRASTRUCTURE FIRST policy means that schools, GP surgeries, open spaces and transport links are planned BEFORE housing". Does Paddock Wood have a new school? Has the GP surgery been expanded? Have we got more open space? Has our transport access been improved? Perhaps these things have been planned, but if they are merely going to catch up with the voracious pace of development here, that just isn't good enough and it is a very long way away from what has been promised. It is symbolised by the fact that a regeneration of the town centre was expected, but what has been delivered so far is a funeral director and a retirement home!

Several times I have spoken with people in the town, and a surprising number of people are unaware of the sheer scale of the developments, and unaware that the town will be a building site for the next almost two decades (I was told this by Steve Baughen himself). Many people simply don't know. That is a failure of public consultation. Don't believe me? Walk around Paddock Wood, show them exactly how many fields are about to be built over, and see how many people know. Many who do know tend to shrug and say something like "they'll do what they want, nobody can do anything about it". This isn't apathy, this is grim acceptance that they won't be listened to. Asthmatics like myself are complaining that our symptoms are worse since the building started, parents are concerned about the volume of traffic near the school, people should be aware that this is how it will be for the next almost two decades if the plans all go ahead.

I refer back to what I wrote in the previous answer, that sites should be selected as they exist rather

than based on future hypotheticals. My own home has come within a few millimetres of flooding on some occasions since I have lived here. All it takes is for your house to flood once for your life to be turned upside down. We are all worried about this. I have read the NPPF para 148 onwards, and what is set to happen in Paddock Wood seems at odds with what the document sets out with - I'm thinking in particular of para 149: "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures". I would also add that the building work seems precipitous at an uncertain time when we do not know what post-pandemic world we will be returning to; will there be changes of building usage after offices are left empty? Will commuter patterns be changed forever?

As I write this really incredibly complicated form, being completely unsure whether I'm putting the right bits in the right boxes, I am wondering how committed the powers that be are to transparency and public consultation. It seems designed to confuse and intimidate, and I am absolutely certain that a large number of concerned residents won't have made it this far. I feel strongly that a real, robust public engagement is needed. This clearly won't be possible until normal social interactions are allowed again.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_10

Comment

Consultee	Charles Harrison [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Charles Harrison [REDACTED]
Comment ID	PSLP_207
Response Date	19/05/21 14:24
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	SAVE CAPEL SUBMISSION.pdf PSLP_207_C Harrison_Save Capel_SI_Redacted.pdf
Question 1	
Respondent's Name and/or Organisation	Charles Harrison
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 For Paddock Wood including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a retired Australian civil engineer now residing in Tonbridge. I have viewed with a professional interest this proposal for the TBBC Planning Scheme with a particular interest in the locality adjoining where I live.

I am concerned that Council has elected to ignore in the main, its own Principles and Policies as well as National Policies, in an attempt to achieve an outcome required by the National Government. These policies referenced in my submission attached.

I have also been discussing the draft plan with local people who will be more directly impacted than myself, although the increase in traffic density that Tonbridge will inherit will impact on me personally. I am disturbed that council has failed to address the legitimate concerns of these citizens.

I am therefore of the opinion that the Local Plan is not sound and Council has not complied with its Duty to Cooperate.

I am particularly concerned that Council has ignored the National Policy with regard to preserving the Green Belt. In light of the current international momentum towards responding to climate change, I consider Council's attitude towards the green belt in this plan to be not in the National Interest.

Comprising on the Green Belt policy sets a dangerous precedent for future decisions. This is clearly not in the interests of the Local Community and National Policy, and must be avoided at all costs.

Question 6

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Modifications to the plan should include.

- 1 Preserving the Green Belt to stay consistent with National Policy.
- 2 Decreasing the proposed housing density to a level that will not impact the local amenity so dramatically.
- 3 Decreasing the population density will allow Engineers more freedom to manage stormwater run off without the risk of flood damage to current or future residents.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

I understand that TWBC has to update its planning scheme and needs to identify potential areas for sustainable housing development.
 In this particular case I am of the opinion that Council is grasping at any solution to resolve the issue. By this I mean it is prepared to surrender all its previously set values on the Green Belt, Stormwater Flooding, and Amenity in order to achieve an outcome - any outcome.
 The proposal clearly fits into the "overdeveloped" basket and should be reconsidered.
 It is conceivable that a lesser density development could fit well in this area and this aspect should be encouraged, with the cooperation of the Local Community.

If you would like to attach a file in support of your comments, please upload it here. SAVE CAPEL SUBMISSION.pdf

If you would like to attach a file in support of your comments, please upload it here. PSLP_207_C Harrison Save Capel SI Redacted.pdf

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Charles Harrison

■
TONBRIDGE
TN9 ■

19 May 2021
The Planning Inspector
TWBC Draft Local Plan

I make this submission on the above Draft Local Plan for your consideration when considering its merits.

- 1 The proposal would constitute inappropriate development within the Metropolitan Green Belt, which by definition is harmful to its openness. The proposal is thus contrary to Policy MGB1 of the Tunbridge Wells Borough Local Plan 2006, Core Policy of the Tunbridge Wells Borough Core Strategy 2010, and the National Planning Policy Framework 2018. There is insufficient evidence of the necessary 'very special circumstances' to overcome this harm.
- 2 The proposal, by virtue of creating new roads and buildings with associated domestic development, requires works to alter the land levels. The potential additional impacts from further parking and works would have more than a minimal impact on the landscape character of the locality. It would not conserve and enhance the rural landscape, nor would it protect the countryside for its own sake, nor preserve the interrelationship between the natural and built features of the landscape.
- 3 Further the overall impact is harmful to the rural character of the area. It would thus be contrary to saved Policies LBD1, EN1 and EN25 of the Tunbridge Wells Borough Local Plan 2006, Core Policies 4, 5, and 14 of the Tunbridge Wells Borough Core Strategy Development Plan Document 2010, the National Planning Policy Framework 2018, and the Planning Practice Guidance.
- 4 It has not been demonstrated that the occupiers of the future development would not be at risk from flooding or that the development would not increase flood risk elsewhere. Therefore, the development is likely to result in a risk to human life and property from flooding. The proposal is contrary to policies EN18 of the Tunbridge Wells Borough Local Plan 2006 and Core Policy 5 of the Tunbridge Wells Borough Core Strategy 2010, guidance in the National Planning Policy Framework 2018 and the Planning Practice Guidance.

Yours Faithfully

■

Charles Harrison

Comment

Agent	Jacqueline Hayward. Gan [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock wood Kent [REDACTED]
Consultee	Jacqueline Hayward Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Jacqueline Hayward Gant ([REDACTED])
Comment ID	PSLP_1259
Response Date	04/06/21 12:33
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jacqueline Hayward Gant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS1

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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I'm agreeable to some new housing but to start the Mascall's site and Church Road Site at the same time as Green Lane site, the Hop Pocket old pub site and lose the orchards and fields down to the old Elm Tree pub. The site of the fish and chip shop on Maidstone Road, the development on the site of the old police station, the corner detached house in Church Road are all being made into several properties. Every space with fields, orchards and the oxygen we get from the trees are being destroyed. They cut down the old oak trees on church road and hacked through the ancient hedgerows before the ecologist was present. I'm sure she was only present as several of us demanded to know why they were destroying habitats with foxes, owls, rabbits and badgers and bird life including 2 small egrets that live near the Church Lane site.

No infrastructure pre builds, no school, no extra GP practices, no fire station ready as it is a retained station and then no police station.

The train station car park is always full pre building works. The trains are full by the time they get to Paddock Wood so how will the thousands of new people in the new builds get to work on the shortened train service, also they took away the trolley service on the trains.

The building of the retirement buildings behind Barsley's has meant another car park taken away. We have already lost the Barclays Bank and the HSBC Bank in the small high street/ Commercial Road.

The bus service is extremely irregular and very expensive.

They also want to build on the Memorial Park again concreting again for a car park and leaving millions of pounds in debts payable over a huge amount of years.

Why are they placing out of borough, London borough social housing in the Green Lane site when the have approximately 1000 people on the social housing list?

The fields that are being built on had orchards which soaked up excess water after heavy rain and also flooded parts of Paddock Wood pre new builds. Now the fields and orchard are gone the water table and Earth had flooded and they are building these houses on flood zones.

The idea of keeping the country green is a contradiction of cutting down everything on the green spaces and fields, approx it's possible that a paddock wood may have 3000/4000 more cars on the roads making it dangerous for children and adults with asthma, copd, and other lung conditions causing increased harm when the country is meant to be going green. The bottle neck of the Badsall Road housing is opposite a school with over 1200 pupils all walking to school and breathing in the additional car fumes, the babies and toddlers in prams and pushchairs level to the exhaust pipes.

I moved to Paddock Wood 17 years ago for its green spaces and small primary school and later the larger school.

I'm disgusted by the lack of accountability and decision making by the current conservative councillors voting for the developments when they are meant to be working with the local community who do not want this huge amount of housing placed in Paddock Wood and not spread out over Tunbridge Wells.

Why build over 50 percent of the housing in Paddock Wood and even more housing in Capel?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Emma Hewage [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Emma Hewage [REDACTED]
Comment ID	PSLP_1362
Response Date	04/06/21 16:56
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Emma Hewage
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east CapelPolicy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I am a resident of neighbouring Tonbridge & Malling and have lived in north Tonbridge for the last seven years. During this time I have gotten to know the areas that will be impacted by these policies well and appreciate their immense natural beauty and biodiversity as well as understanding some of the challenges that are already present: namely frequent and severe winter flooding as well as rat-running along small, windy country lanes. I have read arguments that much of the land is agricultural, heavily sprayed and therefore does not support wildlife, but this isn't true. The many trees in the fruit orchards are home to large numbers of overwintering redlist birds, the summer arable fields are frequented by significant numbers of nesting skylarks and the Medway Valley is an incredible wildlife corridor, which is enhanced by adjacent lakes created by past quarrying, ancient woodland (laden with wildflowers such as English bluebells, wood anemones) and hedgerows.

I believe the proposed draft plan is unsound on many levels and am most concerned by the loss of greenbelt / productive farmland, the adverse impact on the AONB, increased traffic and knockon effects on neighbouring Tonbridge. The impact of several thousand more cars commuting to and from Tonbridge's schools and to the railway station should not be underestimated. Already in the 7 years since I've lived here the time to drive along Hadlow Road to Tonbridge Station / schools has increased from 6 mins to 20 mins or more during the morning peak. This is pre-pandemic, but seeing as we don't yet know the long-term impact to working patterns I will stick to this as my frame of reference and without factoring in the impact of Tonbridge's own local plan - which will add many more houses to the town.

It is also my belief that this proposed development will do nothing to address the UK's housing crisis, it will merely create a new dormitory settlement that locks families into using their cars and to long commutes to London to generate the level of income which will be needed to afford mortgage payments on the types of homes which will be built. It will remove valuable agricultural land at a time when it's likely that food insecurity will increase and pave over more of our irreplaceable green space.

I think the proposed development is an opportunistic, ill-considered, lazy plan which TWBC have grasped onto because of its convenience, without rigorously and properly investigating alternatives which would be better served by existing infrastructure.

Building on this scale here will deprive everyone of immensely valuable natural assets and I do not believe the plan has been developed with appropriate input from local people. Neither do I believe that it is based on current figures of housing need. My opinion is that TWBC assumes everyone hates development, so they might as well pick one almighty fight in one place, then battle lots of communities over several 500 home developments around existing towns and villages. But this means they're not really interested in consultation. It's been presented as a fait accompli with anyone who objects portrayed as a NIMBY or anti-development. I am neither of these things.

People need good quality, affordable homes and they need clean air, food, and a healthy ecosystem. We need to stop making this binary and instead use the constraints of limited space and incomes to come up with truly innovative solutions to the UK's housing crisis, not just continue building housing

estates on green fields because it's easy - we've been doing this for decades and the evidence is that it's not the right solution.

Returning to the theme of consultation, it is my view that the exercise conducted in summer 2020 by the Hadlow Group was highly disingenuous. I registered, but declined to complete the survey as, having experience of marketing and research projects, I felt the survey was deliberately set up to create an illusion of favourable support from the local community for the options presented.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

This is utter nonsense. Building on this scale on pristine, unspoiled greenbelt can not possibly be construed as in any way sustainable. It is entirely at odds with the climate crisis and I believe it's irresponsible.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Rosemarie Hicken [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Rosemarie Hicken [REDACTED]
Comment ID	PSLP_1251
Response Date	04/06/21 12:10
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Rosemarie Hicken
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

These comments apply to both STR/SS1 and STR/SS3 but have been submitted separately to ensure they are applied to both.

My initial comment is to express my disgust at the cavalier attitude displayed by TWBC to the residents of Capel and the surrounding area by utterly ignoring the overwhelming 97% opposition to the plan at Reg18 stage. So much for democracy and listening to the concerns of local people. TWBC is seeking to force Capel Ward - one out of 20 in the Borough, to take 51% of the housing target where the need for this amount of housing in the area has not been demonstrated.

The development in East Capel is part of the supersizing of Paddock Wood but this allocation is entirely on a flood plain.

With reference to the Green Belt, the whole point of this was to prevent urban sprawl but this plan is designed to drive a coach and horses through that. The extension of Paddock Wood in Capel Parish will see development adjacent to the A228. The B2017 from the roundabout to Five Oak Green contains ribbon development so the new development will cause coalescence of what were previously 2 separate built areas, exactly what the Green Belt was designed to avoid. There is no evidence of NEED for housing on this scale in this area. On March 3rd 2021 the Prime Minister answered a question from Mike Wood, Conservative MP for Dudley South regarding development and the Green Belt to which he replied "Indeed, Mr Speaker, we will protect our green belt, our vital green belt, and which constitutes, I think, 12.4% of our land, but we can build our homes, as my Right Honourable friend rightly suggests, 300,000 of them on brownfield sites across the country". As far as I can see, TWBC has not demonstrated that the exceptional circumstances required to justify development of the Green Belt exist. TWBC are blighting this part of the borough by dumping 50% of their housing target in one ward, ignoring the brownfield sites which are available and re-purposing of empty buildings. The cinema site in the centre of Tunbridge Wells has been derelict for years and there are numerous empty buildings in the Town Centre which could be re-purposed.

Biodiversity – bland statements about net gains for biodiversity. How on earth do you replace hundreds of years of nature building habitats for flora and fauna by planting a few urban street trees and sticking in a few green wedges. The whole concept is laughable except I see nothing to laugh about. I know just from what I see in my own garden, that this area is home to protected species – native slow worms, grass snakes, common lizards etc., never mind all the birds and mammals and yet ancient woodlands are seen as disposable by this Council. How does the removal of woodland help the fight against climate change and improvement in air quality. Planting new trees will not be effective in this respect for many years to come.

New roads are proposed, a link road to the new Tudeley town and a Colts Hill by-pass which will take up more farmland. I struggle to understand why good quality farming land both for the Colts Hill bypass and Tudeley new town is considered suitable for housing. Surely the aim of reducing our carbon footprint is better served by growing food locally. Once you have destroyed this land it cannot be returned to food production.

Provision of suitable housing – when left to developers, profit is king. The big expensive houses they want to build do not fulfil the needs of the community and will they sell? There are two new 4 bed detached houses in Five Oak Green which took nearly 2 years to sell. If the demand was there, why have they not sold? Is it perhaps because at £850k we can't afford them?

When the time comes in the not too distant future when I want to move into more suitable accommodation, I want a small affordable bungalow in the local area, something which is in very short supply and unlikely to be provided by these new developments. The overpriced retirement apartments with their no doubt high service charges which are springing up all over Tunbridge Wells are something I shall never consider buying.

Affordable housing is not something that developers want to provide, the need cannot be met by the market because it does not provide the profits required.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Ryan Holliday [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Ryan Holliday [REDACTED]
Comment ID	PSLP_1008
Response Date	02/06/21 23:18
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Ryan Holliday
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1 for paddock wood and land at east capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Paddock Wood for over 10 years with my young family.

I feel that this development will have a very negative impact on paddock Wood residents. The traffic congestion this will cause via tudely and tonbridge will cause delays and pollution. The loss of green space after all the other green space lost to development makes this a bad choice of location for such a large development. Residents will have little space left to walk and enjoy nature.

This area is also prone to flooding, I have spent many times clearing the ditches to stop neighbours gardens becoming water logged. This development needs huge consideration.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Reconsider the area, build on brownfield. Don't ruin our beautiful countryside which has been a safe haven for so many during this past year.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_44

Comment

Consultee	David Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Hughes [REDACTED]
Comment ID	PSLP_674
Response Date	29/05/21 16:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	dh TWBC Plan Capel PW STR SS 1 29 5 21.pdf
Question 1	
Respondent's Name and/or Organisation	David Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I attach my representation by pdf format below Question 8

[TWBC: for ease of reference representation copied here]:

28th May 2021

Representation on the TWBC Reg 19 Local Plan Consultation relating to the East Capel and Paddock Wood Development Plan

Policy STR/SS 1

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Introduction

As a local resident, I write to object strongly to TWBC's plans to build 3,450 new homes at Capel and Paddock Wood because the plans are not justified and unsound for the reasons set out below, particularly so alongside 2,800 new homes in a nearby planned 'garden settlement' in Tudeley. I also believe the plan will create considerable risks for and a major long term financial burden on TWBC.

Personal and Professional Background

I have lived in West Kent for almost all my life, living and going to school in Tonbridge and commuting from Tonbridge station. I have known Paddock Wood, Tudeley, Five Oak Green and Capel for nearly 60 years and we have owned a house in the area for some 35 years.

For over 10 years, I have been the Chief Investment Officer of a large, listed sustainable infrastructure group with some 300 infrastructure investments. These infrastructure investments include renewable energy and waste to energy plants, waste processing plants, hydropower, roads, wastewater treatment plants and affordable housing. So, I am experienced in assessing such plans and their risks, particularly from a long term financial view.

When I was a child, Paddock Wood and its environs was prime farming country with quiet country lanes, orchards and hop fields. Over the 60 years, the town and area have lost their farming focus with commuting from and within the area now predominating, with consequent traffic, parking and transport pressures. The lanes are no longer quiet. Tonbridge has grown substantially and similarly developed into a commuter focused town, as has Tunbridge Wells, both again experiencing the same increasing pressures.

Forecast Demand in the Borough

As explained below, many aspects of the Pre Submission Local Plan, the Infrastructure Delivery Plan, the Viability Assessment and the Sustainability Appraisal plus related Appendices prepared by TWBC are, from financial and risk viewpoints, **inadequately assessed and unsound**, some being based on unrealistic and arguably naive assumptions and if implemented could ultimately create contingent costs and long term financial burdens on TWBC and also significant additional burdens on Tonbridge and Malling BC.

This entire planning process is based on a forecast. The forecast annual demand across the Borough is for 678 houses. In my experience as an infrastructure investor, I have found forecasts are just that, in that they are rarely met, often missed, delayed, based on wrong or false assumptions and are almost always adversely impacted by factors which were either incorrectly assessed or not even considered at all. The same is highly likely to apply to this forecast and the above two development plans. The two plans are essentially large commercial construction projects and, to be implemented effectively, require major support and infrastructure investment from various public and private sector parties over the long term which might only partially be made or not at all.

I shall leave aside any argument about how the considerable potential development profits and potential costs are not shared appropriately with TWBC.

The Alternatives

Through these plans, TWBC are endeavouring to meet a 20 year forecast in two, large, simultaneous steps which is simply unnecessary if only 678 dwellings are required annually.

A more local series of small, incremental, Borough wide, sympathetically designed housing developments, which could include some further gradual development around Paddock Wood, would be much more financially sensible, prudent, more controllable and much lower risk for TWBC and all the other relevant parties and so in practice be more flexible and achievable. The two plans are **not justified** on these bases. The Times recently indicated that 106,000 homes were forecast to be required in the whole of South East England in the next five years, of which no less than 3.2% are proposed in one small area of just one Borough which seems excessive and not necessary.

East Capel and Paddock Wood

The plan for East Capel and Paddock Wood envisages 3,450 new dwellings, of which 40% will be affordable homes. With 2.26 people forecast per dwelling, this implies 7,800 new residents. The Tudeley plan envisages 2,800 new dwellings being built, implying 6,300 new residents, together totalling 14,000 new residents, comprising perhaps 4,000 children (1,800 at Tudeley and 2,200 at Capel/PW) and 10,000 adults, if both proceed. Similarly, in terms of cars, it is likely that these residents will own some 6,000 cars (3,300 at Capel/PW and 2,700 at Tudeley) as some families with a working parent may need two cars while some elderly people may not have cars.

These two capital intensive and high risk projects are concentrated in one small area of the Borough where the existing infrastructure is poor or non-existent at Capel and Tudeley and so completely new infrastructure or heavily upgraded infrastructure will be required. To succeed, all the relevant infrastructure providers will need to agree and coordinate their investment programmes but, because the two projects are so long term, I believe investment returns are unlikely to be considered sufficiently attractive in the first few years to justify the major investment required, casting doubt on their implementation and viability. With two projects, almost double the capital expenditure will be required but by being close to each other, both projects will impinge on the other, potentially slowing the rate of sales (and infrastructure returns) of each. Phasing of all the infrastructure investment will be important and if not done or only partially done, the viability of the projects will again be brought into doubt. **The plans are accordingly not effective and unsound.**

Because of their close proximity, the two plans and their impacts are intertwined hence I have felt obliged to refer to both in the following paragraphs which cover the principal elements of the Capel and Paddock Wood plan which are considered unsound.

Impact on Tonbridge

Neither the Capel and Paddock Wood plan nor the Tudeley plan makes little if any real reference to the impact on nearby Tonbridge or to any consultation about these plans with Tonbridge and Malling BC. Tonbridge is already under much pressure and, as a result of both developments, will experience much heavier congestion, much greater pressure on schools and facilities, greater numbers of commuters and incur considerable additional costs. Parking in Tonbridge is a particular issue already.

Tonbridge and Malling BC will bear much of the brunt of the practical issues arising from these developments. If both developments proceed, this will create a Tonbridge/Paddock Wood 'super town.' However, Tonbridge and Malling BC will receive no extra cash to cover these high additional costs.

There is no mention of how this development might impinge on, disrupt or possibly even support the plans of Tonbridge and Malling BC. This is an example of TWBC merely offloading issues and costs to third parties by not planning properly. Without detailed consultation with Tonbridge and Malling BC, of which there is little evidence, and further investment in Tonbridge, **the plan is not justified or effective and so is unsound.**

Education

With only two primary schools and an expansion of Mascalls proposed, the plans to meet the educational needs of 2,200 children from East Capel/PW are simply inadequate, ignoring the needs of the many children from the other current developments in Paddock Wood itself. The planned provision for nurseries is similarly inadequate. For the 1,800 children from Tudeley, it is proposed to establish one new secondary school and one new primary school and expand Capel Primary School. Even when built, common sense says this secondary school of perhaps 1,000 pupils, new primary school of say 200 children and expansion of the small Capel primary school will be inadequate, and particularly so if both proceed. The remaining children numbering perhaps 1,500/2,000 will need to be driven or bussed daily to either Tonbridge or Tunbridge Wells (at least 50 or 60 busses twice or more each day). There is already incredibly strong existing demand for places in the good local schools in Tonbridge and Tunbridge Wells. It is naïve to think that some 1,500/2,000 pupils will somehow be absorbed in the existing schools in these two towns - in practice many pupils will have to be driven or bussed far away to Maidstone or Sevenoaks, all adding to traffic and congestion.. In reality, another two or possibly three large schools will need to be built by KCC if both projects proceed. There will inevitably be children with special needs, the cost burden of which will fall on KCC and TWBC.

Again, TWBC will be simply be imposing these education costs elsewhere, displacing the education of children in other Boroughs and creating congestion, particularly in Tonbridge and Tunbridge Wells.

The plans make no assessment of these education and congestion costs or whether KCC can or will agree to fund these new schools. **So, the plans are not effective and are unsound.**

Healthcare

Regardless of whether one or other or both projects proceed, the number of new residents will necessitate new healthcare facilities, the plans envisaging one new GP surgery which will be particularly busy and will require some 6 to 8 doctors plus support staff. If both proceed, there will be 14,000 new residents ultimately requiring these healthcare services. There will be considerable extra pressure and costs imposed on Pembury Hospital which is already strained. As stated in the plan, a significant number of the adults are likely to be over 65 and elderly, some with special needs and as they age, increasing demands will be made on local health services. The same will apply to the up to 4,000 children. All this will impose significant additional and increasing social services costs on TWBC and medical provision costs on the local Health Trust.

The plans do not properly address these issues nor quantify these costs so are **not effective and are unsound** and will impose potentially large contingent costs on TWBC.

Traffic Congestion. Roads. Rail, Parking and Public Transport

With some 3,000 to 6,000 additional vehicles, existing traffic congestion will become appreciably worse. The already busy **A228 road** to Pembury will be heavily used by these new cars and will need widening at considerable cost, none of which appears to be included in the plans. The Capel plan implies only £Gm will spent on improving links to this road. At peak times, there is already considerable congestion on the A228 and the roundabout at Five Oak Green and around Pembury and Tonbridge which will all be exacerbated by these additional vehicles. As regularly evidenced by sirens, the A228 is a major route for ambulances going to and from Pembury Hospital and it is perfectly possible that this congestion will threaten lives.

The already busy Tonbridge/Five Oak Green **B2017 road** will be heavily used by these new cars and is already in poor condition, being originally a country lane. This will be one of two principal access roads to the Tudeley garden settlement (the other being the feeder road from the A228) and as it stands will be totally inadequate when used by 3,000 to 6,000 new cars plus busses plus cyclists plus waste lorries and heavy construction traffic (possibly over 20 years). It is bumpy, windy, narrow in parts, prone to surface water flooding and if a cyclist is in front, prone to delay as you cannot pass. The plans make much of increased cycling but that will become increasingly dangerous on this road.

The road has moved and settled over time, suggesting compaction and poor foundations. It will deteriorate further quite rapidly with increased daily use from up to 6,000 vehicles and heavy construction traffic. In other words, it will need to be both widened and effectively rebuilt. The Tudeley plan envisages only £3.1m being spent on widening which is totally inadequate. The proposed much shorter Capel by pass to the Tudeley garden settlement across open fields is estimated to cost £45m (only half the cost of which is included in the plans) which gives an indication of likely costs which could easily be a multiple of this figure.

The plans are **not effective** in this regard.

With 50% of the working adults likely to **commute to London**, inadequate **parking** at Paddock Wood Station and with parking at Tonbridge normally full, there will be a major increase in journeys and congestion from 'dropping people off from the developments in Paddock Wood High Street or by Tonbridge Station and much illegal street parking in Paddock Wood High Street or Waitrose Car Park waiting for commuter trains to arrive. There is no scope to significantly increase such parking. Similarly the plans say that no extra trains can be made available so about 1,000 new commuters will try to travel at peak times on the few existing trains (which number is equivalent to some two or three additional trains). This will create overcrowding and adverse, knock on effects on other passengers further up the main line.

The plans do not properly address these issues and so are **not effective and unsound** in this regard.

Parking on the East Capel development is inadequate and insufficient for visitors.

The plans refer to making increasing use of **public transport**. In the plans, private bus companies have stated they will not run services at a loss and the plans show £3m of total bus subsidies. If these are insufficient, the costs of the services will contingently and ultimately fall on TWBC. The plans refer to creating **bus lanes and cycle lanes**. These will again necessitate road works and widening at yet again considerable cost to KCC. Again, there is no indication that KCC will bear these costs, casting doubt on timing and viability.

The plans have not been properly assessed and so are **not effective and unsound** in respect to these two aspects.

The Capel/PW plan proposes £5m will be spent on cycling routes and improvements while the Tudeley plan proposes £17.5m. This investment makes big assumptions about the take up of cycling by 14,000 new residents which I think are likely to be overoptimistic given the demographics.

Water and Flooding

The plans acknowledge Kent suffers severe water stress. The water needs of 14,000 people will create further localised stress. The current water supply infrastructure in the area is already inadequate and certainly insufficient to supply 14,000 new residents. The Capel/PW plan envisages only £220,000 being spent on water connection and the Tudeley plan only £154,000. This is another example of both plans simply pushing the cost of building major infrastructure onto another party which may or may not do so in their own time. In the medium term, the water shortage can only be met properly by further investment at Bewl Water or new reservoirs as aquifer abstraction is already excessive. The plans refer to residents reducing water usage to 110 litres per person per day but this is likely to be an unrealistic and possibly naïve assumption as water consumption is currently much higher.

Paddock Wood already suffers from inadequate sewage and waste water systems, as demonstrated by several sewage floods to the East of the town over recent years. Because of the flat, low lying nature of East Capel, all water will need to be pumped in and away requiring yet more investment which yet again is not assessed or quantified. The Tudeley and Capel/PW plans have each budgeted only £450,000 for sewage and foul water works which is woefully inadequate for 14,000 people.

The plans are **not effective and unsound** in this regard.

With the River Medway, Kent's biggest river, **flooding** regularly, this has major ramifications for any development around Capel, Paddock Wood and Tudeley. I remember the severe floods of 1968 (with landing craft going down the sandbagged Tonbridge High Street) while other severe floods occurred in 2000, 2001, 2013, 2014 and 2019 despite the Leigh flood barrier being in operation (please refer to the web for pictures and videos). The Medway contains much treated sewage water so any such flooding has other effects.

Surface water flooding in the area is frequent, connected with overflowing streams, drainage and sewage. East Capel is particularly prone to flooding. The small streams are prone to blocking during

heavy rain which causes local flooding. Only in January 2021, Badsell Road was blocked by flooding, with an AA van parked nearby for two days to pull out cars from the flood. Nearby Five Oak Green is prone to surface water flooding and I clearly remember the Fire Brigade pumping out houses on occasion in the last few years. In heavy rain the B2017 can be dangerous from surface flooding as I have personally experienced while the A228 near Whetsted suffers similarly. The fields where the East Capel development is proposed are often waterlogged in Winter. The proposed North Paddock Wood development will be similarly liable to flooding.

Surface water flooding is a bigger problem than fluvial or sea flooding nationally and so the East Capel site is doubly prone. These are major problems which have not been properly considered and **so the plan is not effective and is unsound**. If the East Capel and Northern Paddock Wood development areas regularly flooded, that part cannot be sustainable so **the plan is inconsistent with national policy**.

In other words, the question is when, not if, will the inevitable flooding occur.

The following comments (a) to (g) relate to flooding at East Capel and Paddock Wood:

- . The plan indicates suitable steps will be taken to mitigate the risk of flooding but this will require major investment in bunds, flood gates and barriers, flood storage, drainage and pumps. The plans are not particularly clear referring to £991,000 to be spent on flood defences and a raised platform costing £5.3 million. This will be totally inadequate to protect 3,450 homes on a flood plain which is also prone to surface water flooding. Again the nature and costs of such mitigation measures are not properly explained nor is how such costs will be borne, by whom and over what time period. However, given the flat nature of the land, it is likely to be £10s of millions, not low£ millions;
- . Any such flood mitigation measures will disturb water flows and ground water, increasing the risk of flooding on neighbouring land and properties, as well as increasing flood risk This may well require even more mitigation measures about which there is no mention at all;
- . Flooding causes insurers their biggest losses by far. Given their heavy losses from increasing floods nationally, insurers are increasingly selective about insuring properties on flood plains and without that mortgages cannot be obtained. **Without good mortgage availability, the East Capel and Northern Paddock Wood developments would simply not be viable. I did not find references in the plans to this key underlying assumption nor to the likely attitude of insurers or the cost of flood insurance.** Flood insurance rates could be high and, after the first flood, might only be obtainable at expensive rates or on unacceptable terms or possibly not at all, leaving homeowners stranded with unsellable homes. This has already happened elsewhere in the UK. As a sustainable infrastructure investor, I am putting increasing weight on the possibility of an asset becoming stranded from such environmental events and will not approve such investments;
- . These houses will be expensive but with the enhanced flooding risk, it is likely that they may have to be sold relatively cheaply, below the forecast prices, to attract This casts doubt on the financial viability of the scheme but yet again the plan makes no reference to this possibility;
- . As the East Capel and Northern Paddock Wood sites will be developed in phases over 20 years, flooding during that time is inevitable. It is possible that the site might then be only **partly finished** and not developed any further post such flooding. In that event, it is highly likely that planned improvements, infrastructure and facilities will not be completed or built - in other words, the plan as currently envisaged would then only be partially implemented which casts doubt on its objectives being met and

This has not been assessed and so the plan is **not effective and particularly unsound** in this regard.

- . Much is said in the plan about Suds on which only £745,000 is proposed to be spent for 3,450 dwellings but this ignores the fact that the water table is already high and just mimicking nature will not help the water drain away - it will need to be pumped away to be effective, again requiring significant investment and cost which is again not assessed or
- . Finally, following the inevitable floods, TWBC will incur considerable costs dealing with the aftermath g. emergency shelter, displaced families, damaged infrastructure, as will the KCC and the emergency services. With ever more limited financial and human resources, TWBC would do well to avoid this risk and potentially large costs, never mind the reputational impact.

The plan is **not effective and particularly unsound** in the above regards.

Electricity, Gas and Broadband

As no new houses can be connected to the gas grid from 2025, the two developments will need to be powered entirely by electricity. This will require extensive investment in major HV transmission lines and stepdown transformers, particularly as new EV charging infrastructure will be required eventually for some 6,000 cars given that petrol and diesel cars will be phased out after 2030. All the cables will need to be buried. This is a major engineering task in addition to road building, road widening, school building, GP surgery, sports facilities etc. The Capel/PW plan budgets £10.5m and the Tudeley plan budgets £11.5m solely for electricity connections and diversions with no discussion about grid infrastructure or who pays for these or how construction will be phased. In my experience, the cost of the grid infrastructure and substations will be many £millions and will not be installed for several years. If completely new generation capacity and HV systems are needed, I broadly estimate this will cost over £100m for the two developments.

FTTH broadband will be relatively more straight forward to install.

The plan is unclear on this important aspect and so is **not effective and unsound** as a result.

Waste Disposal

The disposal of waste from up to 6,250 new homes will require TWBC and KCC to invest in more waste disposal facilities. This will create yet more heavy vehicle movements on already congested roads and add to the waste already trucked away from North Farm. These additional costs do not seem to be factored into the plans and will be a charge on the annual rates which would rise slowly over time to a total of only some £10m once all 6,250 homes had been built.

Affordable Homes

Although there is a clear and pressing need for affordable homes, it is important to recognize that these may well impose actual and contingent risks and costs on TWBC. As an example, with joint ownership or rent to buy structures, if the tenant defaults in paying rent whether deliberately or through illness or unemployment, it is difficult for any Council to take any action and particularly not evict, leading to losses and costs. The same is true if the tenant does not properly maintain the rent to buy property or ever behaves in an antisocial manner. Through rent to buy, the Council would usually forgo an element of rent and not participate in any increase in the value of the property. Any Council needs to carefully assess such risks and costs which could be particularly significant for 2,500 houses, being 40% of 6,250 new houses, over say the next 30 years.

Financial Overview

As can be seen from the above, neither the Capel/PW nor Tudeley plan properly addresses the financial implications of many important elements arising from their respective development. The plans make a considerable number of assertions and assumptions, the latter both stated and unstated, about how major infrastructure investments will be made and do not properly assess the risks, timings and potential costs. These include:

- . the touching confidence that S106 or CIL payments from the developers will cover many of these costs. These payments will not be applied to the 40% affordable housing element, only to the privately owned 60% element of the 6,250 homes. The Viability Assessment suggests a CIL of £150 per sq metre and that the average house will be around 100 square metres. So the potential total CIL payments could in theory be around £94m £52m for Capel and £42m for Tudeley) but are subject to negotiation which means they could be appreciably less. The developer will probably only pay over time, perhaps of up to 20 years as houses are built so the net present value will be much lower. Since a lot of investment will need to be made in the early years, there will either be a funding shortfall - to be met by TWBC? - or facilities and improvements will only be built over many years with increasing likelihood they will either not be built at all or only at a smaller scale.

The plans do not show detailed cash flow projections or sensitivities and, more importantly, who or how any funding shortfalls will be met and so yet again are **not justified** and may create large contingent liabilities for TWBC.

- . that all the various government bodies, KCC, organisations and utility and other companies will invest heavily to facilitate these two developments. Against the present Covid backcloth and huge debts, it is unlikely that government bodies or KCC currently have the money to make such major investments while utility and other companies will have many alternative, lower risk projects in which to invest offering better risk adjusted returns. Examples in the plans are the bus and rail companies which have already expressed their reluctance to invest or want subsidies .

As explained, by proceeding with these developments, TWBC will be assuming substantial additional risks and costs at a time when it is particularly cash strapped and resource limited. These costs will not be anywhere near covered by the annual rates charge which I estimate will slowly increase up to £10m in year 20, being an average of say £1,500 per annum on 6,250 houses.

The two developments are expected to take some 20 years to be fully completed. However, much of the infrastructure referred to above needs to be installed within the first few years to enable such development. So sewage pipes and systems, HV transmission lines and substations, water mains etc need to be installed before any significant development can be completed. But there will be few paying customers for the first several years, leading to effectively little or no return on the invested capital for many years. The same point relating to timing then arises about cash strapped KCC investing in new schools and the two £multi million (perhaps £100m?) major road investments. These will not be built for years (which puts in doubt if they will ever be built) meaning the plans as drafted are likely to be fiction. The corollary is that there will be further growing congestion and inadequate infrastructure for many years.

Affordability

House prices in TWBC are the second highest in Kent. The plans emphasise that affordability of the houses will be 'very challenging' and suggest a sales price of £650,000 for a small 4 bedroom 150 square metre house on a large mixed housing estate which will be developed for some 20 years. From a financial perspective, this would not be a good investment as price rises will be low as supply continuously increases over time. From an environmental viewpoint, living in a large building development doubly prone to flooding with a big mortgage and construction ongoing for 20 years may not be overly enticing to potential buyers. I have doubts that people will be able - or possibly willing - to afford these prices and, as the viability of the whole development depends on selling the 60% at these prices to pay for the 40% of affordable housing, it raises doubts about whether the developments will ever be completed. The plan is **not effective or justified** accordingly.

Greenbelt

TWBC seem to have focused on two particularly high risk, high cost, long term developments on the first available flat land in the Borough outside the AONB boundaries, notwithstanding this is protected Green Belt on and near flood plain and largely dismissed smaller, significantly lower cost, lower risk opportunities offering considerably more flexibility to meet demand as it gradually arises over time. Instead, TWBC believe in their own forecasts over 20 years and want to go for two big solutions simultaneously. From a financial and risk viewpoint, this is unwise as forecasts are rarely met and, as explained above, there are big costs and risks attaching to each plan. If a small development does not work, the fall out is manageable which cannot be said of the two developments proposed. With local incremental development, infrastructure investment will also be incremental, more likely to be made and more manageable. As such, I do not believe there are sufficient exceptional circumstances to justify declassifying Green Belt land for these two developments and the plans are **not justified**.

Summary

It is clear for the reasons stated above that the Capel/PW development plan is unsound. It has not been properly assessed in a number of areas, is high risk and high cost in many ways compared to the alternatives and creates large and unnecessary contingent costs on TWBC.

The plan should be dismissed accordingly.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

So I may comment on any further consultation on matters raised by the Inspector

If you would like to attach a file in support of your comments, please upload it here. [dh TWBC Plan Capel PW STR SS 1 29 5 21.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Deborah Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Deborah Hughes [REDACTED]
Comment ID	PSLP_445
Response Date	26/05/21 16:08
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Deborah Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Capel: Policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

22nd May 2021

Objection to TWBC's Development Plan for Capel and Paddock Wood

STR/SS 1

As a long standing Tonbridge resident and with my mother in care also in Tonbridge and friends and relatives in the area, I am writing to register my very strong objections to TWBC's plans to develop a huge unnecessary estate of 3,450 houses on Green Belt land at Capel on the Medway flood plain. Alongside the nearby Tudeley 'garden settlement,' this will create a Paddock Wood/Tonbridge 'conurbation' or mega town with TWBC benefitting from the rates while we residents and Tonbridge and Malling District Council will carry a lot of the extra costs and have to deal with the major problems which will arise. Many of my friends have expressed similar strong objections to me. TWBC are largely just dumping the adverse effects of both developments on Tonbridge residents and TMDC with very little thought and, I am informed, no proper consultation with TMDC. **The plans have not been positively prepared** as they just push the resulting problems into the neighbouring Borough.

The whole point of Green Belt land is to act as a buffer against encroaching development between towns and protect the environment, nature and landscape yet TWBC seems to somehow think there are exceptional circumstances here to break this important law. The Capel and nearby Tudeley developments ignore other better, cheaper, more practical and sensible options across the Borough. TWBC has simply chosen two easy large solutions, effectively washing their hands of better alternatives. The Capel plan is **not justified** and the policy is **unsound**. With 3,450 homes, the plan has not properly considered many factors and should be scrapped as it simply does not work. Some of these factors are:

Flooding – every longstanding local in Tonbridge and Paddock Wood knows all about Medway flooding. The flat site is right next to the biggest river in Kent famous for its frequent floods and is in prime flooding territory. The plan mentions flood prevention measures but these look totally inadequate - even the Leigh barrier couldn't cope in 2019 with cars and blocks of flats under water as a result. Thinking about house purchasers, I wonder if they will have watched the videos and photos on the web showing the frequent floods in the area. In January this year alone, there was heavy surface water flooding. The site will inevitably flood and the homeowners and TWBC will have to deal with the damage, clean up and future sales of the houses. Not enough attention has been given to these major problems (nor the huge costs of flood prevention measures) and so **the plan is not effective**

and is unsound. I cannot see that the development is sustainable if it is regularly flooded so **the plan is inconsistent with national policy.**

The 60% of private houses will be expensive. I have real doubts that people will buy expensive houses liable to flooding on a huge estate which will be built over 20 years. If they are only partly sold, the whole project will be financially unviable and create major problems for TWBC. The project is **not effective** in this regard.

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge Road and overloading of the already congested A228, especially in school term and the peak mornings and evenings. I doubt if the widening plans and Capel by pass will be built by KCC which is cash and resource strapped. There will be gridlock at peak times. If the road works are carried out, I believe this will only be done well after the development has commenced. The plan is **not effective** about this major issue.

There will be a large increase in commuting. Parking in Paddock Wood is poor and parking Tonbridge is already inadequate. With more commuters, no extra trains and no extra parking at the station, there will be chaos near the two stations at peak times. The plan is **not effective** in this regard. The faith in more cycling sounds good but will hardly make a difference and I am sure there will be many serious cycling accidents on the busy roads.

The planned investment in two primary schools and expansion of Mascalls will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There is also likely to be increased demand in the area from the Tudeley development. In reality, KCC are not going to invest in all these schools in one small area given the requirements in the rest of Kent and their own cash shortages so there will be a large shortage in school places. Schools will only be built well after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and be paid for by someone else.

There are literally no services like electricity and water anywhere near the site – the whole idea of Green Belt – so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from Capel and the nearby Tudeley development will create major water supply issues, not forgetting sewage issues, the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

Although the plan might look good on paper, it is essentially **flawed and unsound** and should be scrapped. Imagine being there on a cold January night in a storm with the River Medway rising.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Graham Hughes [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Graham Hughes [REDACTED]
Comment ID	PSLP_361
Response Date	25/05/21 09:59
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graham Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Development Plan for Capel and Paddock Wood

As a long standing Tonbridge resident, educated in Tonbridge and with relatives in the town, I strongly object to TWBC's plans to develop a huge estate of 3,450 houses on Green Belt land in Capel on the Medway flood plain. Alongside the nearby Tudeley 'garden settlement,' this will create a Paddock Wood/Tonbridge 'town' with TWBC benefitting from the rates while we Tonbridge residents and Tonbridge and Malling District Council will carry a lot of the extra costs and have to deal with the major problems which will arise. Many of my local friends have similar strong objections. TWBC are largely just dumping the adverse effects of both developments on Tonbridge residents and TMDC with very little thought and I believe no proper consultation with TMDC. **The plans have not been positively prepared** if they just push the resulting problems into the neighbouring Borough.

Green Belt land is a deliberate buffer against encroaching development between towns and is designed to protect the environment, nature and landscape yet TWBC thinks there are exceptional circumstances here to break this important law. The Capel and nearby Tudeley developments ignore other better, cheaper, more practical and sensible options across the Borough. TWBC has simply chosen two easy large solutions, effectively washing their hands of better alternatives. **The plan is not justified and the policy is unsound.** For 3,450 homes, the plan has not properly considered many factors and should be scrapped as it simply does not work. Some of these factors are:

Flooding – I have witnessed many local floods. The flat site at Capel is right next to the biggest river in Kent, famous for its frequent floods and is prime flooding territory. The plan mentions flood prevention measures but these look totally inadequate - even the Leigh barrier couldn't cope in 2019 with cars and blocks of flats in Tonbridge flooded as a result. There are many videos and photos on the web showing the frequent floods in the area. In January this year alone, there was heavy surface water flooding. The site will inevitably flood and the homeowners and TWBC will have to face up to the damage, clean up and inability to sell the houses in future, all resulting from poor flawed decision making. Not enough attention has been given to these major problems (nor the huge costs of flood prevention measures) and so **the plan is not effective and is unsound.** I cannot see this development is sustainable if it is regularly flooded so **the plan is inconsistent with national policy.**

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge Road and overloading of the already congested A228, especially in school term and the peak mornings and evenings. I doubt if the widening plans and Capel by pass will be built by KCC which is cash and resource strapped. There will be gridlock at peak times. If ever built, the roads will only be constructed well after the development has commenced. The plan is **not effective** about this major issue.

There will be a large increase in commuting. Parking in Paddock Wood is poor and parking Tonbridge is already inadequate. With more commuters, no extra trains and no extra parking at the station, there

will be chaos near the two stations at peak times. The plan is **not effective** in this regard. The faith in more cycling sounds good but will hardly make a difference and there will be many serious cycling accidents on the busy roads.

The planned investment in two primary schools and expansion of Mascalls will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There is also likely to be increased demand in the area from the Tudeley development. In reality, KCC are not going to invest in all these schools in one small area given the requirements in the rest of Kent and their own cash shortages so there will be a large shortage in school places. Schools will only be built well after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and be paid for by someone else.

There are literally no services like electricity and water anywhere near the site – the whole idea of Green Belt – so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from Capel and the nearby Tudeley development will create major water supply issues, not forgetting sewage issues the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

Although the plan might conceptually good on a computer screen, for the above reasons, **the plan is flawed and unsound.**

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sarah Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Sarah Hughes [REDACTED]
Comment ID	PSLP_433
Response Date	26/05/21 14:17
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Sarah Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The whole point of Green Belt land is to act as a buffer against encroaching development between towns and protect the environment, nature and landscape yet TWBC seems to somehow think there are exceptional circumstances here to break this important law. The Capel and nearby Tudeley developments ignore other better, cheaper, more practical and sensible options across the Borough. TWBC has simply chosen two easy large solutions, effectively washing their hands of better alternatives. **The plans are not justified and the policy is unsound.** With 3,450 homes, the plan has not properly considered many factors and should be scrapped as it simply does not work. Some of these factors are:

Flooding – every longstanding local in Tonbridge and Paddock Wood knows all about Medway flooding. The flat site is right next to the biggest river in Kent famous for its frequent floods and is in prime flooding territory. The plan mentions flood prevention measures but these look totally inadequate - even the Leigh barrier couldn't cope in 2019 with cars and blocks of flats under water as a result. Thinking about house purchasers, I wonder if they will have watched the videos and photos on the web showing the frequent floods in the area. In January this year alone, there was heavy surface water flooding. The site will inevitably flood and the homeowners and TWBC will have to deal with the damage, clean up and future sales of the houses. Not enough attention has been given to these major problems (nor the huge costs of flood prevention measures) and so **the plan is not effective and is unsound.** I cannot see that the development is sustainable if it is regularly flooded so **the plan is inconsistent with national policy.**

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge Road and overloading of the already congested A228, especially in school term and the peak mornings and evenings. I doubt if the widening plans and Capel by pass will be built by KCC which is cash and resource strapped. There will be gridlock at peak times. I believe only

some of the road works will be carried out and then well after the development has commenced. The plan is **not effective** about this major issue.

There will be a large increase in commuting. Parking in Paddock Wood is poor and parking Tonbridge is already inadequate. With more commuters, no extra trains and no extra parking at the station, there will be chaos near the two stations at peak times. The plan is **not effective** in this regard. The faith in more cycling sounds good but will hardly make a difference and I am sure there will be many serious cycling accidents on the busy roads.

The planned investment in two primary schools and expansion of Mascalls will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There is also likely to be increased demand in the area from the Tudeley development. In reality, KCC are not going to invest in all these schools in one small area given the requirements in the rest of Kent and their own cash shortages so there will be a large shortage in school places. Schools will only be built well after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and be paid for by someone else.

There are literally no services like electricity and water anywhere near the site – the whole idea of Green Belt – so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from Capel and the nearby Tudeley development will create major water supply issues, not forgetting sewage issues, the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

The plan is fundamentally flawed and unsound.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Christopher Hyatt-twynam [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Christopher Hyatt-twynam [REDACTED]
Comment ID	PSLP_1003
Response Date	02/06/21 22:51
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.5
Question 1	
Respondent's Name and/or Organisation	chris twynam
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 Tudeley village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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For 36 years my wife and I have lived on Hartlake Rd in Tudeley Hale. We are just outside the edge of the proposed Tudeley village development. Being retired now, twice every day I walk from my house in all directions through this beautiful part of the Medway valley with its open vistas, large skies and extensive bird and insect life. 2800 houses and their residents will affect everything in no positive way. For the people and wildlife who gain so much from this unique valley I totally oppose the Tudeley village plans as a simply dreadful idea.

Assuming Tunbridge Wells Council have to build 2800 houses somewhere in their Borough (this itself is dubious), let's look at the Pros and Cons of choosing Tudeley as the location for the new village/town.

Pros: (reasons to build here)

- 1 One landowner makes it easier for the Council to deal with.
- 2 There's a mainline railway through the middle of the site so the Council can pretend (against statements from British rail), that residents can use a train and not drive anywhere.
- 3 The site is sloping and just above the Medway flood plain so only existing residents and villages such as Yalding downstream will receive the runoff from roofs and tarmac while the new houses should be OK.
- 4 The site is right on the edge of the Borough so income will go to Tunbridge Wells and problems to Tonbridge at only 2 miles away.
- 5 The site is Green Belt so easier to build on than the AONB just across the road.

Cons: (reasons to build elsewhere)

- 1 Its a very green an beautiful slope down to the flat and lush Medway valley. The construction will be obvious to all from the North East with views of it from most of Hartlake Rd, Golden Green and Three Elm lane, the Medway itself and all the way up to East Peckham old church. A 300 acre eyesore visible for miles.
- 2 Transport. The road from Five Oak Green to Tonbridge is a winding country road already stationary at times. Residents will be driving to Tonbridge and then trying to access the services there or driving to reach the A21 corridor for Tunbridge wells and Sevenoaks. I live here and use that road for 70% of my journeys. The road is not suitable for more traffic and the access into Tonbridge is very slow even at quiet times. Tonbridge is a busy town with the car parks and roads already near their capacity. Not all the children are going to attend the proposed school, with such excellent other schools nearby as options. The new village would be an urban extension of Tonbridge as the old village is a rural extension now. Amazon deliveries alone from the A21 will be a challenge. A railway station which is most unlikely is not going to make this village in any way sustainable.
- 3 Cooperation of neighbouring Borough. Tonbridge Council demanded a robust objection to the Tudeley village (meeting 17 May 2021). It would be a disaster for Tonbridge and would alter the very nature of this lovely market town.
- 4 Noise pollution. I can hear the skylark and buzzards from my garden. They and many others will have to move away.

- 5 Air pollution. Forcing a village of residents to drive to get anywhere or most things will add pollutants to the countryside air. Never mind all the gas and oil boilers.
- 6 Light pollution. The Poacher pub is the main light polluter in Tudeley. It can be seen from a fair distance at night. The village will be like a beacon in comparison extending to areas of countryside which have next to no light pollution now.
7. Agriculture. PSLP EN20 The loss for ever of 300 productive acres of grade 2 and 3 land is a travesty if it can be avoided and goes against current Government ethos.
8. Alternative site. The proposed development option of 1800 houses next to Tunbridge Wells Retail park would seem far more suitable as residents could walk or cycle to the park and High Brooms railway Station. It also has easy access to the A21 corridor and cannot be seen from most directions. Also the land is grade 4 agricultural land and although AONB is difficult to compare favourably with Tudeley.
- 1 Community. The railway splits the proposed village into 2 halves with just one existing narrow tunnel lane joining them at the present time. The cost and disruption to a mainline railway of building more tunnels make their future existence questionable failing the whole village plan.
- 2 Biodiversity. PSLP EN9. DEFRA's biodiversity 2020 a strategy for England's wildlife aims to halt overall biodiversity loss. This area of Tudeley is rich in biodiversity. KMBRC records show 53 bird species considered to breed here. 70 species of bird regularly rely on the Tudeley site to overwinter or breed. TWBC promise a 10% increase in biodiversity once they have built 2800 homes on 300 acres and let loose 800 cats, 1000 dogs and numerous rats on the surrounding area. They are just playing with figures and not reality.
- 3 Local housing need. Does that mean drawing people from London to come and live in the new urbanised countryside.
- 4 Urban sprawl. The new village simply reduces the green belt breaker between Tonbridge, Five Oak Green and Paddock Wood. What we need is green corridors not urban ones.
- 5 New link Rd. The local plan shows a link road from Capel school to the A228. Straight through green belt and next to AONB to try to get traffic to and from the proposed village to Tunbridge Wells. From experience most traffic will wish to reach Tonbridge or Maidstone and M20 rather than the congested streets of Tunbridge Wells. How many houses will need to be built before this road materialises and breaks up another rural area.
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- 15 .Church. The grade 1 church of all saints at Tudeley is world famous and visitors can enjoy the Chagall windows and view the church overlooking a green idle. The new village will extend down behind the church for as far as you can see.

The whole plan for Tudeley village is **unsound, unsustainable and unrealistic**. The village would destroy an area mentioned in the Domesday book for ever.

The local council elections showed the lack of faith and lack of agreement the populous of the Borough and certainly Capel, have for the Council. The chairman has been forced to resign and the Conservatives have lost their majority against the general tone in the Country.

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Question 6

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Remove Tudeley village from the local plan and add Castle hill development

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jose Hyatt -Twynam [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jose Hyatt -Twynam [REDACTED]
Comment ID	PSLP_997
Response Date	02/06/21 22:24
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jose Hyatt-Twynam
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1 Strategy for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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STR/SS 1 Paddock Wood including land at East Capel

Green Belt PSLP 5.160 Green Belt has several purposes including: assisting in urban regeneration, to check unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside from encroachment. (In the 'Assessment of Green Belt Sites' the contribution to GB purposes for STR/SS1 scored 'strong' for safeguarding the countryside, from encroachment. In this case Green Belt in East Capel prevents Paddock Wood merging with Five Oak Green and ultimately Tonbridge. The overall harm from release is recognised as 'high'. Comparing this with other allocated sites, which all (except STR/SS3) scored less on 'overall harm', it appears that no weight is being given to Green Belt criterion.

The NPPF paragraph 136 states that, once established Green Belt boundaries should only be altered in exceptional circumstances are fully evidenced and justified. that 'there should be no inappropriate development on Green Belt unless very special circumstances can be demonstrated to show that the benefits of the development will out weigh the harm caused to the Green Belt'.

Releasing land from the Green Belt for development is not 'sustainable'- it is a finite resource. TWBC have yet to provide a good case for the 'exceptional circumstances' and the justification for releasing Green Belt.

The PSLP is therefore 'unsound'.

PSLP Policy EN 20Agricultural Land

The NPPF 2019 states that Local Planning Authorities should protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals and protect all soils by managing them in a sustainable way. Policy EN 20 of the TWBC PSLP reinforces that statement.

The land at East Capel is Agricultural Land Classification ALC Grade 3 (source Provisional Agricultural Land Classification 1977 Mapping). This is considered as some of the 'best and most versatile land in the country (BMV).

It is land capable of consistently producing moderate to high yields of a range of arable crops, especially cereals, or moderate yields of crops including: cereals, oil seed rape, grass, potatoes, sugar beet and less demanding horticultural crops.

PSLP Paragraph 6.243 states that it is important to use areas of poorer quality agricultural land in preference to that of higher quality, but goes on to explain that 'quality' may be determined by more than the ALC grade. The 'economic and other benefits' such as infrastructure, fragmentation, and access, as well as the contribution land may make to wider ecosystem services and natural capital, are important considerations in relation to the effects of development on agricultural land. Natural capital is "that part of nature which directly or indirectly underpins value to people, including ecosystems, species, freshwater, soils, minerals, the air and oceans, as well as natural process and function".

The Government Policy 'A Green Future: Our 25 Year Plan to improve the Environment 2018' sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- . protect the best agricultural land
- . put a value on soils as part of our natural capital
- . manage soils in a sustainable way by 2030

Planning applications that would result in the loss of best and most versatile agricultural land will need to justify why the loss of the agricultural land is acceptable and also assess the impact of the loss of the agricultural land on the wider farming resource, natural capital, and ecosystem services.

If TWBC are following Government Guidelines (NPPF) and their own Policies it transpires that land at East Capel should not be developed as it is Grade 3, BMV and productive land. TWBC appears to have offered no justification for losing this finite resource which is not only invaluable in contributing to the UK being self-sufficient in food production but also important in providing other important 'ecosystem services' such as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution (EN 20 6.238). It is not a 'sustainable' option, nor does it put a value on soils as part of our natural capital.

Food Policy Experts are warning that with Brexit & Climate Change threatening UK food imports, self-sufficiency should be taken more seriously. The NFU are asking for food security, which has been pushed into the spotlight by the pandemic, to be at the heart of wider government policies. In the mid-1980's the country produced 78% of our food today that figure is 64%. TWBC's plans for Capel will add to the decline.

The UK has an ideal temperate climate for growing food, but if our BMV land is covered in concrete this will be out of the question. If the land in East Capel continued to be farmed, food production could go on ad-infinitum and in essence contribute significantly to the self-sufficiency of the UK.

TWBC are taking the easy, short-sighted option by using large areas of Green Belt, good quality, agricultural land to fulfil their housing requirement for the PSLP. This is not 'sustainable' development contrary to Government Policy advice.

For this reason the PSLP is unsound.

Flood Risk PSLP EN 25

There is policy emphasis in the NPPF (paragraph 155) to steer housing development away from areas with higher flood risk defined as being Flood Zone 3.

A proportion of the potential development area at East Capel is Zone 3 and much of it is Zone 2 and consequently prone to flooding.

The Development Strategy Paper for the PSLP page 84 Paragraph 6.227, tells us that 'the relatively extensive areas of land available for potential housing development in Zones 1 and 2 within the borough has made it possible to align the selection of housing land when performing the Sequential Test, so that all potential new housing sites can be located on land zoned outside of the high-risk flood zone (zone 3).' TWBC are determined to ignore this advice by including the land at East Capel in the PSLP with no good justification other than perhaps the unrealistic ambition of flood risk 'mitigation' and 'betterment'. The erratic weather patterns created by Climate Change can only worsen the risk of serious flooding in this area. Common sense would also tell us that it would be prudent to avoid building homes in East Capel to lessen the potential risk of the misery of flooded homes to residents in the future.

For this reason the PSLP is Unsound and the allocated site at East Capel should be removed from the plan.

Biodiversity PSLP EN 9

NPPF Paragraphs 170 -183 give guidance on 'conserving and enhancing' the natural environment including sites of biodiversity, by 'minimising impacts on and providing net gains for biodiversity'. The process of building 2,000 homes in East Capel can only cause significant harm through direct removal of habitat and indirectly through noise, vibration, light and chemical pollution, to the existing flora and fauna in this area. The ensuing effect from all these factors plus the impact from domestic pets will be devastating on the wildlife.

To calculate Biodiversity losses and gains, planning applications will use DEFRA's Biodiversity Metric 2.0. The metric takes into account factors such as habitat distinctiveness and condition to give an overall score, known as 'biodiversity units.' TWBC are one of the early adopters of Net Gain policies in advance of national rollout. As the methodology is very much in its infancy several research projects (Durrell Institute of Conservation and Ecology, Lancaster Environment Centre) are underway assessing the true long-term effects on ecology in development sites.

The biometric has come under criticism for being based heavily on habitat rather than species, and weighted towards habitats such as deciduous woodland rather than cropland which is considered of low-ecological value and subsequently being lost. This could have devastating consequences for the significant populations of UK declining field bird species such as Lapwings, Linnets, Yellowhammers and Skylarks observed on the Capel farmland.

Looking at the 'Biodiversity Evidence Base Update of February 2021' it is apparent that the 'desk-based' reviews, which at the moment appear to be the only ecology assessments of the area, have only used data up to 2018. Since then many local residents have recorded sightings of flora & fauna. The KMBRC themselves also state "...the lack of information for a geographically defined area does not automatically imply a low biodiversity value for that area: it may simply be under recorded." Taking into account the use of out of date data and the likelihood of 'under recording' of flora & fauna, the initial baseline that Ecologists will be using to calculate the biometric and consequently the 10% biodiversity net gain, will not be a true reflection of the biodiversity at East Capel.

Many of the bird species recorded by the Kent & Medway Biological Records Centre (KMBRC) in the East Capel region are 'red-list' Birds of Conservation Concern and some of 'Principal Importance'.

The preliminary desk-top assessments on ecology concluded the following:

"Phase 2 Surveys: Surveys for protected and notable species potentially present within the Site and detailed botanical surveys (potentially including hedgerow and woodland survey) will be required to establish the ecological baseline for the site. Surveys are seasonal and should be completed early in the project programme to ensure pertinent information is available to inform masterplanning"...and;

"Master-planning Input: In order to protect key ecological resources and demonstrate biodiversity net gain, early ecological input to the scheme design is needed to ensure suitable mitigation for designated sites, habitats and species is embedded."

As yet there appears to be no on-site surveys available for scrutiny, contradictory to Stantec advice of 'early ecological input', which is necessary for demonstrating biodiversity net gain. Apparently the comprehensive Environmental Impact Assessment is not required until the Planning Application stage. This must be fundamentally wrong with development on this scale and will surely contribute to the worldwide loss of species.

The removal of and disturbance of habitats is contrary to the following policies and worldwide agreements:

- . The Tree Health Resilience Strategy 2018 to increase and encourage healthy woodland.

- . DEFRA's Biodiversity 2020: a strategy for England's wildlife and ecosystem services aims to '...halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks.'

- . The Global Agreement for the halt of biodiversity loss 2010–20 set an ambition to halt overall loss of England's biodiversity, and is mirrored by the

- . EU Commission's Biodiversity Strategy 2010–20 and the UN Convention on Biological Diversity: Strategic Plan Targets for 2020.

The NPPF Paragraph 175.(C) states ‘ development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be REFUSED, unless there are wholly exceptional reasons AND a suitable compensation strategy exists.....

The area at East Capel has ancient woodland, old hedgerows and streams supporting a myriad of wildlife including protected species such as Great Crested Newts, Dormice and Bats. There is little detail yet of the planned mitigation measures to protect these species. The Durrell Institute of Conservation and Ecology question the delivery of Biodiversity net gain and the ability to hold developers to account in their words ‘unfortunately, our analysis also shows that the governance might not be there to

Ensure these promises are kept for habitats delivered within the footprints of proposed development’ . There is no mention by TWBC in the PSLP of a governance mechanism in place to ensure biodiversity is monitored and achieved.

Taking into account all the above factors the TWBC promise of a 10% increase in biodiversity on site is unrealistic. For this reason the PSLP is unsound.

Question 6

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The harm to the Green Belt and biodiversity as well as the increase risk of flooding within the East Capel allocated site outweigh the questionable ‘exceptional circumstances’ that TWBC have used to justify its inclusion in the PSLP.

The allocated site at East Capel should therefore be removed from the plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_132

Comment

Agent	Mr Jonathan Buckwell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	DHA Planning Ltd
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Consultee	[REDACTED]
Company / Organisation	Inter-Leisure Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Inter-Leisure Ltd [REDACTED]
Comment ID	PSLP_1989
Response Date	02/06/21 15:17
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	DHA Planning for Inter-Leisure Ltd full representation and SI.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Inter-Leisure Ltd
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: the full representation attached has been divided between Policy STR/PW1 (PSLP_1988), Policy STR/SS1 (PSLP_1989), Vision and Objectives ((PSLP_1990), Policies STR1 (PSLP_1991), STR3 (PSLP_1992), STR4 (PSLP_1993), EN1 (PSLP_1994), EN3 (PSLP_1995) and ED2 (PSLP_1996)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Inter-Leisure Ltd in respect of the Tunbridge Wells Borough Council Pre-Submission (Regulation 19) Local Plan (PSLP) consultation.

1.1.2 These representations relate to land at Paddock Wood Garden Centre that forms part of the proposed strategic expansion area of Paddock Wood.

1.1.3 Based on the current national and local planning context, we consider this the site to be suitable for development.

1.2 The site

1.2.1 Our client controls Paddock Wood Garden Centre, Maidstone Road (herein 'the Garden Centre' or 'the Site') and it was promoted for development through the response to the Regulation 18 draft Local Plan. It is available for development and will contribute toward meeting identified development needs.

1.2.2 The site is an established and operational retail Garden Centre located on the northern periphery of Paddock Wood (see figure 1).

[TWBC: for Figure 1 Location of Paddock Wood Garden Centre see full representation attached].

1.2.3 It consists of a mix of hardstanding, permanent buildings, glass houses and temporary structures. It constitutes previously developed land but is situated outside of the existing Tunbridge Wells 'limits to built development' ('LBD'), but within the new LBD as proposed in the PSLP.

1.2.4 The site is not located within the Metropolitan Green Belt or within an Area of Outstanding Natural Beauty.

1.2.5 The site falls within the administrative area of TWBC, albeit close to the borough boundary with Maidstone Borough Council, which is demarked by Wagon Lane.

1.2.6 The existing built up area of Paddock Wood is located approximately 400m to the south of the site, whilst the town centre is situated approximately 1km in the same direction. Immediately north of the site is a commercial plant hire yard, whilst railway station is Paddock Wood (1km) to the south.

1.2.7 We have included an illustrative masterplan with this representation (Appendix 1) to show how the site could be developed to provide additional retail provision to support the new housing and employment uses proposed. An extract is provided below for ease of reference.

[TWBC: for Figure 3: Illustrative site layout plan (Appendix 1) see full representation attached].

1.2.8 The proposals highlight the potential to provide additional comparison or convenience retail development (circa 1,895 sqm) by making efficient use of the extensive and underutilised parking areas.

1.2.9 The site could also be made available for other employment generating uses should there be a greater unmet need.

1.3 Local Plan Background

1.3.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.3.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3.3 This submission comments on the plan having regard to these tests of soundness as well as wider legal compliance.

1.4 Legal Compliance

1.4.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.4.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.4.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.5 Assessment of Soundness

1.5.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as all new development.

1.5.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.5.3 This representation comments on the following elements of the plan:

• Vision and Strategic Objectives; • Development Strategy and Strategic Policies; • Place Shaping Policies; and • Development Management Policies.

Place Shaping Policies

1.5.17 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

Policy STR/PW 1

1.5.18 Policy STR/PW 1 sets the Strategy for Paddock Wood and states that approximately 3,490-3,590 dwellings and accompanying infrastructure will be delivered via the planned extension to Paddock Wood.

1.5.19 Policy STR/SS1 sets the detailed strategy and states, amongst other things:

[TWBC: wording of Policy STR/SS1 duplicated here and Extract of proposed proposal map for Paddock Wood - see full representation attached].

Comments in relation to Paddock Wood Garden Centre

1.5.20 Inter Leisure **SUPPORTS** the inclusion of the site within Paddock Wood strategic growth area, and its identification within the Strategic Sites Masterplanning and Infrastructure Main Report, where it is shown on Figure 2 as a potential allocation site for new retail/employment, and is described throughout the document as being a “draft allocation”.

1.5.21 The Council’s Site Assessment Sheets note that the site is outside, but well connected to the Limits to Built Development. It is noted as being previously developed land providing commercial uses, and concludes that it is suitable for the continuation of this use, whilst making more efficient use of the site where the opportunity arises. It is therefore concluded to be suitable as a potential Local Plan allocation.

1.5.22 The PSLP no longer proposes to include individual site allocations within the strategic development area, and so the site is no longer proposed as a specific allocation. The Policies Map does however show the site to be contained both within the strategic development area and the provisional Limits to Built Development as shown below.

[TWBC: for Policies Map extract see full representation attached].

1.5.23 My client **SUPPORTS** in principle the employment proposals for Paddock Wood and confirms that in relation to this site, it is deliverable for additional retail and/or employment uses over the plan period. My client’s proposals will help to deliver additional high quality employment in the manner envisaged, including a mix of employment types and sizes in order to support the balanced economic and employment growth of Paddock Wood.

1.5.24 In particular, my client **SUPPORTS** the inclusion of the Paddock Wood Garden Centre site within the proposed Policy STR/SS1 allocation and within the Provisional Limits to Built Development as shown on the Policies Map.

1.5.25 However, whilst the aims and objectives of the policy as a whole are fully supported, the policy as drafted makes no reference to the site itself, or to proposals for employment uses outside of the proposed new employment areas at Lucks Lane and Transfesa Road, my client **OBJECTS** to the current policy wording. This objection could be overcome either by specifically identifying the clear in the text that employment and small scale retail proposals would be acceptable at other locations within the strategic allocation, including at the Paddock Wood Garden Centre site.

1.5.26 Inter-Leisure also **OBJECTS** to Map 28 in that it does not carry across the proposed identification of this site for employment use as shown on all four of the Structure Plan options set out in the Strategic Sites Masterplanning and Infrastructure Main Report. Given that there appears to be full agreement

in all of the background documents that the site is suitable for such development, there is no clear reason as to why this designation has been removed on Map 28.

1.5.27 It is also noted that Map 28 is incorrect in that the site has been excluded from the development boundary, which is inconsistent with the draft Policies Map and the Strategic Sites Masterplanning and Infrastructure Main Report. It is hoped that this is simply a drafting error, but it needs to be addressed satisfactorily in order for us to be able to remove our objection.

1.5.28 Finally, whilst the benefits of Design Review are recognised, and we do not object to the use of Design Review Panels being encouraged through policy, we do question whether their input at both the pre-application and post-submission stages for all applications within the SS1 masterplan area should be mandatory in all cases, regardless of the scale and nature of the proposal – which appears to be the case as Policy STR/SS1(5) is currently worded. For example, in this case the amount of development proposed would be relatively modest, and Design Review would not normally be required for proposals on this scale. This aspect of the policy should be re-worded accordingly.

1.6 Summary and Conclusions

1.6.1 In summary, this representation has been prepared on behalf of Inter Leisure Ltd in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.6.2 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, but we require amendments to the policy wording for policy STR/SS1 and to Map 28 to make it clearer that retail/employment development is supported at Paddock Wood Garden Centre.

1.6.3 We also object to the detail of some of the development management policies as set out above, which we are concerned unnecessarily replicate the NPPF, whilst providing detail which could have the unwanted side effect of unnecessarily limiting and frustrating beneficial development.

1.6.4 Finally we object to the wording of Policy ED2.

Question 6

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_38

Comment

Agent	Mr Roger Nightingale [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Kember Loudon Williams
Address	[REDACTED] [REDACTED] ROYAL TUNBRIDGE WELLS [REDACTED]
Consultee	Sam Jackson [REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Sam Jackson [REDACTED]
Comment ID	PSLP_566
Response Date	28/05/21 10:24
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_566_site_location_plan.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr Sam Jackson
Question 2	
Agent's Name and Organisation (if applicable)	Kember Loudon Williams
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective

Question 5

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The plan as drafted contains an anomaly with respect to the allocation of land for development at Paddock Wood that means that it is not 'sound'. This anomaly relates to the precise position of the boundary for the proposed development east of Paddock Wood. Firstly, the proposed allocation excludes a small area of land fronting Queen Street that has recently been the subject of a planning application for residential development and which should clearly be included in the overall allocation. Excluding this area of land creates an unfortunate anomaly in the development area, and it would be much better if it was included so that the whole area can be developed in a properly comprehensive way. The owners of this land are fully supportive of it being included in the development area. The area in question is shown on the location plan submitted with this form. [TWBC: see site location plan attached].

Secondly, one of the maps in the draft plan (Map 27 - Masterplan Area) does actually include the land referred to above in the development area, whereas the other indicative maps in the plan exclude it. This is clearly an anomaly that means that the plan is not 'sound' and needs to be amended. It would make much more sense to include it so that the whole area can be dealt with comprehensively, and this unfortunate exclusion is avoided.

For office use only

New Site Submission? Enter site address

The Brackens, Queen Street, Paddock Wood

Question 6

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Please see comments in section 5 above.

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Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Mr Roger Nightingale [REDACTED]
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Address	[REDACTED] [REDACTED] ROYAL TUNBRIDGE WELLS [REDACTED]
Consultee	Sam Jackson [REDACTED]
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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Katharine Jones [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Katharine Jones [REDACTED]
Comment ID	PSLP_1111
Response Date	03/06/21 15:35
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Katharine Jones
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident in Five Oak Green for 20 years, our 3 children have been born in this time & we have a strong connection to the local community. During lockdown it became all too clear how much through-traffic usually comes along the one main road when the road was deserted. Traffic is now back up to the usual peak & in the 20 years we have been here it is noticeable how it has increased. Even with a small village school here there is considerable disruption either end of the school day with additional cars parked along the road. This will only increase with the proposed development and this is of huge concern to me. Not least because of the increase in population but also due to the lack of planned infrastructure.

It concerns me with the volume of housing proposed how badly the air quality will be permanently affected from an increase in the number of cars & increased population alike. We all saw the effect lockdown had on air quality & this planned development of disproportionate amount of houses will see a permanent & irreversible change in our climate & our environment not only to us as residents but to the animal & plant population too. TWBC has a duty to maintain the bio-diversity of our land. With this proposed development, there is none.

There is also the devastating amount of light pollution from this vast number of houses to consider too.

I have severe concerns over increased flood risk with this development. There is no doubt that with a development of this size the risk of flooding will be heightened. We will also be part of a much larger urban sprawl linking Paddock Wood, Five Oak Green, Tudeley & Tonbridge. There is no consideration to the loss of greenbelt & productive farmland. In a time when as we leave the EU we need to consider being more self-sufficient with our land, surely we should be using our farmland for the purpose it's intended to provide crops & not give it up for poorly considered housing.

There is also no affordable housing. In fact, my own children who have lived & grown up here will not be able to afford to live here. They will be forced to look to live elsewhere in favour of those who are able to buy into the county from the larger cities.

TWBC have considered no alternatives to this site but have selected the 'easy' option of negotiating with just one landowner. This is lazy & is not showing a duty of care to the current residents of the borough. Meanwhile, Tunbridge Wells town centre is falling on its knees with empty shops & lack of focus on regeneration. This housing development is not sustainable & is unsound.

Question 7

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Comment

Consultee	Linda jorden [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Linda jorden [REDACTED]
Comment ID	PSLP_264
Response Date	22/05/21 21:01
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Linda Jorden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1 Paddocke Wood and East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

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I am 61 years old and lived in the parish most of my life, my father was born in Tudeley and lived all his life there, I went to school at Capel. I bought a house on the Whetsted Road at Stone Castle in 1985 and feel able to comment on the effects that further building will have in this area.

Roads - even back in 1985 this road was fast and busy. It is the link between the two main hospitals and also Maidstone and Tunbridge Wells. Even back in 1985 the slightest hold up on Colts Hill (dustbin men, broken down car) lead to major tail backs and congestion. Nowadays with the increased use of the road, no road improvements, more houses in Maidstone and Tunbridge Wells the road is always blocked at the hopfarm at rush hour and Colts Hill comes to a standstill every time two lorries meet.

The road between Paddock Wood and Tonbridge is always busy, now that Paddock Wood has grown into a town you have to take your life in your hands just to cross the road anywhere in Five Oak Green. There are very few footpaths and the bus service is dreadful, hence people are forced into using their cars.

Quarry - There was NO quarry when I lived there, now not only is there a quarry, but plans are afoot to increase the quarry and up to 100 HGV's will be using the already congested road daily. This is again destroying the farm land and wildlife habitats.

Farm Land - This area has always been good farm land, hence the hop farm (which was a working farm when I was a child), it grew and dried the majority of hops for the Whitbread Empire. With the demise of the brewing industry the land was laid to cereal crops as its good fertile soil. We as a country need to grow our own food - Why build on good farming land???

Flooding - The area from the Medway down to the Hop Farm has always been flood plain, the stream at Tudeley Brook Farm also floods, as the whole of Five Oak Green has flooded why make the matter worse by building more houses, cutting down trees and concreting on land which helps soak up the water.

Sewerage - All the sewerage from Paddock Wood (which was a village and is now a large town) is pumped through Five Oak Green to the Sewerage works in Tonbridge. Nothing has been done to improve the system, even with the increase in houses. Everytime it rains hard, the pump is disabled, pumping lorries are in Five Oak Green twenty four hours a day pumping the sewerage, these lorries have their engines running day and night, another damaging environmental disaster!

Water - Where is the water for the proposed new houses coming from? None of the reservoirs have been increased, there are no new ones, and the old one in Pembury flooded our home in February last year when it became dangerously high and at risk of breaking its banks, so they allowed water to flow out, flooding 29 homes in Five Oak Green.

Brown Field Sites - There are so many Brown Field sites in the borough and so many empty shops, the old cinema site, John Lewis site and many more around Tunbridge Wells which would be perfect for housing, instead they are going for the easy option, using virgin farm land!

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Comment

Consultee	Delwyn Kay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Delwyn Kay [REDACTED]
Comment ID	PSLP_1208
Response Date	04/06/21 11:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Delwyn Kay
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1 for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My family and I have lived in East Peckham for nearly 19 years now, my school aged children attend local schools, they have to travel for secondary school (as do all children that age from our village). I work in mental health NHS services that require me to travel to Tunbridge Wells to my team base and around South West Kent to provide community services to local residents.

I am concerned about the prospect of this proposed massive development in East Capel and the demand that will place on our local services (GP, schools - esp secondary schools, roads, NHS). There is traffic congestion around this area now, esp at peak hours and even despite the covid restrictions currently in place. If this development goes ahead this will make it very difficult for villagers in East Peckham to travel to their work and schools as the congestions points will be on small lanes. Additionally the plan funnels traffic into certain limited routes that will make trip times and distances excessive for us here in East Peckham, easily doubling times and inconvenience and making it harder for us to travel locally into Paddock Wood, Tonbridge, Tunbridge Wells and to access the A21. There are plans to block the route for us to South Tonbridge and the A21, where the majority of secondary schools for our girls are. The congestion will add to local pollution and inconvenience for current residents. Might I suggest the proposal of blocking roads such as Hartlake to solve congestion for current residents is a poor and simplistic solution, compared to changing the housing plan to provide smaller sympathetic housing developments, in a wider range of places that can be integrated into villages and towns and not place undue demand on the local facilities of neighbouring councils, at the expense of local council tax paying residents of Tonbridge and Malling.

Using green belt and farming land for the purposes of housing is not in keeping with local residents wishes and the national and local plans for that type of land use. Using current town and village edges and brown field should be the first and main housing option.

It is already difficult to get a GP appointment at our local surgery in Paddock Wood and for our children to obtain places and to travel to Tonbridge comp and grammar secondary schools. This will only worsen for our village if there is a development of thousands of houses between our village and our GP surgery and also the schools. This will therefore restrict access of current local residents to facilities if the new development goes ahead. Local services need to be able to provide facilities to its current residents and this will be impeded if this proposed plan goes ahead in its current state. The idea that more schools and GPs will be provided is unlikely, similar developments in other local areas have not been able to attract GPs and the demand has continued on the existing surgeries (such as at West Malling) and that schools are not built for many years down the track, affecting current residents in the meantime.

This area is prone to flooding and the degree of flooding will only increase into East Peckham with the degree of building work that is proposed for East Capel. Given global warming will only increase wet weather and the prospect of flooding here, it is unacceptable to increase this risk to East Peckham by

building such a large development in at this site. We all understand the need for housing, but not at the expense of flooding downstream to other neighbours.

There will be increased travel to Paddock Wood for trains, GP and schooling in addition to the increase demands on Tonbridge. This is a small town, that is already seeing increased demand on facilities with its current in progress building works. This town is not resourced to have even thousands more families trying to access facilities. The pollution and congestion for local residents and small surrounding villages will be bad.

This plan will change the nature of the villages and towns in its vicinity by utterly changing Capel village to a town, Tudley hamlet to a town and soon enough linking Paddock Wood to Tonbridge and utterly changing this rural area into one large residential town.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_62

Comment

Consultee	Charlie Keeling [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Charlie Keeling [REDACTED]
Comment ID	PSLP_1044
Response Date	03/06/21 09:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1044_C_Keeling_SI.docx
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Charlie Keeling
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east

[TWBC: This representation has been input against Policies STR/SS1 & STR/SS3 – see Comment Numbers PSLP_1044 and PSLP_1055]

[TWBC: Representation attached as supplementary information as tables used by respondent]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Executive Summary

There is much detail laid out in this submission objecting to the development of the two so-called Strategic Sites at Tudeley Garden Village and East Capel, as part of Paddock Wood. To be helpful I have summarised the major points, against the listed Policies in the Plan:

- . **Policy STR2 – Place Shaping** - Forcing almost 50% of the Borough's Housing Needs on to 2% of the Borough's Population, who are represented by one, out of 48, Councillors. Little or no account taken of the severe Infrastructure impacts on the two neighbouring Councils Tonbridge & Malling (TMBC) and Maidstone (MDC).
- . **Policy STR3 – Brownfield** - an overly negative approach to the locations of the sites and their ability to be developed into sustainable housing developments, given their existing land use and infrastructure.
- . **Policy STR5 - Infrastructure and Connectivity** – I have focused on Schooling, Medical Facilities and Provision of (basic) Utilities. Transport Infrastructure comments are in STR6 – Transport and Parking
- . **Policy STR6 - Transport and Parking** – After setting the context I have set out the current road infrastructure status and issues, the proposed mitigations in the PSLP to deal with them, and finally, comments on the proposed mitigations.
- . **Policy STR9 - Green Belt** – A general statement regarding the Green Belt, with reference to the Site Allocations Plan in 2016, with comments from the Inspector who reviewed it
- . **Policy STR/SS1 - Strategy for Paddock Wood and East Capel** – I have put in two submissions one for STR/SS1 and one for STR/SS3
- . **Policy STR/SS3 - Strategy for Tudeley Village** - I have put in two submissions one for STR/SS1 and one for STR/SS3
- . **Policy TP1 - Transport Assessments etc** – for such important Strategic Sites the level of Transport Assessments is woefully inadequate. They are based on over-optimistic, i.e. too small a number, of trips, modal shifts are unrealistic, very little, if any, evidence of KCC's input, agreement or approval, and flagrant disregard of the impact of TMBC and MBC's own plans and how that factors into the Transport Assessments.

More Detailed Information

Policy STR2 – Place Shaping

The original Issues & Options SA identified 6 growth strategies (“GS”), none of which mentioned Tudeley/Capel specifically as a site for a potential garden town. GS5 was described as “New freestanding garden settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough.”

The preferred option at this point was “the A21 Growth Corridor”, where large scale investment in Infrastructure, dualling the A21, had already taken place by KCC.

Then, just prior to the Regulation 18 Consultations GS5 was adopted by TWBC with Strategic Sites at Paddock Wood/East Capel, and Tudeley Garden Village, as the nominated sites. This was a real “rabbit out of the hat”!

Please see the table below as indicators of why the Place Shaping was, and remains, wrong.

Parish/Ward

% of Population of TWBC

% of Housing Allocation

Number of Councillors

Capel PC

2,400 – 2%

4,200 – 45%

1

Paddock Wood TC

4,100 – 21%

2,400 – 21%

3 (+1 absent)

Total for Strategic Sites

6,500 – 23%

6,600 – 66%

4

Rest of TWBC

112,250 – 77%

2,747 – 34%

Total for TWBC

118,750

9,347

48

I feel this Table represents a very unfair allocation of housing needs to one area of the Borough, and one that borders on Tonbridge & Malling Borough Council (TMBC). This analysis results in:

- . 45% of the housing need being imposed on 2% of the Borough's population.
- . 66% of the housing need being imposed on 21% of the Borough's population.
- . These wards are represented at the "Council Chamber" by 9% of the TWBC Councillors
- . The major impact of these proposed developments will be felt in Paddock Wood (part of TWBC) and TMBC as these are the two centres which attract residents and traffic for:
 - . Commuting
 - . Shopping
 - . Schools
 - . Medical Facilities
- . Paddock Wood already has a significant level of new housing developments in progress. They are already causing issues with Traffic Congestion, Flooding, Sewage etc. And they don't meet affordability targets.
- . Similarly, Tudeley and East Capel suffer from Traffic Congestion, Flooding and Sewage.
- . TMBC are having a massive infrastructure problem and cost dumped on their doorstep. TWBC get the Council Tax, TMBC get the hassle and cost!

Finally, the vast majority of the development proposed in for the two strategic sites is:

- . Metropolitan Green Belt – with good classification of the quality of the agricultural land. To build over this land would be a travesty, reducing the country's ability to produce fruit and other arable produce, and creating settlements which will have an adverse impact on the landscape and environmental aspects of this area of Kent.
- . Flooding – a lot of the proposed development areas for the two Strategic Sites are either officially on the Flood Plain or have been subject to severe flooding episodes over the relatively recent past. I would have thought it likely that Home Insurance providers could adopt an aggressive, or expensive, attitude to providing cover in these circumstances. As a result, potential developers will also react negatively to this challenge.

In summary, this Local Plan is so skewed to development in a currently tranquil, beautiful, and highly food-productive, area, in the Green Belt, subject to flooding, with massive infrastructure issues, and on the doorstep of the neighbouring Borough Council who will end up bearing the brunt of the issues this will cause.

Policy STR3 - Brownfield

The reviews that TWBC have carried out on Brownfield sites appear to have adopted an overly negative approach to the locations of the sites and their ability to be developed into sustainable housing developments, given their existing land use and infrastructure.

I am aware that Save Capel carried out an extensive analysis of potential Brownfield sites, ahead of the Regulation 18 Consultations, which demonstrated that the volume of houses being proposed in

Capel parish could be easily accommodated by Brownfield developments. Sadly, as with the majority of other Regulation 18 comments/challenges TWBC chose to ignore them.

Probably the main opportunity for a Brownfield development exists at the former Blantyre House Prison site. It is a large site, not in the AONB or Green Belt, with Infrastructure services already installed. It's rejection by TWBC on the basis of there only being minor roads, and therefore significant investment would be required for transport infrastructure, pale into insignificance compared to the transport infrastructure of the Tudeley and Paddock Wood/East Capel sites (see comments below on other Policies relating to this topic.

Whilst not a Brownfield development issue, one of particular relevance from an alternative site's perspective, is the Castle Hill Developments proposal to create 1,600+ homes which are in the favoured "A21 Corridor" option. Whilst the proposed development is in the AONB it has much better potential from sustainability and infrastructure perspectives. This was rejected "out of hand" with little or no analysis by TWBC.

Additionally, TWBC have recently approved a very large Commercial Development at Kingstanding, which was also in the same AONB area. This has great employment potential, but leads one to wonder why a Commercial Development is acceptable in the AONB but a respectful (to Sustainability) Housing Development isn't?

Policy STR5 - Infrastructure and Connectivity

Introduction

The proposed developments at Tudeley Village and East Capel (now, apparently part of Paddock Wood) will bring significant pressure and issues in other Infrastructure areas, especially:

- . Schooling
- . Medical Facilities
- . Provision of (basic) Utilities

Before considering each of these in turn, please review the following new population projections as context. These are based on an assumption of 2.26 people per household (a usual UK Metric) and using the metric of 0.285 children per household as part of that:

Projected Population Growth

Capel

Tudeley Village

Capel Parish

Adults

5,500

4,500

10,000

Children

2,200

1,800

4,000

Total
7,700
6,300
14,000

Projected Number of Extra Vehicles

3,500
2,500
6,000

This swamps the existing population of Capel Parish which was 2,400 at the previous census. So where will all these extra go for schooling, medical facilities and how and when will basic utilities be delivered to this staggering number of people.

Schooling

For the 1,800 children from Tudeley, the plans to meet the educational needs of 2,200 children from East Capel seem inadequate.

Proposals in the Plan, including Paddock Wood are:

- . New secondary school to serve Tudeley Village, potentially up to 1,000 pupils.
- . Expansion of Capel Primary School by 1FE.
- . Extension of Mascall's Academy by 1FE from 2021.
- . Two new Primary Schools in Paddock Wood, providing 4FE.

The Tudeley secondary school of perhaps 1,000 pupils and expansion of the small Capel primary school will be woefully inadequate, and particularly so if both development plans proceed. The new secondary school is not planned to be built until Phase 4, or after 1,900 houses have been built!

The remaining children totalling up to perhaps 2,000 will need to be driven or bussed daily to either Tonbridge or Tunbridge Wells (at least 50 or 60 buses twice or more each day). The planned provision for nurseries is similarly inadequate.

There is an incredibly strong, existing, demand for places in the good local schools in Tonbridge and Tunbridge Wells. It is naïve to think that some 2,000 pupils will somehow be absorbed in the existing schools in these two towns; in practice many pupils will have to be driven or bussed far away to Maidstone or Sevenoaks, all adding to traffic and congestion. In reality, another two or possibly three large schools will need to be built by KCC if both projects proceed. The key issue is when the schools will be built and ready to take pupils.

There will inevitably be children with special needs, the cost burden of which will fall on KCC and TWBC. In practice, TWBC will simply be imposing these education costs elsewhere, displacing the education of children in other Boroughs and creating congestion, particularly in Tonbridge and Tunbridge Wells.

The plans make no assessment of these education and congestion costs or whether KCC can or will agree to fund these new schools and so are unsound.

Medical Facilities

Regardless of whether one or other or both projects proceed, the number of new residents will necessitate new healthcare facilities, the plans envisage one new GP surgery which will be particularly busy and will require some 6 to 8 doctors plus support staff. If both proceed, there will be 14,000 new residents ultimately requiring these healthcare services.

There will also be considerable extra pressure and costs imposed on Pembury Hospital which is already strained. As stated in the plan, a significant number of the adults are likely to be over 65 and elderly, some with special needs and as they age, increasing demands will be made on local health services.

The same will apply to the up to 4,000 children. All of this will impose significant additional and increasing social services costs on TWBC and medical provision costs on the local Health Trust.

Additionally, there is little information in the Plan about the timing of the creation of the new medical facility. Until that is planned, approved, and developed, whatever proportion of the 14,000 new residents are living there before then will need to access medical facilities elsewhere. This will probably fall on to Tonbridge where medical facilities are already stretched. **Another example of TWBC passing their problem on to someone else, TMBC in this case.**

The plans do not properly address these issues nor quantify these costs so are unsound, inadequate and will impose potentially large contingent costs on TWBC.

Basic Utilities

Electricity, Gas and Communications

As no new houses can be connected to the gas grid from 2025, the two developments will need to be powered entirely by electricity. This will require extensive investment in major HV transmission lines and stepdown transformers, particularly as new EV charging infrastructure will be required eventually for some 6,000 cars given that petrol and diesel cars will be phased out after 2030. All the cables will need to be buried. This is a major engineering task in addition to road building, road widening, school building, GP surgery, sports facilities etc. The Tudeley plan budgets £11.5m and the Paddock Wood/Capel plan budgets £10.8m solely for electricity connections and diversions with no discussion about grid infrastructure or who pays for these or how construction will be phased. In the experience of experts, we have consulted, the cost of the grid infrastructure and substations will be many £millions and will not be installed for several years. FTTH broadband will be relatively more straight forward to install.

The plan is unclear on this important aspect and so is unsound as a result.

Waste Disposal

The disposal of waste from up to 6,250 new homes will require TWBC and KCC to invest in more waste disposal facilities. This will create yet more heavy vehicle movements on already congested roads and add to the waste already trucked away from North Farm. These additional costs do not seem to be factored into the plans and will be a charge on the annual rates which would rise slowly over time to a total of some £10m once all 6,250 homes had been built.

In Summary

The PSLP documentation is woefully inadequate on any of these topics. The views and agreement of KCC are absent from these Plans. There has been no visible Master Planning for Utilities for the Tudeley Village proposal, and what is there for Schooling and Medical Facilities falls very short of the mark of a justified, fully costed and risk-managed Plan. **For all of these reasons the Plan is unsound.**

Policy STR6 - Transport and Parking

Context

Capel Parish's geography and existing transport infrastructure heavily-constrains planning sustainable development for the future. This is recognised in many parts of the PSLP ('the Plan') and supporting evidence. The Plan and its 'key diagram' (Appendix A of the Plan) make it very clear.

- . The only Trunk Road in Capel Parish is the A21 through the west of the parish serving London/M25 to Hastings, running east of Tunbridge Wells through the Borough.
- . There are two other "A" class roads relative to Capel Parish: a) A26 Tonbridge to near Maidstone, borders Capel Parish at Tonbridge to the west & follows the river Medway valley north east partly bordering Capel. b) A228 (northwest/southeast through Capel Parish) links M2 & M20 London-Dover motorways & the North Medway towns to West Malling, Paddock Wood, A21 & Tunbridge Wells. A major highway traversing Capel.
- . There is only one railway line in the Parish, but no stations. The two nearest stations are Tonbridge serving London/Hastings, London/Dover/Ramsgate, Tonbridge/Redhill. Paddock Wood is on the London/Dover line with an irregular country line between Paddock Wood/Maidstone West.
- . Bus services are 'patchy and infrequent in rural areas' (and almost non-existent after 7pm).
- . The local road network has severe constraints; Much of the infrastructure is rural and narrow and therefore unsuitable for HGVs. The impact of large and many foreign HGVs, on communities in the area, presents a major, existing and continuing challenge.

- . New quarrying will create 120 HGV movements per day through the access point in Capel onto A228 and impact all roads in the area.
- . Capel Parish's only "B" road B2017 links Paddock Wood to Tonbridge via Five Oak Green & Tudeley. There are also a number of Kent County Council designated "country lanes" used as "rat runs" with HGV traffic, many foreign.
- . There are a number of industrial estates, haulage and distribution yards that have evolved on old farmsteads throughout the area using country lanes.
- . All "main" roads are heavily trafficked, especially in the morning and evening peak periods.
- . The A228 in Capel is now recorded as "the busiest road" in the whole of Tunbridge Wells Borough by the TWBC traffic consultants.

This is the context against which all new development put forward in the Plan should be considered. Save Capel (SC) has reviewed the large number of references to the subject of transport in the Plan and supporting documents and have appointed expert advisors to assist us. 'Mitigation' of the significant impacts, particularly of increased traffic, is offered by Tunbridge Wells Borough Council (TWBC) in the context of developing the Strategic Sites (SS) at Tudeley Village and East Capel/Paddock Wood.

SC's review shows that the treatment of transport in the Plan is inconsistent and the result is unsustainable making the Plan itself unsound.

Impact of the Plan on travel at peak periods on the existing transport and roads infrastructure

Motion Consulting have also submitted their report in the evidence base for Regulation 19. This is based on the Traffic Modelling in the Plan and also Motion's own knowledge base of similar proposed developments.

In summary, the impacts are as follows:

Class of Road

Including

Roads Detail

RAG

"A" Roads

A21

ALL flows will increase due to traffic joining/leaving at the Tonbridge (Vauxhall) Roundabout to/from the East. This road was dualled between Tonbridge & Pembury in 2018 but suffers severe bottlenecks at the southern end, Kippings Cross where the dualled A21 ends. Longer delays expected with increases in housing from Paddock Wood.

Yellow

Circle

A26

Unacceptable increases in traffic from the South/East at Somerhill A26/B2017 Roundabout and on to Vauxhall A21 Roundabout to the West and into the Tonbridge Industrial Estate to the East. Long delays.

Red

Circle

A228 Colts Hill

Very high increased traffic flows at all junctions joining the A228. A228 at Colts Hill has been the subject of discussions about a bypass for 40+ years. **The Alders Road/Crittenden Road junction is a notorious accident black spot.**

Red

Circle

A228 Beltring

B2160 roundabout junction

Queuing traffic most of the day at the 3-spur roundabout. Main junction to reach Paddock Wood industrial areas.

4th spur is access to The Hop Farm – huge park & events centre 000s of vehicles at some events.

Yellow

Circle

“B” Road

B2017,

Badsell Road/ Five Oak Green Road/ Tudeley Road

B2017 (cont)

A typical old “B” road. The only direct route west from Paddock Wood, at the junction of the B2160, to Tonbridge & A21. Running through East Capel to A228 then Five Oak Green, Tudeley & A26/A21 Tonbridge. Overloaded, no HGV restrictions or traffic calming at all. The B2017 is already very busy at peak times and has 3 accident black spots.

Due to long delays at A228/A264 Pembury, this is used as main route to Tonbridge & A21 heading Northwest. Commuter traffic uses this road to egress many other villages east of Paddock Wood & as far south as Hastings via other rat-runs to avoid delays on A21 south of Kippings Cross.

The B2017 cannot take any more traffic.

Red

Circle

Minor Road

Crittenden Road/ Alders Road

A very narrow, winding country lane used as a rat-run linking Matfield area & further east & south to B2017 at Crockhurst Street then on to Tonbridge & A21. Crosses A228 at Colts Hill. Used by traffic avoiding the A21 long delays at Kippings Cross especially during commuter times and weekends.

Red

Circle

Minor Road

Hartlake Road (part of which is TWBC, and part of which is TMBC)

In parts a narrow, winding road, used as a through route & rat run to avoid delays at Tonbridge and/or A228 which are severe at peak times. Often cars parked by the bridge over the Medway for fishermen and ramblers.

Red

Circle

Sherenden Road

A very narrow & twisting lane running from Hartlake Road near the very popular Poacher & Partridge pub/restaurant, past Bank Farm Stables and through to the B2017 Five Oak Green Road. Blind junction on B2017. This will form part of the proposed Tudeley Garden Village TGV.

Yellow

Circle

Sychem Lane

A country road, very narrow and winding, linking Five Oak Green to the hamlets of Redwood Park, old Capel & Alders Road. If the Five Oak Green bypass is built this road will be closed to through traffic.

Unacceptable to local residents.

Red

Circle

Whetsted Road

Branches off to the North East at centre of Five Oak Green to link up with the A228, midway between B2017 & B2160 roundabouts. Narrow and winding residential road, no pavements, a narrow bridge on a blind bend. Rat-run A228/ Tonbridge to avoid Colts Hill & Pembury delays and B2017/A228 roundabout delays. The reopening quarry traffic (est.120 vehicle movements per day) will egress the A228/Whetsted Road junction. **Already an accident black spot.**

Red

Circle

[TWBC: Respondent had used red and yellow circles in above table - TWBC has replaced these with words for formatting purposes]

Mitigations as per the PSLP

The PSLP contains a number of mitigations based on Traffic Modelling carried out by two Consultants, SCANTEC and SWECO. According to our own independent Traffic Consultants 'Motion' the scenarios, and bases of the modelling would be best described "very optimistic" in terms of both numbers of journeys and mode of transport. The detail is on the Motion Report which attached to this report.

As a result, Save Capel believes that there has been a significant under-assessment of the traffic implications of the PSLP as currently drafted.

Class of Road

Including

PSLP Proposals

“A” Roads

A21

Junction re-alignment at Kippings Cross. No other mitigations planned to relate to the PSLP. There are some changes proposed outside of the PSLP regarding the new Business Park bordering North Farm Industrial Estate. This development was approved by TWBC and KCC (March 2021) despite it being in the AONB.

A26

Proposals to improve traffic flows at the junction of the A26/B2017 just below the Somerhill Schools entrance, which is currently a major disruption during peak hours. A widening of the B2017 between this roundabout & new roundabout at TGV Hartlake Road. Two lanes each way + cycleways against the existing single carriageway each way.

A228 – Colts Hill northern section

Proposal to create an “offline by-pass” to alleviate the current accident black spot at junction of Alders Road/Crittenden Road with the A228. Details regarding the A228 are not clear enough due to issues with KCC funding and impact of Tudeley Garden Village. If TGV is built then Five Oak Green bypass will be included. The southern section of Colts Hill is excluded from PSLP.

A228 – Colts Hill

Roundabout to access proposed Five Oak Green bypass which is dependent upon TGV – see later..

A228 General

There are various small schemes along A228 to support the East Capel/Paddock Wood Garden Village. Crossing points for pedestrians and cyclists are not clearly defined and are of a safety concern.

A228/B2017 Junction

3 new estates under construction in Paddock Wood (approx. 1,650 homes) outside of the PSLP, have included £870k for junction improvements to include 3 traffic lanes on the whole roundabout.

“B” Road

B2017, including Five Oak Green Road/Tudeley Road/Badsell Road

There is a proposal to build a “Five Oak Green By-Pass” to relieve the volume of traffic on the B2017 through Five Oak Green. This would be a new road from the proposed northern section of A228 Colts Hill bypass (close to Alders Road) to a junction with B2017 by the existing Capel Primary school and proposed secondary schools.

B2017/A26

There is the previously mentioned road widening proposal at the junction of the B2017 and the A26 near to the Somerhill Schools

B2017/B2160

Paddock Wood

Improved B2017 Badsell Road/B2160 Maidstone Road signalised junction near to Paddock Wood – (already started).

Minor Roads

Hartlake Road (part of which is in TWBC, and part of which is in TMBC)

Create a roundabout at the Hartlake Road/B2017 junction for TGV. Furthermore, TWBC proposes Hartlake Road be closed to through traffic where the road crosses the River Medway. Currently the road continues on to Golden Green and then to Tonbridge and East Peckham. As a result of the proposed closure of Hartlake Road the current two-way traffic flow would terminate at the bridge over the River Medway.

Sherenden Road

No mitigations known. Will be part of Tudeley Garden Village & no plans announced yet.

Alders Road

The proposed Five Oak Green Bypass is to alleviate the traffic flows on Alders Road which are currently high and will become more significant even before the Local Plan proposals go ahead due to developments currently underway in Matfield, Horsmonden & Paddock Wood. However, the PSLP notes that the Five Oak Green bypass will not proceed without TGV and so there could be no relief for Alders Road/Crittenden Lane.

There are various proposals for the design of A228/Alders Road junction, but none has yet been agreed as KCC may sponsor the whole Colts Hill bypass if they can secure funding after 2025, although TWBC & then KCC have been saying this for the last 40yrs. Residents have no confidence this will be within the timescales suggested.

Sychem Lane

Will be closed to vehicular access if TGV and Five Oak Green bypass are built, but will allow pedestrians, cyclists, and horse riders to cross the new bypass, although no mention of how.

Whetsted Road, Five Oak Green

A228 Maidstone Road/old Whetsted junction improvements.

A228/B2160 Hop Farm roundabout

Improved A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout

Comments on Mitigations

Class of Road

Including

Likely Impact & Comments

"A" Roads

A21

Kippings Cross improvement scheme

The main factor that will determine if this goes ahead is the proposed dualling of the Kippings Cross to Lamberhurst section of the A21 which has already been designed by Highways England and mentioned in parliament as a potential for the "next" round of major highways works by HE.

However, those proposals will not be decided until 2023/4.

This is the main arterial route south through part of Capel Parish and dualling of lower section of A21 to Lamberhurst & A262 may reduce some rat-running through B2017. However, roundabout junction improvements alone are unlikely to relieve rat-running in Capel as many are to avoid A21 queues north/south. New estates under construction in Paddock Wood and Matfield are likely to benefit.

A26/B2017

Roundabout

Significant remodelling of the whole roundabout and junction would be required with potential land grab. The disruption to traffic in the whole Tonbridge area and impact on Five Oak Green and Paddock Wood would be immense and this is not accounted for in the PSLP. There are no alternative routes in this area as they are already being overloaded. One alternate could have been Hartlake Road, but the PSLP is closing this to through traffic.

The impact on the very successful Schools at Somerhill will be significant, but as the Schools are effectively tenants of the Hadlow Estates Developer it is unlikely that they will raise objections.

A228

Colts Hill Bypass – after 40 years with no approved proposals what is KCC's views on the proposed mini-Bypass? It makes little sense to dig half a hole from both a cost and disruption basis!

Why build half a road and introduce more very difficult and dangerous junctions halfway up a hill and keep the narrow bends to the north of Alders Road used by hundreds of HGVs daily? It is just moving the accidents elsewhere; it does not solve the problems of Colts Hill. **Very Unsound.**

"B" Road

B2017, including Five Oak Green Road /Tudeley Road/Badsell Road

The proposed "Five Oak Green Bypass" has not been subject to any discussions between TWBC and the two current landowners who only found out about this proposal via social media. Neither landowner is interested in selling and therefore this proposal would need to go through a CPO process.

The bypass will cross through ancient woodland, close off Sychem Lane to traffic & isolate old Capel, Alders & Redwood Park from their village and amenities in Five Oak Green.

The Five Oak Green bypass junction with B2017 is outside of 2 schools (the existing Capel Primary School, and the proposed Tudeley Secondary School) with a potential of more than 2,000 attendees (staff & pupils).

The planners are supposed to be safety focused and I fail to see how a major new road with a junction outside 2 schools is considered a safe approach?

The new bypass will be loaded with HGVs egressing the M25/A21/Paddock Wood as it will be much quicker and use less fuel than travelling through the A21/A228 Colts Hill & Pembury to Paddock Wood & East Peckham industrial areas.

Pollution outside the schools is a major concern.

The consultant's Plans & Maps in the PSLP have incorrect speed limits shown on them for Five Oak Green and this demonstrates that this was a rushed desk top study and none of the planners actually visited Capel. One section shows Capel as being just Alders Road and it shows a picture of a "Capel" sign which is actually the hamlet of old Capel along Alders Road and **NOT** the parish sign at all.

This plan has not been thought through properly and the impact on the whole area not considered in its entirety. The attention to detail is abysmal and the whole project is **Unsafe & Unsound**.

B2017 Hartlake Road Tudeley

The proposal to create a new roundabout where the B2017 meets Hartlake Road in Tudeley also suffers from an inadequacy of space to create a roundabout.

The improvements here will depend on TGV being approved, but then we will have all this traffic hitting this roundabout whilst thousands of residents and children are commuting to work and schools.

Unsafe and Unsound.

B2017 from A26 to Hartlake Road

The previously mentioned road widening proposal from the junction of the B2017 and the A26 near to the schools at Somerhill and up to TGV will entice drivers to speed past the 3 schools' entrance at Somerhill and being on a hill drivers will take longer to stop potentially creating mayhem on the road.

A228/B2017 Roundabout

Improvements

The detail in a previously approved planning application regarding the proposed increased capacity at A228 Maidstone Road/B2017 Badsell Road (Colts Hill/Dampiers Corner) roundabout suggest 3 lanes will be used around the roundabout.

In practical terms, given we have hundreds of large and often foreign HGVs along this route daily, some pulling very large trailers, it is unlikely to improve the flow through the roundabout.

It should also be noted that the flow is from all 4 spurs and not just 1 or 2 interrupted occasionally by the others. New estates in the PSLP will create huge queues at all spurs most of the day here.

It is also of concern that the Grade II 16C Listed Mill House standing right by the roundabout will suffer serious pollution issues and the additional traffic will affect all properties next to the roundabout regarding health issues and noise pollution.

A228/B2160 Beltring

Little detail is provided regarding the proposed improvements to the B2017 Badsell Road/B2160 Maidstone Road signalised junction near to Paddock Wood but being "signalised" will create huge queues on all arms of this very busy junction.

Minor Roads

Hartlake Road (part of which is in TWBC, and part of which is in TMBC)

The proposal is to create a roundabout (as above) where Hartlake Road meets the B2017, however TWBC also propose that Hartlake Road be closed to through traffic, where the road crosses the River Medway. Currently the road continues on to Golden Green and then to Tonbridge or East Peckham. As a result of the proposed closure of Hartlake Road the current two-way traffic flow would terminate at the newly rebuilt bridge over the River Medway.

This is a rather badly thought through scheme. Planners **MUST** consider that we have a main railway line and major river running through the valley and crossings for either are very limited. By closing Hartlake road the traffic is forced to go through Tonbridge where another 6,400 homes are planned in the same period, as is a major development in Maidstone Borough Council, alongside 2,800 in Tudeley and 8,500 in Paddock Wood. **The roads are already clogged in Tonbridge due to the restricted crossing points and the whole idea of closing any crossing point is unsound.**

Sherenden Road

No mitigations proposed or plans revealed.

The Masterplanning is still unannounced.

Alders Road

The Five Oak Green Bypass is proposed to alleviate the traffic flows on this road (as well as B2017) which are currently high and will become more significant if the Local Plan proposals go ahead without inclusion of major road improvements in the area. See previous comments about the A228 Colts Hill Bypass

Sychem Lane

Closing Sychem Lane will isolate part of Capel Parish and the idea of horse riders, cyclists and pedestrians having to cross a fast bypass without a bridge is **Unsafe and Unsound.**

Whetsted Road

Improved A228 Maidstone Road/Whetsted Road priority junction. Currently, the quarrying operations here are suspended. When they re-open, as well as the increased traffic caused by the East Capel proposals, this junction will need to service 120 Quarry HGV movements per day. The junction is on a very fast bend and is already an accident black spot.

Conclusions

- 1 The impact of the sheer magnitude of additional traffic movements, as a result of building up to 5,000 new houses in Capel Parish, between Tudeley Village and East Capel, has been modelled

using very optimistic scenarios and assumptions with regard to volumes of traffic and modes of transport.

- 2 The assumptions take no account of the Local Plans being developed by neighbouring Boroughs where at least 12,000 new homes will be built. The impact of these new estates will affect the whole area.
- 3 None of the existing roads have the capacity or physical ability to absorb the increased traffic movements.
- 4 The mitigations proposed are either inadequate, unlikely to be deliverable or otherwise inappropriate, therefore they are **Unsafe and Unsound**.
- 5 The construction of any transport mitigations will in themselves be considerably disruptive, and from a timing perspective likely to be out of synchronisation with the house building programme.
- 6 Apart from minimal information about the views of KCC there are no agreed, even in outline, proposals that have been made available before the Regulation 19 Consultations.
- 7 For Tudeley Garden Village there is no evidence base that key Transport, Flooding, Other Infrastructure, Landscape or Biodiversity issues have been considered, or proposals made in the Masterplanning of TGV.

In summary, there are too many gaps in the information provided to take the PSLP to the next stage of the process. Unless these gaps can be adequately filled, through the Regulation 19 process, **we would suggest that PSLP is not sustainable and unsound.**

How will KCC/TWBC handle all of these highways works whilst the building of 8,500 homes on several sites is ongoing and the current residents are trying to go about their normal lives, without disruption.

There is a HIGH risk of ill health due to stress, air and noise pollution and the impact on the everyday lives of the existing population.

The PSLP is flawed beyond acceptability and does not take into account the health, safety and disturbance to existing residents and businesses.

Investment will not be attracted for many years due to the highways delays that are already proving a major challenge for all road users.

The direct impact upon the area for the next 20 years, whilst the new roads and 6,000+ homes are being built, is unacceptable.

The PSLP is therefore unsustainable and not sound.

Policy STR9 - Green Belt

Similar to neighbouring Borough Councils in Tonbridge & Malling and Sevenoaks, TWBC has a high proportion of the and within its boundaries which is either AONB or Green Belt. Given the housing targets "imposed" by Central Government, developing the required levels of housing, alongside the constraints of the AONB and Green Belt, provides a significant challenge to TWBC.

That said, if we look back at the Site Allocations proposals by TWBC of 2016 there are some interesting views expressed by the Inspector (Rynd Smith) who reviewed them and reported back to TWBC on 9th June 2016:

- . **Bullet point 22** – ".....On this basis, there is not a shortfall of allocated and deliverable land in Royal Tunbridge Wells and Southborough and the rural fringe. It follows I do not accept a need to allocate any land currently in the Green Belt."
- . **Bullet point 24** – "It follows that I agree the approach the SALP has taken to the Metropolitan Green Belt and I have not recommended that any land currently within the Green Belt should be allocated."
- . **Bullet point 79** – "The SALP has a number of deficiencies in relation to soundness, and, or legal compliance for the reasons set out above which means that I recommend non-adoption of it as submitted, These deficiencies have been explored in the main issues set out above."

A very different picture emerged at the Regulation 18 Consultation, perpetuated now in the PSLP, when the majority of the Metropolitan Green Belt in the "rural fringe" was put forward as Strategic Sites for Tudeley Village and East Capel/Paddock Wood. Additionally, comments expressed by the Inspector regarding drainage and flooding concerns at Bullet points 43, 60, 65 and 67.

As a result, the PSLP is therefore unsustainable and not sound.

Policy STR/SS1 - Strategy for Paddock Wood and East Capel

The format of the online submission tool means that one has to make two submissions, one for each of the Strategic Sites one objects to. The crossover between the two Strategic Sites, and the impacts on the community, are very similar. Therefore, there will be repetition between the two submissions.

I apologise to the Inspector for this duplication, and he/she having to read the same thing twice, but this is the nature of the beast that technology has created for this process, rather than the fault of any responders.

Policy STR/SS3 - Strategy for Tudeley Village

The format of the online submission tool means that one has to make two submissions, one for each of the Strategic Sites one objects to. The crossover between the two Strategic Sites, and the impacts on the community, are very similar. Therefore, there will be repetition between the two submissions.

I apologise to the Inspector for this duplication, and he/she having to read the same thing twice, but this is the nature of the beast that technology has created for this process, rather than the fault of any responders.

Policy TP1 - Transport Assessments etc

The Policy TP1 as written is good words and gestures. However, there are a number of issues with this, particularly in relation to the two Strategic Sites at Tudeley Village and East Capel. These include:

- . Little, or no evidence of KCC's involvement/agreement/approval of the Transport Assessments. For the two Strategic Sites the transport infrastructure issues are so large that KCC's views can not be left to a later stage in the process.
- . Independent Consultants (motion.co.uk) have been employed by Save Capel, and Friends of Tudeley (FoT) have employed another consultant (connect.co.uk) to review the Transport Assessments in the PSLP. Both consultancies are very experienced in this situation and both agree that:
 - . The modal shift within the plan is unachievable and therefore the traffic projections are very optimistic on the low side of the spectrum.
 - . The proposed mitigations are unrealistic in terms of physical and fiscal restrictions.
 - . The proposed Five Oak Green bypass, no discussions have been held with either of the two landowners about this proposal; both are adamant that they will not sell willingly.
 - . The impact of "closing" Hartlake Road, except to buses, has been totally underestimated.
 - . Linked to the point above, there appears to be little, or no, consultation with either TMBC or MBC about their own development plans on the border with TWBC, therefore, the projections are an "internal to TWBC" assessment rather than a more holistic approach involving their neighbouring Borough Councils.

As a result, the PSLP is therefore unsustainable and not sound and questions must be asked about the Duty to Co-operate with TMBC and MBC on the Transportation and Traffic Issues.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Quite frankly, the PSLP process needs to be suspended and TWBC need to start again from scratch. They should focus on:

- . Realistic assessment of housing needs rather than government-imposed targets and then with a 1,000-home buffer!

- . Spreading the Place Shaping across the Borough rather the present over-reliance on delivering the undeliverable of the two Strategic Sites at Tudeley and East Capel/Paddock Wood, on TMBC's doorstep.
- . A proper assessment of Infrastructure requirements, especially for transport, to reflect the needs of a revised Plan.
- . Much better liaison with neighbouring Councils, particularly TMBC and MBC, and the infrastructure requirements and impacts of their own Plans.

The current PSLP has been a rushed, botched and biased attempt, with 50% of the Borough's housing needs being forced onto 2% of the population who are represented by just 1 Councillor out of a total of 48.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_156

Comment

Consultee	Strategic Planning ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) (Strategic Planning - [REDACTED])
Comment ID	PSLP_2193
Response Date	04/06/21 16:56
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Kent County Council-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP_2164), Section 2 (PSLP_2168), Section 3 (PSLP_2169), Policies STR1 (PSLP_2170), STR2 (PSLP_2171), STR4 (PSLP_2172), STR5 (PSLP_2174), STR7 (PSLP_2175), STR8 (PSLP_2176), Section 5 (PSLP_2177), Section 5: Royal Tunbridge Wells (PSLP_2178), Policies AL/RTW1 (PSLP_2180), AL/RTW5 (PSLP_2181), AL/RTW7 (PSLP_2183), AL/RTW14 (PSLP_2184), AL/RTW17 (PSLP_2185), AL/RTW21 (PSLP_2187), STR/SO1 (PSLP_2188), AL/SO1 (PSLP_2190), Strategic Sites (PSLP_2192), STR/SS1 (PSLP_2193), STR/SS2 (PSLP_2195), STR/SS3 (PSLP_2196), STR/PW1 (PSLP_2199), AL/PW1 (PSLP_2200), STR/CA1 (PSLP_2201), AL/CRS1 (PSLP_2202), AL/CRS2 (PSLP_2203), AL/CRS3 (PSLP_2204), AL/CRS4 (PSLP_2205), AL/CRS6 (PSLP_2206), AL/CRS7 (PSLP_2207), STR/HA1 (PSLP_2208), PSTR/BE1 (PSLP_2209), PSTR/BI 1 (PSLP_2210), PSTR/BM1 (PSLP_2211), PSTR/FR1 (PSLP_2212), PSTR/GO1 (PSLP_2213), PSTR/HO1 (PSLP_2214), AL/HO1 (PSLP_2215), PSTR/LA1 (PSLP_2216), AL/LA1 (PSLP_2217), PSTR/PE1 (PSLP_2218), AL/PE4 (PSLP_2219), PSTR/RU1 (PSLP_2220), PSTR/SA1 (PSLP_2221), AL/SA1 (PSLP_2222), PSTR/SP1 (PSLP_2223), EN1 (PSLP_2224), EN3 (PSLP_2225), EN4 (PSLP_2226), EN5 (PSLP_2227), EN8 (PSLP_2228), EN9 (PSLP_2229), EN10 (PSLP_2230), EN12 (PSLP_2231), EN13 (PSLP_2232), EN14 (PSLP_2233), EN18 (PSLP_2234), EN19 (PSLP_2235), EN20 (PSLP_2236), EN25 (PSLP_2237), EN26 (PSLP_2238), H1 (PSLP_2239), H3 (PSLP_2240), H7 (PSLP_2241), ED1 (PSLP_2242), ED2 (PSLP_2243), ED3 (PSLP_2244), ED4 (PSLP_2245), ED5 (PSLP_2246), ED6 (PSLP_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP_2248), Policies TP1 (PSLP_2249), TP2 (PSLP_2250), TP3 (PSLP_2251), TP4 (PSLP_2252), TP5 (PSLP_2253), TP6 (PSLP_2254), OSSR1 (PSLP_2255), Appendix 4 (PSLP_2256) and Evidence Base (whole Plan) (PSLP_2257)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Education

The education provision outlined in the Local Plan incorporates the additional education provision required within the proposed allocations. It is important to note that the 2FE Primary School within the Mascalls Court Farm site that already has planning permission, is required in part to also support the total growth within this policy.

Provision and Delivery of County Council Community Services and Facilities

The County Council recommends that the provision of extra or specialist care goes beyond consideration of older people but also supports those with learning and physical disabilities and other vulnerable groups. KCC would welcome continued engagement with the Borough Council in ensuring that the necessary homes to support a sustainable community are delivered.

Sustainable Urban Drainage Systems

The County Council supports the requirement for a Drainage Strategy to be produced for development coming forward within the Paddock Wood and Capel area, which if based upon the assessment undertaken within the Strategic Flood Risk Assessment (SFRA), will ensure the management of surface water and flood risk within the locality.

KCC recommends that the policy promotes the integration of drainage measures within open space to provide for multi-functional benefits.

KCC also recommends that design codes or supplementary planning documents are developed for this strategic allocation to promote quality sustainable drainage design, which should include consideration of water quantity, quality, amenity and biodiversity. There must also be consideration of on-plot controls such as green roofs, rain gardens and swales. Any design code should also ensure that any existing watercourses are retained to the degree possible and have sufficient margins to enable maintenance.

Public Rights of Way

The PRow network should be specifically mentioned within this policy. The existing network of Footpaths, Bridleway and Restricted Byway in the area provides an opportunity for Active Travel connectivity across the Borough.

Question 6

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The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Question 7

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_64

Comment

Agent	Mr Nick Brandreth [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Lambert & Foster LLP
Address	House of Portmeirion Commercial Road TONBRIDGE TN12 6DS
Consultee	[REDACTED]
Company / Organisation	Keylands
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Keylands [REDACTED]
Comment ID	PSLP_1109
Response Date	02/06/21 12:49
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	<u>PSLP_1109_Lambert and Foster for Keylands_SI_Representation_Redacted</u>
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Keylands
Question 2	
Agent's Name and Organisation (if applicable)	Lambert & Foster LLP
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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LOCAL PLAN CONSULTATION

KEYLANDS SALEFIELD, LUCKS LANE, PADDOCK WOOD (SITE NO 340)

With regard to the Consultation to the Tunbridge Wells Borough Pre-Submission Local Plan, we submit a response related to employment land in the north-east parcel of the proposed Paddock Wood Draft Masterplan. We refer specifically to Site PW1_5 identified on Map 28 related to Policy STR/SS1 identified on Map 27 (Masterplan areas) and Map 28 which refers to the Keylands Salefield.

This policy relates to employment uses involving two adjacent sites within separate ownership. We seek to confirm that for both sites there are a range of positive enquiries for development. This range of enquiries extends from established businesses within the town, particularly several of the more aged properties to the north side of the railway station relocating to a more appropriate purpose built facility. In addition, we have received enquiries from food outlets, supermarkets, building materials depots, agricultural and builders' plant machinery outlets and a developer specialising in small business units to be sold for freehold owner occupation. At this stage, particularly with the Keylands Salefield, it has been decided to await the outcome of the Local Plan Consultation. This note is to confirm there is positive interest and it is for us to progress with addressing the technical solutions required to deliver the site upon clarification that the Local Plan is progressing through its various stages to adoption.

With regard to the overarching policies set out within this Local Plan Consultation, we would also draw your attention to three other linked policies. We fully support the proposals set out in Policy EDN9 with regard to Biodiversity Net Gain. There is scope within these sites to accommodate the requirements of this policy without venturing into third party land. We further support Policy ED1 identifying the key employment areas. However we would ask for appropriate flexibility to be considered within Policy ED2 which relates to the retention of existing employment areas, particularly within Paddock Wood. To the north of the railway station, there is aged commercial property which would benefit from an appropriate flexibility within the strategy for Paddock Wood including land at East Capel to allow appropriate viable redevelopment which in itself can facilitate relocation potentially within the identified key employment areas for new facilities to take the businesses forward for the future.

This note is to confirm a positive as to the potential for these draft allocations which we look forward to the Local Authority supporting through the remainder of the Local Plan process through to adoption.

[TWBC: for representation, please see supporting documents]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here. PSLP 1109 Lambert and Foster for Keylands SI Representation Redacted

Comment

Consultee	Gwendoline Lamb [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Gwendoline Lamb [REDACTED]
Comment ID	PSLP_295
Response Date	21/05/21 09:52
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Letter
Version	0.2
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mrs Gwendoline Lamb
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

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I am a resident of Five Oak Green where I have lived since 1986. It is a lovely friendly village where people watch out for one another.

Wheat I have seen of the building going on in and around Paddock Wood is absolutely horrific particularly as it is on green belt land and areas that are liable to flooding.

If the proposed building in Capel goes ahead there will be no villages just a massive town extending from Tonbridge to the far reaches of Paddock Wood.

Where will all the new doctors surgeries be built and how do you intend to employ more GPs when it is difficult to recruit any now. Obviously, another hospital will need to be built as the one in Tun Wells/Pembury would not be able to cope with thousands more patients and where would they all park.

Are the rail companies going to put on many trains for commuters travelling to London and elsewhere. This is just the start of the infrastructure that will need to be put in place.

My house was flooded at the start of 2020 with a foot of water indoors. Work is still ongoing due to the damage done.

If this application should go through and it would increase the risk of flooding.

Who had the bright idea of putting such a massive building site on a flood plain.

I hope and pray this application will not be passed and spoil so many peoples lives.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_120

Comment

Consultee	Mr and Mrs Leach [REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr and Mrs Leach [REDACTED]
Comment ID	PSLP_1907
Response Date	03/06/21 23:06
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1894,1900,1906
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mr and Mrs Leach
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR 1, STR 9, STR/SS 1 and STR/SS 3 – see Comment Numbers PSLP_1894, PSLP_1900, PSLP_1906 and PSLP_1907]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Re: Pre-Submission Local Plan (Regulation 19 Consultation) – Comments

Further to our comments on the Draft Local Plan, during the previous Consultation (Regulation 18). We again write to you, to raise our concerns about the proposed garden settlements and to object to various policies, as we do not believe that our original concerns, and those raised by others, have been adequately addressed in the Pre-Submission Plan.

We wish to take this opportunity to reiterate and elaborate on some of our key concerns, as outlined in our previous letter (dated 25th October 2019). In an effort to be concise, we will not repeat all particulars and so the reader is referred to this letter for context and completeness. For ease of reference, we have enclosed a copy of our original letter (in Appendix A).

Following the publication of Pre-Submission version of the Local Plan, we also now wish to raise other concerns, such as the legal compliance in-terms of the Duty to Co-operate and consistency with national policies.

Our comments on the Pre-Submission Local Plan, related to several policies, are outlined under the headings stated below. We are specifically concerned about the deficiencies in the proposed strategic infrastructure and the questionable need to release Green Belt land.

4. Policy STR /SS 1 – The Strategy for Paddock Wood, including land at east Capel

Object as we have concerns over the **soundness** (i.e. the justification, not positively prepared and inconsistency with national policy) of this Policy.

Our concerns and comments, are outlined as follows:

4.1 We have similar concerns to those we have raised about the Tudeley Strategic site (Policy SS /SS 3), as noted above in Section 3. This includes the following:

- The highway impact, as the frequency of services at Tonbridge station makes this the more likely destination for future commuters, residing at this site, based on the less frequent trains that serve Paddock Wood station (see Section 1).
- In-addition, to the 2,800 units proposed at Tudeley, a further 4,000 units are proposed at this site. Having over-half of TWBC's allocation within two nearby peripheral sites is likely to result in the super-saturation of the local housing market, with largely unaffordable new builds. This risks the allocation and infrastructure delivery, with likely low build-out rates, as discussed above (3.4-3.5).
- This part of East Capel site is on a natural flood plain. In view of the alternative sites, which are not at risk of flooding, then this Strategic site would likely fail the sequential test. As such, this is not sound, i.e. inconsistent with national policy.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Comment

Agent	Mr Colin Smith [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Colin Smith Planning Ltd
Address	[REDACTED] Redhill [REDACTED]
Consultee	Leander Homes [REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Leander Homes [REDACTED]
Comment ID	PSLP_424
Response Date	26/05/21 10:34
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Leander Homes
Question 2	
Agent's Name and Organisation (if applicable)	Colin Smith Planning
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4

Do you consider that the Local Plan:

Is legally compliant Yes

Is sound No

Complies with the Duty to Cooperate Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Draft policy STR/SS 1 is the policy that sets out the draft allocation of the land at Paddock Wood, including at east Capel. In summary the policy seeks to provide between 3,490 and 3,590 houses, together with three neighbourhood centres with commercial floorspace, schools, sports and leisure facilities, gypsy/traveller pitches and employment uses.

The policy also seeks to secure the phased delivery of highway and transport infrastructure, including on and off-line improvements to the A228 around Colts Hill and the provision of a new highway which bypasses Five Oak Green.

Positively prepared The main issue with this draft policy is that it will involve a significant incursion into the Green Belt. There will be a significant environmental impact as a result of the development of land currently outside of the settlement boundary and within the Green Belt which amounts to 418 ha. The land is identified in paragraph 5.159 as being around 0.7 miles from the High Weald AONB, and that the impact of development on the setting of the High Weald AONB, and on views from vantage points within the AONB, will be major factors in delivering development in this location. The AONB designation is the highest level of protection and equivalent to National Park designation in policy terms. The impact on views from the AONB is likely to be significant and adverse. Paragraph 5.161 identifies that development on the western side of Paddock Wood will need to minimise perceived coalescence between settlements. Use of the strong tree belts and concentration of denser development to the east will be an important design principle. In fact, if the development is carried out, and the settlement extended, the coalescence would not be "perceived" but actual. Regardless of the inclusion of tree belts and low-density development, the settlement would encroach into the Green Belt and reach towards Five Oak Green and the potential development of the proposed allocated site at Tudeley village. The present openness and freedom from development that exists between the western edge

of Paddock Wood and the eastern edge of Tonbridge would be lost and the Green Belt developed over.

This does not constitute positive planning in that the environmental objective of the sustainability requirements set out on paragraph 8 of the NPPF will not be met, and the purposes of including the land within the Green Belt will be compromised.

Justified The policy is directly linked to the overall strategy set out in policy STR 1, which is not considered to be justified, as other representations set out. It is not considered to be an appropriate strategy to release such large areas of Green Belt land, and also to not provide development opportunities on the edge of existing settlements which would help to support and enhance the existing services and facilities locally. The release of smaller areas of Green Belt land would result in less of a compromise of the Green Belt, particularly in area BA4 of the Green Belt Study.

Part 10 of the draft policy sets out that for development on land to the west, edged in blue on Map 27, compensatory improvements to the Green Belt should be provided. It is not clear what the compensatory improvements might be. However, the purposes of the Green Belt are, in summary, to prevent inappropriate development and to maintain openness- this is the essential characteristic of Green Belts and the fundamental aim is to prevent urban sprawl (paragraph 133 of the NPPF). It is not clear how "improvements" would help to compensate for the loss of openness or prevent urban sprawl.

Part 13 of the draft policy requires 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 substantial development on the site, unless exceptional circumstances arise. It is submitted that the drainage strategy should be considered at this stage, rather than once the site is potentially allocated through the adoption of the Local Plan. If it is not possible to reconcile the flooding issues for substantial developments, then this is likely to compromise the safety of the development and other adjoining sites that would suffer a greater risk of flooding. The capacity of the foul sewage network should be established at this stage.

An alternative strategy, to identify small scale sites that extend existing settlements in order to support and enhance their growth, and which have a lower risk of flooding, or flooding issues can be mitigated would appear to be justified.

It is therefore submitted that the proposed strategy, including the development of Paddock Wood and land at east Capel is not justified on environmental grounds.

Effective Based on the submissions above, it is further submitted that the draft policy STR/SS 1 would not be effective. Alongside the need to agree and adopt masterplan and Supplementary Planning Documents, the flooding issues do not appear to be resolved at this stage. The reliance on a single allocation to provide a substantial level of housing supply could result in a serious shortfall if not delivered.

Consistent with national policy

As set out above and in other representations, the strategy involves a large scale encroachment of built form over the Green Belt and the potential for neighbouring towns (in conjunction with the Tudeley village proposal) to merge into one another. In this way there is a significant compromise of the purposes of including land within the Green Belt, and the draft policy (and the strategy overall) would not be consistent with the NPPF.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy STR/SS 1 should be removed and replaced with policies that identify alternative opportunities for development that involve modest extensions to existing settlements, releasing Green Belt land in a more managed way, and allowing the opportunity for growth to support and sustain local services and facilities (as set out in other representations).

Such an approach would result in the draft Plan being positively prepared, justified, effective and consistent with national policy.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss the above arguments and assist the Inspector in addressing the Council's strategy.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicola Leeds ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Nicola Leeds ([REDACTED])
Comment ID	PSLP_2326
Response Date	04/06/21 16:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Nicola Leeds
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 Strategy for Tudeley Village

LCWIP Local Cycling and Walking Infrastructure Plan (p48)

[TWBC: this representation was set against the whole Plan but has been duplicated by TWBC at Policies STR/SS1, STR/SS2 and STR/SS3 for ease of reference - see PSLP_1310, PSLP_2326, PSLP_2327 and PSLP_2828 respectively]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
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Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Paddock Wood for 15 years, and have seen the expansion of the town even within that time. Despite promises, the infrastructure has never been delivered to address the issues created by the increase in housing. There has been increased flooding across the town, with more frequency, with some residents suffering from foul water in their homes caused by inadequate sewage systems having to cope with yet more residents. There has been a lack of investment by TWBC in Paddock Wood, no expansion of medical services, no improvement in the shopping facilities in the town, or in the leisure centre which is now run down. In fact, the opposite has been true. TWBC has consistently approved planning for developments that detract from Paddock Wood and add more problems without delivering on any of the investment that is critical. We have been promised time and again that there would be no further development without the infrastructure in place in advance. There is little or no regard on the impact of continued overdevelopment on the very nature of Paddock Wood and surrounding villages; no consideration of the increased flood risk to existing residents from the developments already approved, let alone those in the pipe line. And absolutely no consideration of the residents.

There is also a need to reassess the total requirement for housing going forward - the Government's "levelling up agenda" shows that increased housing will be needed in the north of England rather than in the SE corner - these changes in national approach have not been followed through into the local plan. TWBC have not sufficiently considered the future housing need of the borough to ensure that the number of dwellings being planned for is correct.

As part of the previous consultation on the local plan, TWBC included as part of its justification for building in Capel and Paddock Wood that the land owner had decided to sell the land, and that dealing with one land owner rather than several would be easier. This is possibly the worst, most egregious reason for building on one location that has ever been heard.

The local plan is not positively prepared, effective nor justified for a number of critical reasons.

Firstly, on the requirement for the plan to be positively prepared and effective. TWBC have not amended their plan to account for the changed circumstances brought about by the COVID 19 pandemic. The pandemic has shown that commuting and working patterns have changed and will continue to remain different to that expected pre-COVID - the local plan has not been reviewed to ensure it is fit for purpose going forward.

The vast majority of housing has been proposed to be placed at the tip of the borough - this site is entirely unsuitable for providing housing of increased job opportunities for the rest of the borough,

which stretches far to the east and south, whilst at the same time "lumping" the housing in one small area. The realities of travel across the borough means that this housing will not be suitable for those who live and are employed in, for example Cranbrook. Therefore, despite the stated aim of the plan to provide affordable housing and employment to the residents of the borough it will do the opposite. The proposal will result in people moving to the borough from outside it, ensuring that locals are unable to take advantage of the increase in housing, and inflating prices to the point that no one who works locally will be able to live here.

Much of the infrastructure included within the local plan will not be for TWBC to provide - and the rest will be dependent on "contributions" from developers. There is a very real risk that these will never materialise.

At the recent vote by councillors on whether to move to Reg 19 consultation, several of the papers were not made available, and worse, it was clearly stated in the meeting that some councillors had not even bothered to review the papers in advance of the vote. This is a clear abdication of responsibility, and undermining of due process.

Therefore the plan is not effective.

In relation to whether the plan is justified - the response to regulation 18 consultation was woefully inadequate - despite a large number of responses expressing serious concerns with the local plan (97% opposed the plan), these were not taken into account, with TWBC ploughing on with their proposal regardless of the views of the residents who would be affected by it. This makes a mockery of the consultation process required under national law. The only changes made were to exacerbate the issue by putting more houses into the plan for Capel and Paddock Wood.

The local plan also proposes to build on land that is at risk of flooding, while taking away agricultural land and green spaces. These are all in contravention of the stated aim of the plan.

The plan itself states that green belt is to prevent urban sprawl and should be protected - yet TWBC are proposing to remove 5% of green belt land in Capel parish to build the extension to Paddock Wood, and the Tudely Village. These are entirely unjustified removals of green belt land, and would in effect create a long corridor of development between Paddock Wood and Tonbridge. Green belt is meant as a protection - it should not be removed from such protection without significantly stronger justification. There are alternative sites which would not require the use of green belt land such as Castle Hill.

Flooding is a very real issue already in Paddock Wood and Five Oak Green. Flooding incidents are increasing, with the greatest threats coming from surface water flooding. The sites at Capel and Paddock Wood proposed for development are all prone to flooding, and play a key role in ensuring that existing developments are not affected more severely. This winter, the ground was saturated for weeks in the areas the plan expects to build. In Tudely, the water runs down the road like a river, and that is without the additional building in place. The proposal would remove trees and other vegetation that use the water; they would concrete over the very land with acts as a sponge. The mitigation that is proposed is insufficient to respond to this increased, and increasing risk. Combined with the proposal to create new roads to service these new developments, the issue just gets worse and worse. This is also against national policy which states that flood plans should not be built on where alternatives exist. Alternatives exist within Tunbridge Wells borough. Where mitigation plans are put in place, they will only exacerbate the impact on communities up and down river - places which already struggle with flooding - Tonbridge, East Peckham, Yalding to name just a few.

The plan also proposes to dig up more and more countryside to build additional roads to deal with the increased traffic - on yet more green belt and countryside. This area risks being covered in concrete, with the increase in air pollution, risk of flooding, reduction in green space and biodiversity the only likely outcomes.

The proposal made under the LCWIP Local Cycling and Walking Infrastructure Plan to block access to vehicles over the railway bridge will completely cut off half of Paddock Wood from the town centre - forcing all vehicles to use the A228, or country lanes. There is no consideration to the impact of having thousands of extra cars needed to make that journey, no consideration of the real world impact on the residents of Paddock Wood. What if there is an accident on the main road that closes it? What if an ambulance or fire engine is needed? What about residents who are less mobile? This plan will have the opposite effect to that stated. This has to be one of the most poorly thought through and ludicrous ideas within the local plan. Wishing that fewer people drove cars doesn't make it so. Taking other steps

- effective enforcement of parking on Commercial Road, creating a lively retail area rather than permitting more and more flats to be built in place of retail units will be much more likely to.

This plan goes against national policy - there is no provision for addressing the biodiversity crisis, no substantive plans to mitigate against the impacts of climate change with the expected increase in flooding. There is no recognition of the importance of green space for residents of Paddock Wood. There is no substantive plan for ensuring biodiversity net gain across the plan.

The only part of this plan I can support is the provision of a swimming pool - and yet, even with all the housing planned, it's still only potential in the plan. There is no assurance that ANY of the "benefits" put forward will be realised.

Paddock Wood has already absorbed 1000+ housing units, the intention to build yet another 6000+ dwelling within the space of 5 miles is utterly without consideration of the current character of the area, or its residents. Paddock Wood will grow in area by 200%, Tudely will expand by 500%. This is completely disproportionate. Local residents are being ignored.

It is also clear from the representations from Tonbridge and Malling Borough Council (TMBC), and its many residents that the duty to cooperate has been entirely disregarded by TWBC. The impacts of the exponential growth in housing proposed under this local plan will be felt by neighbouring local authorities as the services and infrastructure required by such a significant increase in housing and population will predominantly be felt by TMBC and Maidstone BC rather than by TWBC, but will not receive any revenue from council tax etc. the increase in traffic alone will have a significant impact on the residents of TMBC, there will be an increase in the number of people expecting to attend Tonbridge schools, and use leisure facilities in Tonbridge. TWBC's intention to put the vast majority of its intended housing growth right on the border with 2 other local authorities shows a blatant disregard for the knock on impact on those boroughs.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

TWBC need to LISTEN to its residents and neighbouring local authorities. There needs to be a fundamental reassessment of where additional housing is needed in the borough and not take the easy approach of putting the vast majority of housing into one small area of the borough which won't support other residents and unfairly results in 15 years of disruption for a small proportion of the borough's residents. This will help address the effectiveness of the plan.

Alternative sites need to be considered - and some have already been offered up by developers. There has been inadequate consideration of brownfield and alternative sites, with simple dismissal of such ideas in response to proposals offered under previous consultations. These sites should be where they are not on flood plains, not on good agricultural land that will be lost forever, and not where the impacts of the developments will be felt almost entirely by a small proportion of residents and by those residents of neighbouring local authorities who will not benefit from any additional funding.

In addition, options 7 and 8 as set out in the Sustainability Appraisal should be further considered to more fairly distribute housing need across the borough.

Should development continue in Paddock Wood and Tudely Village, it must be a requirement that the additional services and infrastructure the plan suggests "may" follow need to be in place first. There

needs to be a complete rethink of the LCWIP Local Cycling and Walking Infrastructure Plan so that the road bridge in Paddock Wood is not closed.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

the assessment of impact on the sustainability objectives in table 15 of the SA are not accurate - the benefits are overplayed - they would not be felt across the borough, the developments will not provide social mobility and inclusion as suggested, and the negative impacts on air, biodiversity, climate change, health, noise, travel and water are all under recognised.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Dr & Mrs David & Jane Lloyd [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dr & Mrs David & Jane Lloyd [REDACTED]
Comment ID	PSLP_927
Response Date	01/06/21 15:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	David & Jane Lloyd
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR/SS1 and STR/SS3 – see Comment Numbers PSLP_927 and PSLP_934]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

.	It is not effective
.	It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I find that this pre-submission local plan is not legally compliant because it has not been fully consultative and democratic. TMBC have set out how they have followed the mechanics for consultation with provision for informing the public and answering questions, however, in the midst of a pandemic with enforced social distancing, when gatherings and face-to-face meetings are not allowed by law, there is no possibility of a normal community meeting.

These proposals for the extensive new development in Tudeley and Capel make huge and sweeping changes to the lives of the rural community and beyond, and should be fully exposed and debated, not passed after two months, when individuals are forcibly isolated and cannot meet as a community.

Inevitably, the lack of normal debate discriminates unfairly against those who do not have access to a computer and the internet. Neither does the pervasive news and events surrounding the pandemic allow the mental space to give TWBC planning issues a reasonable airing. People facing life-and-death worries about their elderly relatives, their own jobs, mental health and getting their family vaccinated, can find it impossible to focus and engage with responding to TWBC proposals, which on paper will seem very remote from their everyday lives, or very daunting. Being advertised in a circular, or exhibited in a Town Hall is not the same as public engagement through meetings; other measures are second-best and inadequate. Hence running this Regulation 19 consultation at this time is unfair and undemocratic.

One cannot escape the fact that language of the Local Plan increases obfuscation. It is not designed to aid transparency and help the public understand the Plan; I offer the example below:

"Within the context of a long-term vision and related objectives, it [the plan] comprises overarching strategic policies, including a new development strategy, supported by both place-specific local strategies and site allocations, and generic policies on a range of topics." (From front page of pre-Submission Local Plan website)

TWBC does not demonstrate commitment to listen to the public's views even when they speak clearly.. In the huge response to the Regulation 18 consultation, (800 or so respondents), approximately one third of these objected to the CA1 Policy to create a 'Tudeley Garden Village' development. However, when the revised 'pre-submission local plan' finally emerged in March 2021, these objections had not been taken on board and nothing had changed; alternatives were not considered.

The public's hostility to their Council's plans was demonstrated in this year's May local elections, when the Conservatives lost seats and so lost their overall control of Tunbridge Wells Borough Council. I urge the Planning Inspector to take this opportunity to recognise the public's reasonable and legitimate objections to these proposals, building over Green Belt farmland.

The Plan may not be consistent with National Policy in the post-Covid era (see Robert Jenrick, 16 December 2020)

We understand that the Government has modified its policy on national targets set for housing. The Secretary of State, Robert Jenrick, has clarified that the numbers are not set in stone, but should be applied using local understanding. This seems to recognise that in the south-east, many areas are already highly developed, and the Green belt is limited and valuable, and in these situations the use of brown-field sites and in urban centres is preferable. TWBC has failed to take this advice on board, and is set on meeting full housing targets, in a blunt and cack-handed way, even when their proposed housing numbers may not be required, and are at an environmental price that is too high.

This Local Plan is unsound because it is not justified

This Plan is unsound because it cuts across Green Belt policy for no good reason. The siting of the new development is not based on sound planning – it seems opportunistic, based on one landowner who is willing to sell.

a) To build this development, the Plan envisages de-designation of 407 hectares of green belt countryside on the High Weald across Tudeley and Capel, used for arable farming. The outstanding features of the area are described in the Local Plan in 5.262

The southern part of the parish is located within the High Weald AONB. There are significant areas of ancient woodland, areas of archaeological potential, historic parks and gardens (Somerhill School and the Postern), a Scheduled Monument (Castle Hill Iron Age Hill Fort), and ecological/wildlife designations (Tudeley Woods, Somerhill Park, parts of East Tonbridge Copses and Dykes and River Medway) across the parish.

The reasons are not justifiable for de-designation of the Green Belt in this spectacular area adjoining Tonbridge. There exist no 'exceptional circumstances' that justify this. It will create one urban sprawl, by enlarging villages between Paddock Wood and South Tonbridge (Tudeley, Capel, Five Oak Green) over a period of time, (see figures in the Plan) effectively creating one long suburb between Tonbridge and Paddock Wood. This is totally against the principle on which the Green Belt was founded: to maintain boundaries between town and countryside – and thus give town-dwellers ready access to the countryside.

b) It is not justified because there are better alternatives closer to existing development. Alternative sites been proposed, (such as land near the A21 corridor, or at Castle Hill), but do not seem to have been seriously investigated by TWBC. By adopting a more distributed approach to development, by building smaller developments across the whole Borough, there would be less dislocation of existing communities. Services could be more easily provided and new housing developments more easily absorbed.

c) TWBC have not justified their approach by seeking the co-operation of TMBC, (the adjoining authority), or by adequately considering the impact on Tonbridge. TWBC has put 'Tudeley Garden Village' at a comfortable distance from Tunbridge Wells, at the far end of its own territory and it has not thought through the real world implications of the scheme, of the disruption to existing commuter and traffic flows, and the services that would be required by a new population of this size.

The site it has chosen is geographically anomalous, because it is only 2 miles distant from Tonbridge and 6 miles distant from Tunbridge Wells. The existing village of Tudeley has its closest links to Tonbridge (pre-1972, it was part of Tonbridge Borough Council). This proposed new development has huge implications for Tonbridge which have not been adequately considered. The greatly increased traffic flows into Tonbridge resulting from 4000 new houses will have a huge impact on Tonbridge, and big implications for Kent County Council highways provision (but would scarcely affect Tunbridge Wells).

d) This approach by TWBC to fulfil its housing target seems unsound and unbalanced. Now national policy seems to recognise that in the south-east, many areas are already highly developed; that the Green belt is limited and valuable, and in these situations the use of brown-field sites and in urban centres is preferable. (Jenrick, 16 Dec 2020) TWBC has adopted a blunt and simplistic approach in its interpretation of national policy, by calculating the maximum number of houses it should build over the stated period, and have made a decision to build the majority in one place, to create 'Tudeley Garden Village' or 'New Town'.

e) Taking into account the points above, I think this Green Belt site has not been chosen for sound planning reasons, but rather, for opportunistic reasons. The site offers TWBC a straightforward negotiation with a single landowner, the owner of the Hadlow Estate. Because it is a greenfield site it will be attractive to developers, and present few problem for builders, and substantial profits. Unfortunately, it takes little account of the impact on lives of residents in this part of Kent – not just in these villages directly affected, but also in adjoining villages along the access roads - and in Tonbridge, where I live. These impacts have not been included in the costings.

The Local Plan, with specific reference to 'Tudeley Garden Village' is unsound and not effective - because the finer detail has not been adequately evaluated. Costs should be included of mitigating adverse effects (flooding, air pollution, loss of habitat and bio-diversity) and supplying new infrastructure. Much of the loss is irreplaceable: for example, the heritage value of views over Kent countryside and oast houses from All Saints Church and churchyard, Tudeley (with its Chagall stained glass, drawing visitors from over the world.) There is the amenity value of the network of woodland and footpaths, that has proved so essential to personal well-being during the Covid crisis, and the dark skies, lost to fluorescent street lighting and traffic signals.

The costs of creating a New Town (next to Tonbridge) have been glossed over and not factored in: provision of infrastructure and public services; the costs of flood protection, utilities, water and sewerage and improving roads and parking, and schools, leisure and health facilities. A sizeable portion of these indirect costs will fall on Tonbridge as it is the nearest major town offering a range of services and a station to London. TMBC will not automatically receive any council tax from the new residents to offset these costs.

Train services in Tonbridge and associated parking are already at capacity. Details need to be supplied from the Railway Authority as to how these rail needs will be met, and also from Kent County Council, regarding upgrading the road network. More traffic will generate higher air pollution, that also has a health cost. Tunbridge Wells already is the borough with the 8th worst level of air pollution in Kent, which is poor for a mostly rural area. (NB. It seems a forlorn hope that Tudeley will have a new rail station, with only a 7 minute journey time now between Tonbridge station and Paddock Wood.)

As an example of a unfactored impact on Tonbridge, we can use our own road, Goldsmid Road, which will be a main carrier of additional traffic from Tudeley to the town centre and Tonbridge station. It already has commuter traffic and school traffic at peak times contributing to congestion and air pollution in the road - and there are 4 schools within half a mile with many pedestrians. Parking either side of the road makes for bad visibility; in addition, a narrow one-way tunnel at the bottom adds to the congestion, as do large vehicles, such as school buses and 'bin lorries'. This situation will be made much worse by additional traffic from 'Tudeley Garden Village' but this has not been taken into account.

TWBC give no evidence of carrying out the 'Duty to Co-operate'

In this proposal to build a 'New Town' of 4000 or more houses, it would be expected that TWBC, would prepare the ground by consulting and co-operating with the neighbouring Borough Council, Tonbridge and Malling who are closest to the new development and will bear the impact (see discussion of this above). To my knowledge, no overtures of co-operation have taken place. The same 'duty to co-operate' should be applied to co-operating with Network Rail and the train operators, as here, there will be a major impact; also more co-operation is needed with Kent County Council, regarding the road network, where guarantees are needed that the necessary infrastructure will be put in place. No details on this are given in the Local Plan.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 Any decision on STR 1 and STR 3 (Tudeley and Capel) in this Local Plan should be postponed until further evaluation of requirements and impact costings has taken place and until further data is available. The response of TMBC is essential and should be a central part of the process. Also further details need to be made available from KCC on provision of a road network; also a response from the Rail authority is needed on what rail provision will be made.
- 2 Numbers of dwellings required should be re-evaluated in the light of latest Government policy and revised down if possible, recognising this area is already highly developed.
- 3 More alternative housing options should be explored to meet housing needs. These should include more distributed development and brownfield sites, and development of existing urban centres, such as Paddock Wood. The enlargement of Tudeley and Capel should be abandoned.
- 4 We have argued above that the consultation process during the pandemic has been essentially undemocratic. When further information is available, and society returns to its normal arrangements, the consultation should be set up to run again, on the basis of a revised Plan.
- 5 TWBC should publicly accept the intrinsic importance of Green Belt land adjoining Tonbridge and recognise its value in the post-Covid era for the contribution it makes to bio-diversity and people's mental health.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_111

Comment

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Event Name	Pre-Submission Local Plan
Comment by	Logistics UK [REDACTED]
Comment ID	PSLP_1864
Response Date	04/06/21 12:48
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1855, 1864-1867 Barton Willmore for Logistics UK SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Logistics UK
Question 2	
Agent's Name and Organisation (if applicable)	Barton Willmore LLP
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Section 5 - Royal Tunbridge Wells, Policies ED 2, STR/SS 1, STR/SS 3 and STR/RTW 1– see Comment Numbers PSLP_1855, PSLP_1864, PSLP_1865, PSLP_1866 and PSLP_1867. The full representation has been attached as Supporting Information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TWBC LOCAL PLAN REG. 19 REPRESENTATIONS

HERMES HOUSE, ST JOHN'S ROAD, ROYAL TUNBRIDGE WELLS

1.0 INTRODUCTION & OVERVIEW

1.1 These representations are made on behalf of Logistics UK in respect of their headquarters at Hermes House, St John's Road, Royal Tunbridge Wells TN4 9UZ and the land to the rear ('the Site': see Site Location Plan (drawing reference 2104/FS/001) enclosed at Appendix 1) and are submitted to the Regulation 19 consultation on the emerging Tunbridge Wells Borough Council ('TWBC') Local Plan (Pre -Submission Local Plan, undated).

1.2 The Site currently comprises offices in employment use (albeit currently only sparsely / rarely occupied) with associated car parking, accessed from St John's Road, and an area of grassland to the rear. The Site is not located within a conservation area and there are no known designated or

non-designated heritage assets on or in proximity. The Site falls within Flood Zone 1 and is not known to be subject to any ecological designations.

1.3 Logistics UK have occupied Hermes House since 1975. The older building on site is understood to have originally been constructed as church and used for religious purposes before being converted to offices. It has an unusual circular plan form that does not lend itself to modern office use and results in inefficient use of the space, both in terms of the area of unused space and the ability to lay out the useable space in a manner conducive to modern working practises. Moreover, Logistics UK run training and conferencing events from Hermes House which again does not lend itself to this purpose owing to the number of structural supports/ columns.

1.4 An extension was constructed in the late 1980s to provide two floors of office accommodation on a more regular plan form. Whilst at the time the extension functioned well it is now dated and requires significant upgrade works including replacement of all windows, a new heating system and air conditioning. There are also difficulties providing heating and cooling across the two elements of Hermes House as both differ significantly in their construction and design. This creates further inefficiencies.

1.5 A number of Logistics UK's staff travel to work by train. Hermes House is accessible by car but is some 1.8 km from the nearest train station (Tunbridge Wells) and is located outside of designated town centre/ employment areas. The Site is not in a sustainable employment location. Moreover, it is located in a predominantly residential area where adopted and emerging policy would resist new employment uses owing to the impact on residential amenity, issues of neighbourliness and incompatibility of land use.

1.6 As a result of the poor quality of the existing employment accommodation and its poor public transport accessibility and location within a residential area, Logistics UK has been planning to vacate Hermes House and relocate to a more appropriate premises and location within Tunbridge Wells. This process has been expedited owing to the pandemic and shift to a greater proportion of staff working from home thus requiring a smaller area of employment floorspace in any event.

1.7 Given the location of Hermes House in a residential area, residential has been identified as the most appropriate and compatible use moving forward. Moreover, TWBC has been unable to demonstrate a five-year supply of housing land for the most recent monitoring years and has a worsening Housing Delivery Test score despite having an Action Plan in place. The emerging Local Plan provides the opportunity to address the current and historically poor housing delivery in the Borough. However, the heavy reliance of the emerging Local Plan on two large strategic sites to meet almost 75% of its housing need over the Plan period is a high-risk strategy. Moreover, delivery of new homes on these strategic sites is not anticipated for four years (in our view at the earliest). The Council should, therefore, seek to allocate additional small/ medium scale sites for residential development to address historically unmet need, provide fluidity in five -year housing land supply and ensure short -term delivery of homes to mitigate the risk of delays from the strategic sites.

1.8 There are Borough-wide benefits of including additional site allocations that are deliverable in the first five years of the Plan. There are also local benefits to Royal Tunbridge Wells which has relatively few proposed site allocations that are expected to yield new homes in the initial five year period. A steady supply of new homes is required in key settlements to provide choice and variety in the market and to mitigate against increasing issues of affordability. The Council should consider additional residential allocations in Royal Tunbridge Wells that are deliverable in the short-term to maintain a steady supply of new homes in this principal settlement.

1.9 In addition to the above, allocation of a previously developed site in an established urban area such as Hermes House reduces the pressure on greenfield development and reduces the need for Green Belt release. NPPF paragraph 137(a) requires LPAs 'to make as much use as possible of brownfield and underutilised land' before concluding that exceptional circumstances exist to justify release of land from the Green Belt for development. Hermes House is a brownfield, underutilised site and whilst this Site alone would not remove the need for some Green Belt release to meet TWBC's housing needs, it ought to be considered as an option for allocation before Green Belt sites in the sequential approach to identifying land to meet residential development needs through the emerging Local Plan.

1.10 Redevelopment of Hermes House alone would yield relatively few dwellings. As such Logistics UK has also reviewed the potential of the land immediately to the rear. The land to the rear is currently in educational use but does not serve a specific educational or recreational function, nor has it been

identified as a suitable location for future educational development being distant from the main school campus. In short, this area of land forms part of the school grounds but is incidental to the educational/ recreational function of the school.

1.11 The Site has an area of approximately 0.65 hectares. A capacity study (enclosed at Appendix 2: drawings reference 2104/FS/010) indicates that circa 48 homes could be accommodated at a density of 74 dwellings per hectare. Combining Hermes House with the land to the rear allows the number of new homes to be optimised and also for a more varied mix of homes of different sizes suitable for a range of households (including apartments and houses) in addition to a greater number of affordable homes.

1.12 The Hermes House part of the Site currently falls within the Limits of Built Development as per the Policies Map (2016). The Council has imposed Article 4 Directions on a number of existing employment buildings to prevent them from changing from office to residential under current Permitted Development regulations. These 'protected' employment buildings are largely those falling within accessible town centre and/ or established/ designated employment locations. Hermes House falls within a solely residential area and has not been 'protected' through an Article 4 Direction. Subject to meeting the requisite criteria, Hermes House could therefore be converted to residential. However, as set out above, the, inter alia, awkward plan form, inherent issues with heating and cooling and poor standard of the building would make for poor/ substandard homes which prevents this from being an option.

1.13 The southern part of the land to the rear also falls within the Limits of Built Development with approximately 0.15 hectares falling outside and within the area currently designated as Rural Fringe.

1.14 Logistics UK consider the Site to be ideally placed to deliver a range of high -quality new homes in an established residential area, with only a minor adjustment to the existing boundary of the Limits of Built Development required to facilitate this. It is Logistics UK's position that the Site should be included within the emerging Local Plan as a residential site allocation to deliver circa 50 new homes. The Site is deliverable in the short -term and will assist in diversifying the type and scale of site allocations thus reducing reliance on large -scale strategic allocations that require significant new infrastructure and risk delay, with the consequential impact on housing land supply and delivery.

1.15 The Site is deliverable in the short -term as per the NPPF definition (Annex 2):

'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years'

1.16 The Site comprises previously developed land (Hermes House) with very little landscaping and mown/ managed grass on the land to the rear. There is very limited ecological potential with no trees/ hedges that would pose a constraint to development as proposed. There are also no national designations that would impede the development such as Green Belt, flood risk or heritage. Access is established from St John's Road.

2.0 CURRENT USE

Employment

2.1 Hermes House was converted from its previous religious use to offices prior to Logistics UK's occupation. The older building has an unusual circular plan form and includes an amphitheatre - style space. This space has historically served a function for seminars/ conferences but the structural supports/ columns are not ideal for this purpose and the resulting office floorspace is awkward and inefficient and cannot be considered to provide modern, functional or flexible office accommodation.

2.2 In an attempt to improve the quality of the employment accommodation on site Logistics UK constructed an extension in the late 1980s (LPA reference 84/01473/FUL) facilitated by the demolition of a residential property. Whilst providing a more regular plan form, this extension is now over 25 years old and requires significant upgrade works to allow it to continue to function as office floorspace. For example, the large areas of glazing make the space too hot in summer but too cold in winter. The extension does not benefit from air conditioning and the heating system is inadequate. Both are required along with new windows. However, there are inherent difficulties providing heating and cooling systems to serve the older part of the building and the extension. This further adds to the inefficiency of the current buildings.

2.3 In addition to the above, Hermes House is located in a predominantly residential area outside of a designated town centre and employment location. It is accessible by car but some 1.8km from Tunbridge Wells train station. Several members of staff travel to work at Hermes House by train, a proportion that Logistics UK consider would be higher if the offices were located in a more convenient location in proximity to the train station.

2.4 There is also the issue of compatibility of land use. Hermes House is surrounded on three sides by residential properties, being located on a residential road in a predominantly residential neighbourhood. Logistics UK runs software that requires a constant (24/7) power supply and generators. Care is taken to minimise noise from the generators but they are not ideal in a residential area. Moreover, the heating and cooling systems required to address the inherent issues with the current buildings and allow the employment use to continue will further add to the noise emitted. These issues, coupled with vehicle movements, staff outside use (including from the smoking shelter) and the types and scale of signage required, are present with the existing employment use and any likely future employment use.

2.5 It is on the basis of the above that Logistics UK consider that Hermes House should be returned to its former residential use as this would be more compatible with the established residential use and character within the area. Moreover, in line with adopted Core Strategy (2010) Core Policy 7, employment uses, particularly of the scale of Hermes House, are more appropriately sited in sustainable and accessible town centre and employment locations.

Education

2.6 Approximately 60% of the land to the rear of Hermes House is located outside of the Limits of Built Development and within the Rural Fringe, with the southern portion (circa 40%) within the Limits of Built Development. It is all within educational use forming part of the grounds of an neighbouring school.

2.7 This land has been included within the Site as it forms a logical extension to the Hermes House site and allows for an improved residential layout that facilitates the delivery of a higher number of homes that includes a greater variety of homes of different sizes (including apartments and houses) and a higher number of affordable homes.

2.8 Whilst this land is within educational use, it does not have a defined educational or recreational function. It is laid to grass and forms an incidental part of the wider school grounds. When the school has previously expanded this land has been reviewed as an option but discounted owing to its location remote from the main core of the school. It is also not easily accessible from the public highway (although it would be accessible from St John's Road through Hermes House if the sites were to be combined as proposed). In short, this land does not form a specific educational or recreational function and it is Logistics UK's position that it would be an appropriate location for small-scale residential development.

3.0 CASE FOR RESIDENTIAL

Historic Supply/ Delivery of New Homes

3.1 TWBC has a published shortfall in five-year housing land supply (Monitoring information (tunbridgewells.gov.uk) [accessed 01/06/2021]) and at 1 April 2020 could only demonstrate 4.83 years supply (see Five-Year Housing Land Supply 2019/20). This was based on a 5% buffer. However, given that TWBC's previous Five -Year Housing Land Supply 2018/19 report also identified a shortfall (4.69%: see paragraph 12), NPPF paragraph 73 would previously have indicated that a 20% buffer is appropriate. This has subsequently been superseded by the Housing Delivery Test whereby the 20% buffer is to be applied to LPAs with a Housing Delivery Test score of 85% or below.

3.2 TWBC has a published score of 86% in the Housing Delivery Test for the period 2016/17 to 2018/19 (Monitoring information (tunbridgewells.gov.uk) [accessed 01/06/2021]) (published February 2020). Whilst 1% higher than the threshold for the 20% buffer, TWBC has failed to meet or exceed its housing requirement for two of the three monitoring years that have informed the Housing Delivery Test result. The one year it did exceed it was when the housing requirement was notably lower owing to the method of calculation (pre -Standard Method). Moreover, the 2021 Housing Delivery Test results see TWBC's score reduce to 85% (Housing Delivery Test: 2020 measurement - GOV.UK (www.gov.uk) [accessed 01/06/2021]) thus housing delivery is worsening in the borough and the 20% buffer (NPPF paragraph 73) should be applied to the calculation of five-year housing land supply. This places even greater pressure on TWBC to identify additional land for residential development.

Proposed Supply of New Homes

3.3 The emerging Local Plan utilises the Standard Method figure of 678 homes per annum (Pre - Submission Local Plan paragraph 4.10) from which to establish the number of homes to plan for. The Planning Practice Guidance ('PPG') is clear that the Standard Method provides a 'minimum annual housing need figure' (PPG paragraph: 002 Reference ID: 2a -002-20190220) and a not a housing requirement figure. Whilst there is acknowledgement within the emerging Local Plan that exceptional circumstances do not exist to deviate from the Standard Method (paragraph 4.9 and 4.11) i.e. to provide for a lower number of homes, and that TWBC may need to consider taking unmet need from neighbouring authorities (see paragraph 4.13), there does not appear to have been an attempt to identify whether it would be appropriate to actively plan for a higher housing requirement.

3.4 The emerging Local Plan has been developed on the basis that site allocations to deliver some 6,900 additional homes will be required (paragraph 4.17) (albeit the Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan (February 2021) states that the Council must plan for a minimum of 7,221 homes through site allocations (paragraph 5.4). We have not interrogated the assessment that underpinned this conclusion (nor the discrepancy between the Topic Paper and Pre-Submission Local Plan). However, the emerging Local Plan is clear that this is based on the assumption that 'all previous allocations are still suitable and developable' (paragraph 4.17). In reality this may not be the case and the emerging Local Plan should actively seek to progress additional site allocations. Moreover, pursuant to the PPG, the Standard Method should be treated as a minimum figure. Thus, whilst the emerging Local Plan identifies site allocations capable of delivering between 8,076 and 8,461 homes over the Plan period (see Table 4), this may not be enough to provide for the housing required.

3.5 The historically poor housing delivery (as evidenced by the Housing Delivery Test) in the Borough and failure to maintain a five-year housing land supply should also be factors that weigh in favour of the identification of additional housing allocations to come forward in this Local Plan.

3.6 It is also noted that, whilst Royal Tunbridge Wells has 18 draft residential site allocations within the Pre-Submission Local Plan (see Section 5), the Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan (February 2021) identifies very few homes being delivered within the current five-year period (see Table 9, pages 29/30). This risks an undersupply of new homes in Royal Tunbridge Wells which will serve to drive up already high house prices. There would be merit in identifying additional site allocations, such as Hermes House, that are deliverable in the short term and can assist in providing consistent delivery of new homes in the Borough's principal settlement over the Plan period.

Strategic Allocations

3.7 The reliance of the emerging Local Plan on large-scale, strategic allocations is also of concern. Approximately 6,300 homes are identified as coming forward from two strategic allocations: approximately 3,500 homes at Paddock Wood/ East Capel (draft Policy STR/SS 1); and approximately 2,800 homes from a new settlement – Tudeley Village (draft Policy STR/SS 3). This represents almost 75% of all new homes planned for through the emerging Local Plan (taking the upper range provided at Table 4; 78% if taking the lower range). There is, therefore, significant reliance on the delivery of new homes from these two strategic sites.

3.8 It is common for it to take some time to see homes delivered on large -scale, strategic sites owing to, inter alia, the complexity of the planning process, landownership and often significant new infrastructure requirements. In the case of the proposed allocations at Paddock Wood and Tudeley Village this includes new schools, neighbourhood centres, employment and sports, health and community facilities. Moreover, Framework Masterplan SPDs are requirements of the draft policies, to be adopted in advance of planning permission being granted, which will add significantly to the overall planning process. Furthermore, the use of Compulsory Purchase Order powers is referenced in both allocations indicating anticipated issues with landownership.

3.9 The Housing Supply and Trajectory Topic Paper for Pre-Submission Plan (February 2021) identifies delivery of homes from both strategic allocations from 2025/26, with 300 homes completed per annum from Paddock Wood/ East Capel and 150 from Tudeley Village (see Table 9, page 30). Given that Framework Masterplan SPDs are required before planning permission can be granted, it is already halfway through 2021 and significant infrastructure is required to 'unlock' the sites, delivery of homes from these allocations within the next four years is ambitious. Delivery of 300 homes in the first year from Paddock Wood/ East of Capel is very ambitious, as is 150 from Tudeley Village.

3.10 Whilst it is accepted that strategic allocations are required to meet longer term and large -scale housing needs, the emerging Local Plan ought to be realistic as to when and how many homes can be expected from these sites. Further, it should seek to identify a large number and range of small to medium sized allocations to provide for local housing needs and a consistent supply of new homes to account for the risk of delays from larger allocations. Placing such reliance on the delivery of homes from only two strategic sites is a high-risk strategy that could see the historically poor delivery of homes in the Borough continue and/ or worsen.

4.0 SITE ALLOCATION

4.1 Hermes House and the land to the rear ('the Site') provides an opportunity for an additional residential site allocation in Royal Tunbridge Wells within the emerging Local Plan. The Site has not previously been submitted to a Call for Sites and is not included in the Strategic Housing and Economic Land Availability Assessment (January 2021). The previous Call for Sites were held in 2016 and 2017 which was prior to Logistics UK considering relocating to a more appropriate site within Royal Tunbridge Wells.

4.2 For the reasons outlined above, Hermes House is not considered an appropriate employment location and has not been protected by the Council from changing use to residential, albeit this is not a feasible option given the inherent issues with the current buildings. Additionally, the land to the rear does not provide an active educational or recreational function and, if included with Hermes House, could provide a logical extension to the built -up area to create a high-quality residential development that delivers much-needed new homes in the short -term.

4.3 The Limits of Built Development boundary would require a minor adjustment to include that part of the land to the rear of Hermes House that currently falls outside. This area of land is surrounded on three sides by the current Limits of Built Development (i.e. it is inset) and the realignment of the boundary in this location would result a in logical 'squaring off' of the boundary with very limited visual impact.

4.4 Vehicular and pedestrian/ cycle access to the Site would continue to be taken from St John's Road from the existing or a relocated single access point.

4.5 It is envisaged that building heights will reflect the prevailing residential heights within the local area.

4.6 The homes would be provided as a range of private and affordable tenures and across a variety of dwelling types and sizes to cater for a wide range of households.

4.7 The suggested provisions of a site allocation for this Site are as follows:

Land at St John's Road (Hermes House)

This site, as defined on the Royal Tunbridge Wells Policies Map, is allocated for residential development providing approximately 50 dwellings, of which 30 percent shall be affordable housing.

Development on the site shall accord with the following requirements:

- 1 Vehicular access, delivery and servicing should be provided from St John's Road.**
- 2 Provide a landscaped boundary to the new Limits of Build Development.**
- 3 The design shall include appropriate measures to address the impact of the proposal on the gardens of neighbouring residential properties on St John's Road.**
- 4 Provision of on-site amenity greenspace/ high-quality landscaping.**

5.0 EMERGING POLICY MAP/ POLICIES

Limits of Built Development

5.1 Current adopted policy (Core Policy 2) seeks to protect the Rural Fringe from development with this land only released through adoption of a development plan document (i.e. site allocations DPD). The emerging Local Plan does not seek to take forward the Rural Fringe designation which Logistics UK supports. However, part of the land to the rear of Hermes House would remain outside of the Limits of Built Development. This land is inset from the boundary of the Limits of Built Development and adjustment in this area would represent a logical 'squaring off' of the boundary. This would have very limited visual impact given the small scale of the adjustment but would optimise the delivery of new homes in a high-quality development to meet local needs for homes of different types, sizes and tenures.

5.2 We suggest that the Limits of Built Development boundary should be adjusted to reflect the western extent of the Site boundary as shown on the Site Location Plan (drawing reference 2104/FS/001).

Employment

5.3 The emerging Local Plan (draft Policy ED 2) seeks to protect existing employment buildings/ sites regardless of their location and compatibility with neighbouring properties. It is our position that this is a failing of the emerging policy. Not all existing employment buildings/ sites will be appropriate for this level of protection (for example, Hermes House) and the policy should not assume this to be the case. Express wording is required to acknowledge this situation and allow for change of use away from employment -generating use where this is not appropriate owing to reasons of, inter alia, neighbourliness, residential amenity and compatibility of land use.

5.4 NPPF paragraph 81(d) requires planning policies to 'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances'. As drafted Policy ED 2 provides a rigid policy framework in respect of existing employment sites/ buildings with blanket protection that takes no account of local circumstances and does not provide flexibility for businesses to adapt and evolve. This conflicts with NPPF paragraph 81.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To debate the issues with such heavy reliance upon housing delivery from just two sites.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_47

Comment

Consultee	David Lovell [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Five Oak Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	David Lovell [REDACTED]
Comment ID	PSLP_872
Response Date	02/06/21 09:27
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Development Map of Capel.docx (1)
Question 1	
Respondent's Name and/or Organisation	David Lovell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Poilicy STR/SS1 - Strategy for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

- Do you consider that the Local Plan is not sound because:
- . It is not positively prepared
 - . It is not effective
 - . It is not justified
 - . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

General Comment

I am a resident of Capel, living in Five Oak Green between the two strategic sites proposed for this rural parish. I live here because of the beautiful countryside, the historic landscape, a closeness with nature and wildlife, and being part of a small close-knit community. All of that, and more, will disappear if TWBC get their way with their lop-sided plans for the area.

My background is in law enforcement. I worked for the Home Office in the UK and abroad for many years, before retiring from the National Crime Agency in May 2019, the month Capel learnt of the shocking proposals in the Local Plan. I have been involved with the Save Capel campaign since then, and as Chair from December 2019 to February 2021. I take an active role in the Biodiversity Team and have made a comment below.

However, with my past in law enforcement, I am concerned by some aspects of TWBC Planning Services' activity during the planning process. Rather than a review of evidence leading to a conclusion, evidence appears constructed or omitted to support a pre-determined conclusion. I have noticed inconsistency, a lack of evidential disclosure and a disregard of public opinion, and therefore intend to focus on my concerns relating to process.

But, to be clear, I object strongly to the Local Plans for Tudeley and East Capel which are unbalanced, ill-considered, deeply unpopular, unsustainable and, I believe, unsound. My reasons follow below.

National Policy

The sites at Capel and Paddock Wood have been pursued by TWBC Planning Services as their desired strategic options for the Local Plan since at least early 2019, however unsustainable or unpopular those options transpire to be. The effort to justify that pursuit might help to explain the volume of inconsistent decisions, misleading statements, a lack of key assessments, and a disregard of public opinion and the intentions of the NPPF. This is not a complete list:

- . Despite often quoted in the Local Plan, the NPPF has been turned on its head to suit the pre-conceived solution to the Borough's housing needs through development of the green belt at Capel.
- . The NPPF states brownfield sites should be developed first and greenfield as a last resort, but the Local Plan's primary focus is greenfield. The AONB and its setting are key, but Tudeley borders the AONB and is intrinsic to the setting between high and low weald.
- . The green belt should be preserved; but the plan undermines it, creating an urban sprawl from the edge of Tonbridge, merging Tudeley and Five Oak Green with Paddock Wood.

- . Flood zones should be avoided, but the site at Tudeley lies adjacent to and within a flood zone, and the site at East Capel is primarily within a flood zone. Flooding is already a problem in the area, as has been seen throughout the Local Plan process, with serious floods in 2019 and 2020, and run-off can only exacerbate the problem for residents and neighbours downstream.
- . The town of Tunbridge Wells itself is economically stricken; streets are strikingly full of closed shops and empty offices and, with the move to home working and internet shopping, that situation can only get worse. However, rather than take the opportunity to focus on a post-pandemic world and urban regeneration, the Local Plan continues with a backward-looking focus on greenfield development and environmental damage.

Inconsistency

To reach their desired conclusion, the Council has led itself into a maze of contradiction. Reasons for rejecting one site often pertain to another site that is selected, and sites that are selected appear more unsuitable than others that have been rejected. At best, this is a lack of communication between officers, at worst evidential manipulation:

- . Many smaller sites have been rejected as impinging on the Green Belt, even within Capel, but the two sites that will erase the Green Belt in the area have been accepted. Equally, sites in the AONB have been accepted, but not that at Castle Hill (submitted as an alternative to Tudeley and supported by Save Capel) despite its obvious sustainability advantages. Significant flood risk has also been put aside for the strategic sites, whilst sites not prone to flooding have been rejected (Castle Hill as one example). To the lay person this looks like double standards.
- . Despite TWBC's oft-repeated claim that removal of Green Belt is justified as the Borough is restricted by designated land, **over 25% of the Borough is undesignated**. Very little development is taking place in this area. The 'very special circumstances' for Green Belt removal appear to be simply 'that's where we want to build.'
- . A primary purpose of the Green Belt is to prevent urban merger, which is precisely what will occur if the proposals across Capel proceed. The David Lock Associates (DLA) report admits there will be 'perceived' coalescence with the expansion of Paddock Wood at East Capel and Five Oak Green (FOG) / Whetsted in Capel. STR/SS3 states the Tudeley site is close to Five Oak Green '...but physically separate...' **That separation is one field to the south, which will be carved open by the proposed FOG by-pass**. An urban sprawl will be created from Paddock Wood through FOG and Tudeley to the doorstep of Tonbridge, effectively removing the Green Belt.
- . Maps of the Capel sites are focused on the proposed boundaries and do not reflect the situation that exists on the ground, disguising the merger the developments will cause, and the extent of green belt loss. To the west, FOG will be separated from the new town at Tudeley by a single field south of the B2170, which is bordered to by Church Lane and Hadlow Estate building works at Tatlingbury Farm; a further site for a small development also has planning permission in the eastern side of the field at Sychem Place. There are two smaller fields separating Capel Primary School from the village, bordered by the B2170 and railway. To the east, buildings which constitute the village adjoin the A228, which will be the only barrier between FOG and the expanded Paddock Wood; the situation is similar with Whetsted. The stand-off between FOG and the strategic sites is minimal and I believe the Local Plan mapping camouflages the true extent of the merger across Capel. A visual visit will confirm the reality, but I have attached a map which I believe shows a truer picture of the merger effect.

Alternative Sites

The failure to be objective is amply demonstrated by TWBC's lack of pro-active research in undesignated areas and failure to properly consider alternative sites:

- . A decommissioned prison (Blantyre House) in the undesignated areas was rejected as too small and, as a late submission, was not be properly appraised. However, minimal research shows land around the prison is also owned by HMG, with a capacity of 2,500+ dwellings and the advantage of being close to a railway station, unlike the site at Tudeley.

- Two further sites might have combined with this land (SHELAA 9 & 325), and brought the potential for housing to 3,800 dwellings. However, both sites were rejected as ‘...remote from the settlement centre...’, which might equally be applied to Tudeley. Incredibly, Site325 was also rejected as ‘...a strategic site of a scale harmful to the AONB landscape.’ However, the AONB lies at a distance of 1.15miles to S325, whilst Tudeley lies directly alongside the AONB and the impact on its setting and the historic landscape is inescapable.
- An alternative site to Tudeley was supported by Save Capel at Castle Hill, which remains within Capel’s Green Belt, but also in the AONB. It was rejected primarily for that reason, despite being adjacent to a significant commercial development which was backed by the same planning officers, which is also in the AONB. **Other comments are given in more detail in my response to STR/SS3.**
- The Procedure Guide for Local Plan Examinations (Local Plans: the examination process - GOV.UK (www.gov.uk)) states in 1.11: ‘Plans which allocate sites for development will need to be supported by evidence demonstrating that the LPA has followed a logical and consistent method to identify and select the allocated sites, and to reject alternatives.’ I would suggest that the evidence shows that the Local Plan is riddled with illogical and inconsistent methodology designed to justify the strategic sites in Capel, however unsustainable they may be, and is therefore unsound.

Duty to Co-operate & Misinformation

Misleading and inaccurate statements have been a feature of the Council’s dealings with the community in Capel, including claims of long-standing cooperation with neighbouring boroughs:

- In claiming that TWBC have complied with the **Duty to Cooperate**, at the Planning Advisory meeting on 05/08/2019, Head of Planning told Councillors that officers had consulted with other boroughs throughout. However, on 24/07/2019, 12 days before the meeting and 3 months after the Tudeley proposals became public, Tonbridge & Malling Borough Council’s Planning Officer advised; “On TWBC – we have had Duty to Cooperate meetings with colleagues there, but these were before they proposed the sites in their reg 18 plan – the principle of new settlements was mentioned but there were no sites identified at that time.” The suggestion that neighbouring boroughs were aware of the proposals for Tudeley, and East Capel, ‘throughout’ was misleading, if not disingenuous.
- At an initial meeting with the community the Head of Planning Services indicated that the ease of dealing with a single landowner was a primary factor in the Council’s decision to settle on the site at Tudeley. This was subsequently denied, but I understand exactly the same condition was attached to the Castle Hill proposals. This has irked residents who feel that officers are paid to take the right decisions, not the easy ones.
- At a TWBC Planning Advisory meeting on 05/08/2019, the Environment Officer claimed agricultural land in Tudeley and East Capel was ‘poor quality’. However, TWBC’s own assessment in a Development Constraints Study, shows the land as Grades 2 and 3; defined by Natural England as ‘Very Good’ and ‘Good to Moderate’. Grade 4 is ‘poor’ and none exists in the sites.
- Nonetheless, in an email of 15/10/2019, Head of Planning insisted again that land quality was ‘poor’, a misrepresentation potentially explained in the same response: ‘Particular attention will be given to: i) The grade of agricultural land and agricultural activities to minimise the effects on the rural economy and agricultural functionality...If the land is ‘poor’ the loss would have little negative agricultural impact; loss of productive land is hard to justify – and remains so (Policy EN20).

Disclosure and omission

Many important aspects of the strategic sites in the PSLP are either based on assumption or left to the planning application stage when they will not be subject to independent scrutiny. The importance of these omissions gives cause for concern that assessments and process are being selected to avoid negative outcomes for the chosen sites:

- The claim there will be ‘...an opportunity for betterment to the flooding and drainage issues which are present for residents of parts of Paddock Wood, and ecological and landscape enhancements as part of the exceptional circumstances case for the release of this Green Belt land...’ (PSLP

5.183) suggests such enhancements are not decided, in which case the exceptional circumstances the Inspector needs to consider are yet to be described.

- . TWBC commissioned David Lock Associates (DLA) to assess deliverability of the East Capel and PW proposals, but the work appears unfinished as ‘...*further detail on phasing and mix of dwellings is required...*’. Nonetheless, TWBC concluded that ‘...*viability of the growth here is justified.*’ (PSLP 5.177) Without such important work, viability seems a leap of faith.
- . No Cumulative Impact Assessment on the effects of the developments across Capel, including the KCC gravel extraction, has been done and there is no indication one will be commissioned. This is a key consideration given the clear impact that the combined works will have on biodiversity in the parish, and which is likely to show that biodiversity will be squeezed. It is perhaps not surprising therefore that such an assessment has not been readied for the Regulation 19 inspection.
- . No Environmental Impact Assessment has been completed for either strategic site, despite their key importance to the Local Plan. TWBC advise these will be left to planning application stage – so avoiding the results forming part of the independent examination. Moreover, a strategic EIA for both developments upon the parish would ensure a rounded consideration of facts, but this does not appear to be something TWBC wish to pursue.
- . The so-called Five Oak Green by-pass that will connect the new town at Tudeley to a (currently unfunded?) Colt’s Hill by-pass for the A228 starting at East Capel, appears to be another incomplete proposal with the plan omitting trees, unlike the other Colts Hill plans in Other Reports Template (tunbridgewells.gov.uk).
- . It would appear to make more sense to route the Five Oak Green by-pass north of the village from the new town at Tudeley to the A228 and East Capel. This would pass through land belonging to the same landowner and service the proposed gravel extractions. Instead, there will need to be two roads, north and south, which would incur additional and unnecessary loss of green belt. The reasoning is not clear, but could be because the southern route would cosmetically plan for traffic towards Tunbridge Wells, when the reality is most would head to Tonbridge or Paddock Wood. (This might explain the curious proposal to seal off of the road into Paddock Wood from the Hop Farm roundabout). It might also help reduce costs to the developer, as the proposals look increasingly unviable financially if the northern part of the Tudeley site is ever to see construction.
- . The plan for the Five Oak Green by-pass may also be deliberate opaque so as to avoid examination at Regulation 19; as the Council wrote to one of the landowners: ‘... *if the plan is found sound by an Inspector... it is unlikely a planning application for the Five Oak Green bypass will be submitted until after this time.*’ I would question the legitimacy of leaving so much that is fundamental to the Local Plan to a later date, rather than producing hard evidence for scrutiny.
- . The most important omission is the failure to include the Hadlow Estate (HE) Masterplan and Delivery Strategy in the TWBC bundle for the Regulation 19 inspection. **This is a significant failure in the disclosure of vital evidence.**
- . Furthermore, in a response to a query on this matter, the Strategic Sites & Delivery Team Leader wrote ‘...*given the document is on the Hadlow Estate’s website, in the public domain, it was not considered necessary to include it on the TWBC website at this time.*’ This reasoning suggests the documentation not only could have been included but may be later, presumably at a time more convenient to the Council’s aims. Like other documents that might reflect negatively on the proposals, the presumption is this will be at the planning application stage when the Council can perform its own scrutiny of the documentation, with predictable results. This is a further example of what appears to be a manipulation of process to ensure an outcome, and renders the Local Plan unsound.

Public Opinion

Whilst TWBC talk about public engagement in the Local Plan process, it has been almost entirely negative and routinely ignored:

- . In TWBC’s 2017 Issues and Options document the public voted overwhelmingly to support an A21 ‘growth corridor’ to meet housing need. This was subsequently put aside in favour of Tudeley and East Capel.
- . In autumn 2019 at Regulation 18, in an ‘unprecedented’ wave of negative engagement, 95% of 1,000 responses objected to the strategic sites at Tudeley and East Capel. The response was

ignored and, instead, Capel was handed a further 700 dwellings - in what looks suspiciously like punishment.

- . In August 2020, Capel Parish Council organised a questionnaire on the future of the Parish as a pre-cursor to work formulating a Neighbourhood Plan. Again, in an open question, 95% of respondents voiced their disapproval of the Council's proposals for Capel in the Local Plan.
- . In December 2020, Save Capel members voted by 95% to support an option at Castle Hill as an alternative to Tudeley, which would match the A21 'growth corridor', alongside the Kingstanding commercial area. This has also been rejected without full consideration.
- . In May 2021 a candidate for the role of Capel Borough Councillor, who stood on a ticket to rework the Local Plan, swept aside the incumbent Councillor with a vote of 75% of an increased turnout.
- . The Council have attempted to counter the arguments of the community through misinformation or obfuscation, rather than answering honestly or accommodating public sentiment. For example, the evening before the Full Cabinet met on 03/02/2021 to decide the fate of the Local Plan, the Head of Planning Services lobbied all councillors with a document negating many of the arguments the community had made, irrespective of merit or fact. Documents were only made available to Councillors a few hours before the meeting, which was insufficient time to make informed decisions, and many Councillors voted on what they were being told, rather than making decisions based on their own judgement.
- . The Council's disdain of public opinion was summed up by the Head of Planning Services at a Cabinet Meeting on 21/01/2021; when asked to comment on the weight of resistance to the Capel proposals stated that *"It's not a numbers game,"* adding that just because lots of people do not want something does not mean it will be stopped. In essence, the community's voice is irrelevant where it does conform to Council plans. Consultation is therefore a meaningless tick-box exercise for TW Planning Services within the Local Plan process.
- . This disregard continues. After the election in May 2021 of a Borough Councillor in Capel, who stood on a ticket supporting the community's views on the Local Plan, a Council spokesperson commented; *"The responses to the consultation came in the most part from residents of areas where development is proposed."* It begs the question why the Council bothered with a consultation if the community most affected can be dismissed so readily?

Community

Capel is a rural ward and the local community of around 2000 souls is close-knit and, to coin a phrase used by the Borough Council, 'we love where we live.' To see our countryside and community destroyed is heart-breaking, especially when we can see that the proposals are unsustainable and unsound, and quite viable alternatives are overlooked or not properly considered:

- . Capel currently consists of around 940 homes. The addition of over 4800 homes, will swamp the small but strong rural community that exists. It is very clear that the community, and those in neighbouring boroughs to be adversely affected by the proposals, are strongly against the Tunbridge Wells Local Plan as it currently stands. There is an acceptance that some level of housing is needed, but the lop-sided nature of the proposals – Capel has just 2% of the Borough's population but will bear 45% of its housing need - is far more than required in the area and Planning Services conceded many new residents will come from London and even further afield (new property in Paddock Wood is being advertised in China).
- . The community's health and well-being will be sacrificed, and the ongoing proposals are already taking their toll, as decades of construction will blight the lives of those who live here. Air, noise and other forms of pollution are inevitable, and will have an adverse effect on people's health and mental well-being. The environmental damage will be huge, our ancient and precious landscape scarred forever, irreplaceable habitat lost and, ultimately, the community drowned in a tsunami of new residents.
- . The detrimental effect on the community of over 15 years of construction across the area has not been addressed; perhaps because it cannot be if the strategic sites are to be developed. Residents are already complaining about dust and noise from the ongoing developments at Paddock Wood, which can only get worse. Countryside and open spaces are recognised to

- improve well-being, but these developments not only remove those wider green and open spaces, but air quality will suffer, noise levels will be incessant and Capel's dark skies will be lost.
- Tunbridge Wells has a policy to reduce air pollution (EN21), but the proposed developments pose a significant threat to the environment, including an increase pollution at a time of climate change. The Council are also has declared a climate emergency, but the developments can only aggravate the problem.
- TWBC aims to be carbon neutral by 2030; 6 years before the end of the Tudeley construction period. The loss of 600 acres of fields and hedgerows to large-scale development can only work against this aim, notwithstanding the Local Plan's strategic objective 10, which I note has been watered down from an earlier iteration of the Local Plan from '*to tackle climate change...*' to '*...support the goal to make the borough carbon neutral by 2030...*'. The objective continues with the promise to '*.... minimise the impact of climate change on communities, the economy, and the environment...*'. This is a fanciful statement when such large-scale construction will destroy carbon absorbing countryside, encourage greater use of cars, erase wildlife habitat and decimate the local community.
- The rejected alternative site at Castle Hill would not have so dramatic effect, being a sparsely populated area, and more sustainable being alongside a major transport artery, close to the town of Tunbridge Wells and the new employment opportunities at the Kingstanding commercial site. Moreover, combined with a focus on urban regeneration and not loss of greenfield and agricultural land, the environmental and human costs would be limited. Unfortunately, the opportunity to forge a local plan for the future that can be supported and welcomed by the public has been rejected by the Council in a preference for environmentally destructive and harmful, and deeply unpopular, proposals.
- The local population has fiercely raised its objections on several occasions but is routinely dismissed by the Council, which has also ignored the objections raised by the neighbouring authorities in Tonbridge and Malling, and Yalding in Maidstone Borough, which fear increased traffic congestion, pollution and flooding, and associated infrastructure and mitigation costs, caused by the developments. This deaf ear to public opinion cannot be considered as participation by the community as envisaged in the planning process, and renders the Local Plan unsound.
- Ultimately, TWBC's planning strategy appears to be centred on finding ways to justify the unjustifiable, with inconvenient truths placed aside to avoid examination at the Regulation 19. Rather than a positive and objective exercise on the merits of the Capel proposals, the Local Plan is a negative and subjective exercise to justify a pre-conceived conclusion. The Local Plan is peppered with inconsistency and a lack of disclosure or delay in important work, and is therefore unsound.
- The inevitable question is why a Local Planning Authority would resort to manipulation, misinformation, delay and bias if their Local Plan is 'sound'? That in itself must sow doubt on the Local Plan's soundness, and I therefore ask the Regulation 19 inspection not only looks at what is being put forward, but also what is missing.

Biodiversity

NPPF para 177 states: *The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.* However:

- There has been no **Cumulative Impact Assessment** of the effect of development across Capel, compounded by KCC gravel excavations between the two sites, and the extensive road infrastructure required to service both developments and gravel extraction. The combination of these proposed works will transform Capel from a rural ward to an urban sprawl from Tonbridge to Paddock Wood, and from the Medway to the AONB. The cumulative impact on wildlife (as well as food production, landscape, heritage assets, the local community and flooding), is likely to be far greater than each aspect of TWBC's and KCC's plans taken in isolation, yet the isolationist approach is what the authorities and developers insist on taking. It is vital a Cumulative Impact Assessment is made; however inconvenient the findings may be to the strategy of placing the majority of development in Capel and Paddock Wood.

- . In a report submitted to the TW Planning & Transportation Cabinet Advisory Board on 19/08/2019, the Landscape and Biodiversity Officer suggested better woodland management might mitigate the loss of habitat and achieve 'net biodiversity gain', but the land being lost in Capel (which forms the vast bulk of the borough's development plans) is primarily fields and orchards, and woodland management would achieve very little against the inevitable biodiversity loss. When this was pointed out the officer replied that they 'may target enhancing some farmland areas, perhaps field headlands...', whilst adding that biodiversity had declined through modern farming methods, evidently forgetting the hugely damaging effect of habitat loss through large scale developments.
- . Despite 2 years in which to do so, the Local Plan does not take biodiversity mitigation much further and wildlife dependent upon those fields and orchards face widespread loss of habitat, adding to the worrying decline in their numbers. The proposals for biodiversity gain remain vague, inadequate and destructive. The Local Plan is therefore unsound.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 Properly consider alternative sites, such as Castle Hill, which is far more sustainable than the site at Tudeley.
- 2 Take proper account of public consultation and opinion.
- 3 Use objective and pro-active research to reach the right conclusions.
- 4 Apply the proper intentions of the NPPF and national policy; protecting designated areas and focusing on brownfield and undesignated areas first.
- 5 Create a Local Plan for the future which is based on urban regeneration rather than destruction of the countryside, by taking properly into account the societal changes inevitable in a post-covid world; making use of empty shops and offices as dwellings to regenerate TW's towns by increasing footfall to generate business for independent retailers.
- 6 Focus on protecting the environment and preventing climate change, rather than targeting the erasure of countryside and communities; protect the health and well-being of residents rather than adding pollution and disruption, and take proper and realistic account of the threats (such as increased pollution, traffic congestion, infrastructure costs and flood threat) the strategic sites pose to residents and neighbours.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been involved with the Save Capel campaign since May 2019, acting as Chair for 15 months. Currently in the campaign's Biodiversity team. I can produce evidence of what I am saying in my submissions at the hearing, if required.

If you would like to attach a file in support of your comments, please upload it here. [Development Map of Capel.docx \(1\)](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Joanna Mackenzie [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Joanna Mackenzie [REDACTED]
Comment ID	PSLP_993
Response Date	02/06/21 22:20
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Joanna Mackenzie
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I have lived in Paddock Wood since 2005, 16 years. Before that I lived in Brenchley. I live with my husband of 14 years and our 8 year old twins who attend Paddock Wood Primary Academy. Prior to Covid-19 my husband owned and worked in the Print Shop on Commercial Road. I work for a company in Tunbridge Wells and I got the train to and from Tunbridge Wells.

I disagree with so many aspects of this sections of the Draft Local Plan for Paddock Wood that I have not known where to start.

The current Infrastructure is not viable. I walk around Paddock Wood at least three times a day between my home in Hunters Chase, Paddock Wood Primary and the town centre. I also walk around the local countryside with my dog. The traffic increase I have seen, even from Mascalls Grange is hugely noticeable. How will Paddock Wood will cope with the increase in traffic from the builders/contractors as well as the home owners? I actually, do not know.

There will not be enough seats on trains (and there's an issue with length of platform so the rail company will not be able to just add more carriages.) Network Rail have suggested they will not increase the width of the current road bridge - indeed this bridge has been mentioned in vehicle access over the railway bridge except for bus services (201124_LCWIP+ Final Report, Page 56 4.12). Paddock Wood and it's residents as well as the ambulances and lorries which rely on Maidstone Road will grind to a halt. Badsell Road floods often during the autumn and winter months, so I am not sure where the traffic will go? Paddock Wood is surrounded by country roads and simply will not cope with the increase in traffic.

Paddock Wood has one primary school. The school planned for Mascalls Grange has not been built due to a low birth rate - so what will happen to the 100's of children arriving in their new homes? Capel School is a tiny village school, as is Brenchley and Matfield and Laddingford. Is there a plan for this scenario?

There has been a noticeable increase in crime locally - with drug misuse and petty crimes being noticeable. There is not a police presence and, indeed, the police station has just been demolished so we no longer have a police station in the size of town we are now; let alone the size of town we are becoming.

The draft local plan for Paddock Wood highlights areas that fall within category 2 and 3a flood risk areas. Residents in East Paddock Wood have had to spend thousands of pounds purchasing their own pumps due to regularity of flooding down Castle Hill, Mile Oak Road and Queen Street. These areas are currently surrounded by apple orchards and blackcurrant fields which are assisting to disperse the run-off, but if these are developed the situation will be exacerbated.

Paddock Wood Surgery is already severely oversubscribed. Within the past few years the radius was extended towards Pembury and with the sudden growth within Paddock Wood from Mascalls Grange Estate plus the building of Foal Hurst Green and Church Farm Estate means that trying to get an

appointment is almost impossible. Regarding the health of Paddock Wood, I know there has been an increase in breathing issues locally with the increase in traffic and dust created by the building developments surrounding Paddock Wood; let alone the increase in traffic.

I feel passionately about Paddock Wood and its residents. Paddock Wood simply can not handle the amount of houses planned for it. It is as simple as that - the Infrastructure is simply not there. I feel incredibly sad that the next 15-20 years will consist of dust, lorries, work trucks and a vast increase in traffic.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Planning and Development ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Maidstone Borough Council
Address	Maidstone House King Street MAIDSTONE ME15 6JQ
Event Name	Pre-Submission Local Plan
Comment by	Maidstone Borough Council (Planning and Development - [REDACTED])
Comment ID	PSLP_2260
Response Date	07/05/21 17:12
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Maidstone Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: the full representation has been divided between comments on the whole Plan with regard to Duty to Cooperate (PSLP_2258), Policy STR1 (PSLP_2259) and Policy STR/SS1 (PSLP_2260).

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Thank you for consulting Maidstone Borough Council (MBC) on the draft Tunbridge Wells Borough Local Plan (TWBLP). Maidstone Borough Council's comments on the draft plan are detailed below.

The strategy for Paddock Wood, including land at east Capel (policy STR/SS 1)

It is noted that the expansion of Paddock Wood (including land at east Capel) will seek to follow Garden Settlement principles and provide flood risk solutions. The Council-led approach to masterplanning the area, which is to take the form of SPD, is also noted. MBC will of course continue to engage in the regular Strategic Sites Working Group meetings as the masterplan SPD progresses.

Policy STR/SS1 details the strategy for development at Paddock Wood and east Capel, including approximately 3,490-3,590 dwellings; 3 neighbourhood centres providing approximately 2,000sqm total; and other associated infrastructure to serve the local needs. Proposals for piecemeal development will be resisted. The overall policy approach is considered to be suitably comprehensive and MBC raises no further comments or objections in this regard.

I hope these comments are helpful and look forward to continuing, constructive dialogue on strategic, cross boundary issues as part of the duty to cooperate as our respective Local Plans progress.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Sarah Marchant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Sarah Marchant [REDACTED]
Comment ID	PSLP_974
Response Date	02/06/21 16:29
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Sarah Marchant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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This land is Green Belt land and should only be built upon if an “exceptional circumstance” exists. TWBC’s own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan’s aims without using the Green Belt land at East Capel. There is thus no need to further threaten the Green Belt land within the parish of Capel. My comments on STR SS1 about the creation of a conurbation from Paddock Wood right across to Tonbridge is very relevant here, as is the land’s use as a flood plain. Building here, even with flood risk mitigation and “betterment” could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the growing impact of climate change for current and future generations.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Susan Marchant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Susan Marchant [REDACTED]
Comment ID	PSLP_343
Response Date	24/05/21 16:29
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Susan Marchant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

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Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Five Oak Green for 43 years and am dismayed at the proposals for land at East Capel. This is Green Belt land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel. It will merely facilitate the creation of a conurbation from Paddock Wood right across to Tonbridge and complete the destruction of a rural parish rich in heritage, agriculture and natural habitat.

The land is used as a flood plain and as such is not recommended for housing. Building here, even with flood risk mitigation could have disastrous consequences. The measures being looked at are not based on current data and do not fully consider the impact of climate change. There is no advantage to anybody in pursuing development in this area.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Roger Maxted [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Roger Maxted [REDACTED]
Comment ID	PSLP_980
Response Date	02/06/21 17:27
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Nicola & Roger Maxted
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1 for Paddock wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I moved to Golden Green in May 2003 and have noticed a considerable increase in traffic since then, especially in the daily commute from Golden Green to Tunbridge Wells. Traffic congestion is worse than ever.

School and nursery places are increasingly harder to find. In fact no new primary schools have been built in this area since we moved in.

The same is true of local GP surgeries. The nearest surgery to us closed a few years ago.

Since 2003 the services in the areas have worsened eg. the fresh water quality and the electricity supply is unreliable.

The local flooding restricts access to our home in heavy rain conditions.

The environment is being destroyed by overdevelopment of the green belt.

There are already not enough services for this overpopulated portion of the South-East of England to envisage a development of this nature.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

Comment

Consultee	Victoria Maxted [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Victoria Maxted [REDACTED]
Comment ID	PSLP_981
Response Date	02/06/21 18:13
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Victoria Elizabeth Maxted
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1 for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

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Question 5

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Weald of Kent Grammar School and Bennett Memorial School; all in the local area. Over the years I have seen many properties be built on green belt land and not brown belt. Most recently, 4 houses in Golden Green built on METROPOLITAN GREEN BELT LAND. I remember saying as a 10 year old to my parents that I should save my pocket money to buy a piece of green belt and in 10 years time, I'd be able to build a house on it. My parents told me that green belt was for protecting the environment and that everyone should build on brown belt. 12 years later, houses are popping up all over green belt and every pub seems to be being turned into houses (see East Peckham and Hadlow). I should have saved my pocket money - the environment doesn't seem to matter to you.

You can see we are damaging our environment. Look at the flooding we have. As a village, when there is heavy rain, we are blocked in to the village through the River Bourne and River Medway. Even the buses can't enter the village.

Speaking of buses and traffic. The local traffic is appalling. Weald of Kent was our nearest school (3.1 miles according to the council). School finished at 3.35pm everyday. I would not get home until 5pm due to the 208 bus. At least once a week it also would not come. I did the journey just this week (half term holidays) from Weald to Home - 12 minutes. And yet 85 minutes plus at school time. Ridiculous.

I feel that the Garden of England is being turned into a building site. Everywhere we look, there are builders and scaffolding. The Garden of England is called The Garden of England because we're suppose to have greenery and beauty. I know Tunbridge Wells has lost its ROYAL but don't let Kent lose its GARDEN. Try saving the environment.

Question 6

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Build on Brown Belt - improves the environment by protecting the environment we are SUPPOSE to be protecting.

Council Tax to go to Tonbridge and Malling - Council tax is designed to improve infrastructure in the local area. The road from Paddock Wood, Capel and Tudeley is already overcrowded with dangerous road conditions and traffic. Try putting money into the roads that YOU want to populate further.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_76

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	International House Dover Place ASHFORD TN23 1HU
Event Name	Pre-Submission Local Plan
Comment by	Natural England [REDACTED]
Comment ID	PSLP_1469
Response Date	04/06/21 13:41
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1444_Natural_England_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Natural England
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC - Full representation attached as Supplementary Information]

[TWBC: This representation has been input against Policies PSTR1, AL/RTW17, AL/CRS 1, AL/CRS 2, AL/CRS 3, AL/HA 4, AL/BM 1, AL/PE 1, AL/PE 2, AL/PE 3, AL/RTW 16, STR/SS1, STR/SS3, EN11,

Section 3, STR 8, Section 5, EN1, EN9, EN10, EN12, EN13, EN14 AND EN19 – see Comment Numbers PSLP_1444, PSLP_1459, PSLP_1460, PSLP_1462, PSLP_1489, PSLP_1463, PSLP_1464, PSLP_1465, PSLP_1466, PSLP_1467, PSLP_1468, PSLP_1469, PSLP_1470, PSLP_1472, PSLP_1478, PSLP_1480, PSLP_1481, PSLP_1482, PSLP_1483, PSLP_1484, PSLP_1485, PSLP_1486, PSLP_1487, PSLP_1488]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with national policy

Question 5

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Appendix 4: Strategic site allocations in the setting of the High Weald AONB (STR/SS 1 and STR/SS 3)

Natural England advises that careful consideration is made regarding the significant level of development allocated in the setting of the AONB. This includes the draft allocation for 3,490-3,590 dwellings at Paddock Wood/East Capel (STR/SS 1), and the draft allocation for 2,800 dwellings at the garden settlement at Tudeley Village (STR/SS 3). Whilst in principle we do not object to these allocations, we advise a sensitive approach be taken regarding the significant impact the proposals may have on the AONB setting.

Natural England welcomes the policy commitment to produce Framework Masterplan SPDs to set out how these strategic allocations will be designed and delivered. Natural England advises that these sites should be very sensitively designed, using a landscape-led approach informed by the AONB management plan, to ensure the impacts to the setting of the AONB are avoided and mitigated. Sensitive design can include reflecting the local vernacular in terms of built design and materials, respecting existing settlement morphology, and how that settlement relates to the wider landscape both visually and in terms of physical connectivity, and supported by appropriate green infrastructure.

Natural England recognises that further detailed policy will emerge as the master-planning work continues and the supporting SPDs are produced. We advise that improvements should be made to the proposed policies for any subsequent policy writing for these strategic site allocations. Making changes at this early stage should help to ensure that appropriate masterplans are produced and high-quality development that maximises environmental gains comes forward. This should help TWBC to achieve its stated vision of new, sustainable infrastructure and excellent service provision (point 5.179 regarding Paddock Wood) and the highest standards of design (point 5.199 regarding Tudeley

Village), while also helping to address this substantial level of development within 0.7 mile of the High Weald AONB.

We are committed to working with TWBC to help secure sensitively-designed and sustainable development for these strategic allocations and advise that TWBC also seeks and uses the advice of the High Weald AONB Unit.

Tudeley Village

We welcome the reference to consideration that should be given to key landscape characteristics (Policy point 7b). However, landscape impacts on the AONB and its setting require sensitive consideration given the scale and proximity to the AONB boundary. Therefore, Natural England advises that this policy is strengthened to make a landscape-led approach integral to the policy for this strategic development by making the following improvements:

- require a high quality and detailed Landscape and Visual Impact Assessment (LVIA) and landscape capacity study as part of the application
- strengthen wording around need for considerable detailed assessment of mitigation options, including quantum, location, density, height and design of buildings
- require an overarching Green Infrastructure (GI) strategy for the garden settlement which includes a functional assessment of existing GI assets and apply consideration of the needs of the new community. This should include what function is needed and where, and what type of GI is needed to deliver it, and how this will be managed in the long-term.

We welcome principle 8 (point 5.223) which commits to good quality green and blue infrastructure. Given the impacts and opportunities that come with this scale of development, we advise that the wording is strengthened to show a clear commitment to delivering environmental net gains. Instead of 'considers opportunities', we suggest wording that looks to embrace the opportunities by delivering environmental net gains should be used. This should be integral to this strategic development from the outset.

As part of this, we advise that this strategic site allocation is given particular consideration within TWBC's upcoming SPD for Biodiversity Net Gain (EN 9), given the opportunities for taking a nature recovery network approach when designing and planning at this scale that maximises the benefits of biodiversity net gains through connected ecological networks that support local priorities. As part of good quality green and blue infrastructure, we also advise that Sustainable Drainage Systems (SuDS) that maximise landscape and biodiversity value are prioritised and should be mentioned in the policy. Policies should also make it clear that any green infrastructure is managed and maintained. These suggested changes should be made within the policy summary itself to give them an appropriate level of emphasis.

We recognise that point 5.228 suggests that the provisional LBDs are not fixed at this point and we advise that these should be determined by landscape-led approaches and ecological considerations, including consideration of ancient woodland that is adjacent to the site. This should be supported by appropriately detailed ecological studies carried out at key stages of the masterplan and early design.

We suggest that point 5.229 should be stronger by making the following wording changes: 'The SPD will need to be adopted before any planning permissions for ~~substantial~~ new development at Tudeley Village are granted, **which would be considered to pre-empt the vision of strategic development before it has been appropriately scrutinised**, unless exceptional circumstances arise' We welcome point 5.227 and suggest this would be stronger if it directly references national and local net-zero carbon commitments and the climate emergency, to ensure it is clear what is being targeted here.

Paddock Wood and East Capel

There are several comments made regarding Tudeley Village which also apply to Paddock Wood, including our advice that environmental net gains should be an integral part of the strategic policy, the importance of taking a landscape-led approach, including for determining the LBDs, and the reference to net zero carbon targets (point 5.188).

We support point 5.161, which promotes the design principle of maintaining a strong tree belt and its connection with nearby ancient woodland (point 5.162).

We welcome the principle of using nature-based solutions that is evident in proposals for Paddock Wood Wetlands Park as a significant new area of natural open space which provides multiple benefits.

We are pleased to see the recognition that this strategic site should be a source of reducing flood risk, particularly given the land that is in flood risk zone 2/3 and advise that a policy requirement is added that will require SuDS and Green Infrastructure as an integrated part of future development due to the multiple benefits this can bring including ecological enhancement.

Question 6

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Natural England welcomes the reduction in scale and number of major development site allocations within the AONB since the Regulation 18 stage of the draft local plan, but we do not consider the current draft local plan to be sound and have highlighted our reasons in our full response letter for this regarding the remaining major development allocations within the AONB. We advise that these allocations should not be pursued, and alternative options should continue to be explored. While we have objected to major development proposed within the AONB, we remain committed to the plan-led scrutiny of the proposals to ensure soundness of approach, which enhances the High Weald's highly valuable and special landscape for future generations. We wish to work with TWBC to help ensure the best possible outcomes for the AONB and the environment.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Natural England are a statutory consultee for local plan consultations and, under the CROW Act, have powers regarding AONBs. The development strategy and major development allocations within the AONB are the core reason for why we consider the local plan as unsound.

In addition, Natural England objected to a planning proposal (20/00815/FULL) for the Turnden Farm site (AL/CRS 3) in 2020 and requested that the decision by TWBC to approve the development was called in by the Secretary of State. The proposal is now subject to a Public Inquiry which Natural England is engaged in as a Rule 6 party.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Appendix 3: Sustainability Appraisal

There are several alternative growth strategy options within the Sustainability Appraisal (SA) and the Council has chosen a growth strategy with significant negative landscape impacts. Natural England's view is that the preferred approach should afford sufficient weight to environmental factors. This is supported by NPPF Paragraph 8 which states that economic, environmental and social objectives need to be pursued in mutually supportive ways to support net gains across each of these objectives. Paragraph 32 also states that (emphasis added):

'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements (The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.)'. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). However, the SA appears to prioritise social and economic considerations over environmental ones as Section 6.2.19 states:

'The term 'preferable' is used in this sense to mean the option that has the highest scores for the economic and social pillars, and the least negative scores for the environmental pillar'

We also refer to Paragraph 11(b) of the NPPF which states that:

"(b) 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;"

Given the provisions of paragraph 11 (and consequently paragraph 172), we consider that the weight afforded to protecting nationally designated landscapes has not been sufficiently considered as part of exploring alternative options and the environmental value of the AONB has been underestimated. It is our view that significant impacts have not been avoided as far as possible and, as outlined in other sections, we advise that major development within the AONB has not been appropriately justified. Given the above, we are concerned that the underpinning assessment and recommendations of the SA are not giving an appropriate level of consideration for the environmental benefits associated with alternative growth strategies, especially given the great weight that should be afforded to designated landscapes.

Natural England has significant concerns that the SA underestimates the value of avoiding major development within the AONB and the scale of impact of including it. The chosen growth strategy achieves a very positive score ('+++') for housing as it assumes it will meet standard housing need and local housing needs across the borough. However, it scores neutral or negative scores for environmental factors, including 'slightly negative' ('-') for Landscape, despite the scale and size of major developments directly within the AONB and its setting including the large strategic sites at Tudeley and Paddock Wood.

As outlined in other sections of this letter, our view is that we consider that securing effective enhancement and mitigation measures for major development within the AONB is very challenging and therefore scores for environmental/landscape factors are likely to be overstated in the SA conclusions. Similarly, the SA finds that sites such as Turnden (AL/CRS 3) are still allocated despite scoring a very negative score for landscape (Appendix J, Page 321).

Furthermore, for Growth Strategy 2 (no major development within the AONB), climate change is scored as negative ('- -' in table 14) despite having lower growth in the AONB and Borough compared with Growth Strategy 13 (adopted approach for Pre-Submission Local Plan) which includes higher growth and major development within the AONB but only scores slightly negatively for climate change ('-' in table 25). It is our view that Growth Strategy 2 would reduce carbon emissions associated with transport and new dwellings as well as carbon sequestration (which is not mentioned in the SA) when compared with Growth Strategy 13.

Given the scale of development within the AONB and its setting in the chosen growth strategy, we also question the neutral score given for biodiversity. While we support biodiversity net-gain, approaches should be in addition to applying the mitigation hierarchy which should aim to avoid negative impacts

on biodiversity in the first instance. As the SA states that nature conservation designations are more common in the AONB, we advise that any benefits for biodiversity (including those which contribute to the neutral score for the chosen growth strategy) are interpreted with some caution. Finally, point 3.2.8 does not reflect the findings of the HRA and mitigation proposed for Ashdown Forest SPA (see the HRA section below). We advise this section of the SA is amended to reflect the findings of the HRA.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

<input type="checkbox"/>	Yes, I wish to be notified of future stages of the Local Plan
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Supporting Information File Ref No: SI_122

Comment

Consultee	J Newman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	J Newman [REDACTED]
Comment ID	PSLP_1911
Response Date	03/06/21 21:27
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1904
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mrs Joanna Newman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Dear Sirs,

I believe that the planning is not effective in that it does not take into account a number of things. Firstly – infrastructure – roads and secondly flooding.

The B2017 is not fit for purpose to receive another 2000 houses/possible 4000 cars along this road going into Tonbridge. Even now, as we come out of lockdown the traffic is tailing back from Tonbridge for over a mile to the village of Tudeley. 18 months ago, before lockdown in the rush hour and during school pick up/drop off times there is too much traffic.

There is also a long queue of cars joining the B2017 at Tudeley Church, Hartlake Road. Mainly consisting of school parents, and workers who are trying to avoid Tonbridge (which is gridlocked) and who are trying to get to work in Tunbridge Wells and further south. The A26 has also long queues going back 2 miles towards Hadlow – hence people cutting through Hartlake Road.

There is talk of a pavement from Tudeley to Tonbridge – that will never happen as KCC refuse to even put in a pavement along the A26 from Hadlow to Tonbridge which is less than a mile in length. There is no way that this or a cycle path will be built.

Hartlake Road continues to flood every year as it is on the Medway floodplain. This puts added pressure on the B2017 as cars cannot cut across to Sevenoaks, Tonbridge North or any of the northern towns.

[TWBC: Photo attached as Supporting Information]

In the recent Rivers report highlighted by Ian Botham is showed that the sewage from both Tonbridge and Tudeley frequently overflows into the River Medway due to an old system and to too many people using the service and the river being too high.

How is the large community of Tudeley going to cope with this. According to Southern Water they have no plan to expand this or to improve it.

Tunbridge Wells Council and Hadlow Estates who are going to build this mini town in Tudeley also state that there will be a railway station. There is an old station which will never be reopened. This has been confirmed by senior personnel at SE Railways. So if only ¼ of the working population at this new town of Tudeley decide to work in London (which a majority in the vicinity do) they will have to drive to either Tonbridge or Paddock Wood to get a train. At the present time there is limited car parking and a waiting list. So this is not viable.

The new town of Kings Hill which was built many years ago on the old airfield had both houses and offices/industry on the same site. The idea being that people worked locally and could walk to their offices. If you travel to Kings Hill you will see that this is not the case. The majority of people in Kings Hill work elsewhere – travelling to the M20 or into Tunbridge Wells/Tonbridge and the offices employ people from Kent and Surrey/Sussex who drive in. The result being that in the rush hours the traffic does not move.

Putting another 6000 houses into the Paddock Wood/Capel/Tudeley area will cause a greater strain on the Kings Hill roads as everyone tries to get through Mereworth or along Seven Mile Lane to reach the M20.

Tunbridge Wells Council have said that they will widen the A228 by Colts Hill to take the extra traffic. However they have been talking about this for over 20 years and nothing has happened. Exactly like the A21 – which took over 30 years to get completed by the government. There is not the money for this project by KCC or by English Highways. So until all these roads have been widened and improved only then can Tunbridge Wells think about putting in more houses.

Question 6

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Roads – as above

Sewage – as above

Flooding – as above

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	Ms Alison Burchell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	NHS Kent and Medway Clinical Commissioning Group
Address	[REDACTED] [REDACTED] Ashford [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	NHS Kent and Medway Clinical Commissioning Group [REDACTED]
Comment ID	PSLP_1554
Response Date	04/06/21 09:16
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	NHS Kent and Medway Clinical Commissioning Group
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Paragraph Number: 5.189

[TWBC: this representation has been input against Policies AL/RTW 8, AL/RTW 15, STR/CRS 1, AL/HA 5, STR/SS 3, PSTR/HO 1, PSTR/BM 1, STR/SS 1, PSTR/GO 1 and AL/HO 3– see Comment Numbers PSLP_1550, PSLP_1551, PSLP_1552, PSLP_1553, PSLP_1556, PSLP_1568 PSLP_1570, PSLP_1554, PSLP_1559 and PSLP_1569]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I can confirm that the CCG has been engaged in the local plan development process in order to assess implications for primary medical care provision. The impacts are set out in the IDP and will be regularly reviewed and updated in line with the CCG's GP Estates Strategy. The following comments are provided on specific policies in relation to general practice provision for completeness.

Paddock Wood and Tudeley

Paddock Wood, including land at east Capel Overview

5.189 The infrastructure required to support an expanded settlement of this scale in the location proposed has been identified. This includes education provision, health facilities, and required drainage and utility services.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel Significant growth around Paddock Wood and east Capel is proposed to deliver approximately 3,490-3,590 houses, as defined on the Policies Map. The development strategy for Paddock Wood and east Capel is to: e. provision of a health centre: there is potential for this to be co-located with the sports and leisure hub;

Comment (covering Paddock Wood and Tudeley):

The above policies recognise the need for additional primary medical care provision and infrastructure. The infrastructure and delivery/timing requirements for this will need to be further developed. Please note the CCG position reflected in the IDP which highlights the need for facilities in both areas of development – both Paddock Wood and Tudeley. Of specific note (as detailed in the IDP) is the CCG's view that the population of Tudeley will flow to practices in the Tonbridge area in order to register with

a GP, however there is not the capacity in these practices to accommodate this growth. Whilst more detailed planning is required it is considered that a medical centre facility should be provided for within Tudeley Village.

Question 7

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Future Notifications

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No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	Joanna Nightingale [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Whetsted [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Joanna Nightingale [REDACTED]
Comment ID	PSLP_1046
Response Date	03/06/21 11:19
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.5
Question 1	
Respondent's Name and/or Organisation	Joanna Nightingale
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I live in Whetsted with my husband and two children and have done so for 14 years. We moved here from a town because we wanted to live in a country village. If I had wanted to live in a community like Kings Hill I would have moved there. I work in London and commute by train and there is no way that the Southeastern network will be able to cope with any extra passengers let alone thousands. The roads around here can't cope with the traffic we already have. It can take 10 mins or 30 mins just to get into Tonbridge and there us no rhyme or reason to the congestion just SWOT.

I am writing to object to "The Strategy for Paddock Wood including east Capel" (Policy STR SS 1)

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary in to Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows).

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

In addition to this the quarry in Whetsted Road is being re-opened anyway with plans (which I have objected to also) to expand massively. Whetsted Road can't cope with the amount of HGV's going in and out of Scripps as it is. This traffic has increased hugely sine we moved in 2007. It is damaging the road and our houses with these HGVs rumbling along 7 days a week. It can't cope with any more traffic.

Stop the plans please. They are insane.

Joanna Nightingale

xxxx

Whetsted Road
Whetsted
Kent
TN12 xxx [TWBC: full postal address redacted]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Dr John Nimmo [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel, Tonbridge Capel [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dr John Nimmo [REDACTED]
Comment ID	PSLP_845
Response Date	01/06/21 15:03
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	John A Nimmo
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at East Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Capel for 26 years, having brought up young children to adulthood with education in the local area. I worked during my entire residence here, until retirement over 2 years ago. I have many local connections, including a local music ensemble and local cricket club. I enjoy working as a local activist in key issues.

During my years commuting to outer London via the A21, the traffic congestion has become very much worse. The journey time to access the A21 doubled in duration. Serious local flooding has occurred regularly while we have lived here and has had an enormous impact on the local community. Many households and businesses have been damaged due to repeated local flooding, with many householders having to find alternative accommodation and several businesses closing permanently. In some cases, insurance companies have not paid out.

I strongly object to the Borough Council's draft local plan to build housing developments at Tudeley Village (Policy STR/SS3) and at Paddock Wood including land at East Capel (Policy STR/SS1) because the proposed development is overwhelmingly inappropriate for such a rural location and there are strong specific arguments against the proposals, as follows...

1. Climate change - This is the greatest emergency ever to face the planet. It will impact all life, which is interdependent. Building 4,800 houses in the local area will generate an estimated 17,000 metric tonnes of carbon dioxide, due solely to producing the concrete for the foundations alone. This does not take into account the cement used for internal structures such as flooring, shingles, roadways, pavements and parking spaces. This scale of construction will increase the borough's claimed 3,4743 tonnes of carbon dioxide emissions in 2018/19 to over 20,000 of carbon dioxide, which includes the existing emissions. Given the climate emergency, and it is now an emergency, the Borough Council must live up to its commitment on climate change and alter its housing development strategy to further reduce the borough's emissions. Existing, vacant buildings in the centre of Tunbridge Wells could and should be regenerated and converted to housing. These brownfield sites have mistakenly not been prioritised, but this would be an ambitious strategy and it will have a much lower carbon burden on the borough. In addition, the immediate loss of trees and green vegetation due to the scale of building will add even further to the climate emergency by reducing the capacity of the local biosphere to act as a carbon sink. Planting new trees will not be enough to compensate; it will take 30 years to achieve any redress due to the vast loss of green vegetation in the local countryside.

2. Land subsidence - The British Geological Survey has recently published new data that shows that Kent is one of the key areas that will be affected by ground shrinkage due to climate change. The hotter and drier summers being driven by global heating mean that the ground under houses will shrink and crack, resulting in increased instances of property subsidence. Kent has extensive underlying clay formations which make it one of the four most vulnerable areas to loss of moisture. About a million homes were at risk in 1990 and this rises to 2.4m in 2030 and 4m in 2070. (<https://www.bgs.ac.uk/datasets/geoclimate-ukcp09-and-ukcp18/>). With increasing climate change

and repeated flooding and the potential for subsidence, this area is clearly not suited for housing development on this scale. Subsidence can lead to increased insurance premiums, depressed house prices and in some cases, require engineering work to stabilise land or property and the replacement of utility pipe-works. In 2019, the UK's official advisers, the Climate Change Committee, said it was shocked at the lack of proper plans for protecting people from heatwaves, flash flooding and other impacts of the climate crisis. Alternative sites should be sought with a lower shrink-swell risk rating.

3. Flooding/water supply - The local area has suffered many instances of flooding over a long period. The proposed new town is in close proximity to the natural flood plain of the River Medway and there is a risk that flooding could well impact Yalding, which already suffers regularly in times of heavy rain. The whole of the South East region is prone to lack of water; the reservoir at Bewl Water frequently suffers low levels in summer. Clarification is needed that proper professional research has been done to secure an adequate water supply for the region if the extra demand from the new town and 4,800 extra homes comes on stream.

4. Pollution - The proposed development will undoubtedly result in increased levels of many classes of pollutants. These include traffic-related tailpipe emissions, road dust, dust from tyre and brake wear, and noise pollution. In addition, light pollution and water runoff from concreted areas are also known hazards. All of these are known to cause serious damage to human health and to the ecosystem. The development itself, with new roads and increased traffic volumes will increase the levels of these pollutants. There is no level of air pollutants which can be safely breathed. It is hard to understand how the increased levels of any of these pollutants can be truly mitigated by Tunbridge Wells Borough Council's local plans, because no details as to how the Council will reduce any of these pollutants (as is their stated goal) are provided. Limits on pollutants will only become more stringent due to ongoing research. A landmark legal ruling in December 2020 by a London Coroner concluded that air pollution contributed to the death of 9-year-old Ella Kissi-Debrah. Following this ruling, it is only a matter of time before litigation and/or class action lawsuits against local authorities ensues. This will be driven by tighter levels on limits of pollutants, and fuelled by growing public awareness of the impact of pollution on public health, due to the failure of local authorities to adequately measure and adhere to legal limits on tailpipe-emitted pollutants.

5. Protection of green belt land - Certain areas of countryside are designated as green belt in order to protect it. With the current climate emergency and Covid-19 pandemic, there is increasing awareness of the importance of green spaces to the mental wellbeing of the population. Green belt land must be preserved. If not protected, zealous development will result in the permanent destruction of the green belt and further depletion of the associated carbon sink. This carbon sink is crucial for protecting the environment against carbon overload by converting carbon dioxide to oxygen. Even part of the AONB will be destroyed by the draft local plan. The local community values and cherishes its green belt land.

6. Affordable housing - A major benefit claimed by many councillors for the proposed development is the provision of affordable homes for local young people. The proposed development will not deliver such low cost housing, given that 3-, 4- and 5-bedroom houses form a significant part of the scheme. With closer proximity to Tonbridge rather than Tunbridge Wells, we can expect overspill from London and large towns to add greatly to the local population. Incomers will be attracted here to live in new housing, rather than young local people, resulting in a new commuter belt adjacent to the A21 and Tonbridge rail station with fast links to London. The development will add heavily to the congestion on the already busy local roads and highways, especially close to Tonbridge. Overall, the proposed development is overwhelmingly inappropriate for a such a rural location. A much more appropriate alternative site is available, situated at Castle Hill. This is closer to Tunbridge Wells town and is adjacent to much more appropriate and existing infrastructure, i.e. the A21.

7. Lack of engagement - The engagement of the Borough Council with the local community regarding these proposals has been completely inadequate. The Borough Council appears still to be withholding some critical documentation. It has therefore not been possible for many to understand the full scope and impact of the draft plan, and also to understand how to raise objections. In addition, many residents in the local community do not have access to the internet and so many of the public cannot be easily appraised of all the intricacies and workings of the process in order to understand and comment on the proposals. The Borough Council has not done nearly enough to compensate for this. Due to the Covid-19 pandemic restrictions, public meetings and protests have not been allowed. All this has conspired to put the Borough Council in a very advantageous and, frankly, unfair position to pursue the development, compared to the local community. Importantly, it must be stressed that many borough

councillors admitted publicly to being unable to access the necessary briefing documents before voting for the proposals. How can this be a fair and proper process!

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Given the arguments I raised in Question 5, the following modifications to the plan would be necessary make it sound...

1. Climate change - Given the climate emergency, and it **is** now an emergency, the Borough Council must live up to its commitment on climate change and alter its housing development strategy to further reduce the borough's emissions. Existing, vacant buildings in the centre of Tunbridge Wells could and should be regenerated and converted to housing. These brownfield sites have mistakenly not been prioritised, but this would be an ambitious strategy and it will have a much lower carbon burden on the borough.

2. Land subsidence - The British Geological Survey has recently published new data that shows that Kent is one of the key areas that will be affected by ground shrinkage due to climate change. The hotter and drier summers being driven by global heating mean that the ground under houses will shrink and crack, resulting in increased instances of property subsidence. Kent has extensive underlying clay formations which make it one of the four most vulnerable areas to loss of moisture. Alternative sites should be sought, in line with the British Geological Survey data, to identify more suitable locations with a lower shrink-swell rating and reduced risk of subsidence.

3. Flooding/water supply - Proper flood risk assessment needs to be carried out because of the persistent and costly flooding in the local area. Clarification is also needed that proper professional research has been done to secure an adequate water supply for the region if the extra demand from the new town and 4,800 extra homes comes on stream.

4. Pollution - The proposed development will undoubtedly result in increased levels of many classes of pollutants. These include traffic-related tailpipe emissions, road dust, dust from tyre and brake wear, and noise pollution. In addition, light pollution and water runoff from concreted areas are also known hazards. All of these are known to cause serious damage to human health and to the ecosystem. By regenerating vacant properties in the town centre, there will be less pollution all-round (tail-pipe emissions, brake, tyre and road dust) as public transport becomes the main mode of mass transit. Light pollution due to new developments would not occur in green belts areas. The risk of litigation and/or class action lawsuits against local authorities would be lessened if cognisance of that risk is realised and avoidance action taken.

5. Protection of Green Belt Land - Green belt land is supposed to be protected. There is increasing awareness of the importance of green spaces to the mental wellbeing of the population. Green belt land must be preserved in order to support human wellbeing and this can be achieved by building in alternative and more appropriate existing brownfield sites.

6. Affordable housing - A major benefit claimed by many councillors for the proposed development is the provision of affordable homes for local young people. The proposed development will not deliver such low cost housing, given that 3-, 4- and 5-bedroom houses form a significant part of the scheme. More affordable locations for young people should be considered with multiple occupancy properties created in the town centre from existing brownfield sites.

7. Lack of engagement - The engagement of the Borough Council with the local community regarding these proposals has been completely inadequate. Many issues, such as the Covid-19 pandemic impact on public gatherings, and the complexity of the process for lodging objections have conspired to put the Borough Council in a very advantageous and, frankly, unfair position to pursue the development, compared to the local community. Importantly, it must be stressed that many borough councillors admitted publicly to being unable to access the necessary briefing documents before voting for the proposals. How can this be a fair and proper process!

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Margaret Nimmo [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Margaret Nimmo [REDACTED]
Comment ID	PSLP_886
Response Date	02/06/21 10:35
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Margaret Nimmo
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR SS1 for Paddock Wood including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Capel Parish for 26 years with my husband and our two children, who were raised here and attended local schools. As a family, we participated in many activities around the village, including walking, cycling and sports. I enjoy retirement in the village, and I am an active member of Capel Cricket Club Ladies' Team.

I strongly object to both Policies STR/SS 1 Strategy for Paddock Wood including land at east Capel and STR/SS 3 Strategy for Tudeley Village. There are several key points which I would like to address in relation to this objection...

Green belt - 4,800 houses will be built on land which is currently designated as Green Belt, supposedly protected. The plan will require the Green Belt to be downgraded and destroyed in order to construct this development. In view of the recent Covid-19 pandemic and increasing awareness of the benefit of green spaces towards mental health needs, local communities require green spaces to support mental health and promote community wellbeing.

Local roads and transport - Existing local public transport is poor, with only a limited service due to infrequent buses. Due to the level of housing in the proposed development, an increased number of vehicles will use the local roads, adding to the existing congestion at peak times. This added congestion will be exacerbated by the new secondary school planned. The resulting poor traffic flow is very likely to have a negative impact on local businesses.

A new road is proposed between Five Oak Green and Capel, the so-called "Five Oak Green by-pass". This would also be entirely on Green Belt land, resulting in yet more destruction of the natural environment. If such a road is constructed, it will partition the Parish communities of Capel, Five Oak Green and Colts Hill. This will result in a separation of the three communities, thereby acting as a barrier to our community life. The villagers will be unable to walk to the only shop in the village, the local primary school and the village Community Hall.

This road will impinge onto Sychem Lane, and will likely require the compulsory purchase of working farmland used for grazing cattle, sheep and growing crops. If this land is taken, this will mean that the farmers using this land will lose their livelihoods as a result.

Hospital capacity / medical care - A new town with the proposed number of new homes in Capel will put much more pressure on the services at the Kent & Sussex hospital at Pembury. Adequate medical centres, fully and professionally staffed, will be necessary to support the greatly increased size of the local community. It is critical that the capacity of the hospital and medical centres are enabled to cope. Extra funding will be necessary for this, in order to cope with the increased local population, and it is not clear whether the funding will be made available in time. This needs to be in place first.

Flooding / water supply - Parts of Capel parish have long suffered from flooding. The proposed new town is in close proximity to the natural flood plain of the Medway. Runoff downstream is a further likely consequence. There is a risk that flooding could well impact both the existing and new development.

The whole of the South East is prone to water shortage; the reservoir at Bewl Water frequently suffers low levels in summer. There is likely to be serious pressure on demand at critical periods of low rainfall in the year, when the extra demand from the new villages and 4,800 extra homes comes on stream.

Natural environment - the destruction of the green belt land will adversely impact the natural environment and wildlife in the area. Loss of habitat and a reduction in the number of species will be unacceptable.

Air quality, light and noise pollution / mental health and wellbeing - the extra housing, cars, street lighting, water runoff and all that goes with a new development will lead to increased levels of pollutants in the air, resulting in poorer air quality. The carbon footprint will unquestionably increase, and this will be a contributor to climate change. In addition, noise and light pollution will increase in what is currently a rural, Green Belt area. The quality of the environment in Capel will be irreparably damaged and changed for the worse, and forever, despite the growing awareness of the importance of green spaces to human health and wellbeing. It is hard to imagine that this is consistent with a desire for betterment of the parish, and it certainly will irreparably damage our existing local way of life.

Architectural heritage - the historic church at Tudeley is located beside where the proposed new housing development will be sited. All Saints' Church at Tudeley has windows designed and created by Marc Chagall, the world-renowned artist. Tudeley is internationally famous as the only church in the world having stained glass windows designed by Chagall, within its setting in the green fields of Kent. This precious architectural heritage will deteriorate when the surrounding fields are destroyed and the church is surrounded on three sides by the new town at Tudeley. This is just one example of the planned environmental vandalism.

Housing density - the amount of housing planned for Tudeley and East Capel is disproportionately located, with more than 50% of all new housing in the Borough of Tunbridge Wells being within Capel Parish. This means that the construction will negatively impact more upon the nearby Borough of Tonbridge and Malling, yet the income from the extra council tax will benefit Tunbridge Wells.

The houses planned include 3, 4, and 5 bedrooms. This will not be affordable housing which is what is required in the local area.

In conclusion - I contest that this draft Local Plan and the concept of the new town to be built on Green Belt land in Capel parish has been poorly thought out and rushed through. There has been little to no communication and consultation with the local community. It is an expedient answer towards meeting government-imposed targets, rather than being a solution which addresses true local needs. Further, there can be no justification for the destruction of Green Belt land and for ignoring the long-established legal precedents to protect the Green Belt.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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This development is in the wrong place and has been rushed through with little consultation with local people and our needs. We have not been able to congregate during the Covid-19 pandemic to discuss together with our local community. There are alternative brownfield sites in the borough which have not been properly prioritised. Vacant offices and shops in Tunbridge Wells could be regenerated into homes which would help reduce the carbon footprint and help rejuvenate the town.

In addition, the Castle Hill site alongside the A21, which would be more suitable as the infrastructure is already in place, has been completely dismissed out of hand by TWBC with no sound justification.

Also, the proposal amounts to a disproportionate number of houses (over 50% of all new housing) in Capel parish compared with the other 19 wards in the TW borough. Tonbridge, the nearest town to a large part of the proposed development, will be greatly and negatively impacted by the vast increase in housing, while there will be minimal impact on the rest of TW borough. In addition, TWBC will benefit greatly from the increased revenue from council tax, but Tonbridge and Malling will not.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Siobhan O'Connell ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tunbridge Wells TN2 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Siobhan O'Connell ([REDACTED])
Comment ID	PSLP_1329
Response Date	04/06/21 15:43
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Siobhan O'Connell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The amount of housing allocated to Paddock Wood is completely disproportionate and will completely overwhelm the local roads and infrastructure. The area is also prone to surface water flooding and further building is likely to significantly exacerbate this, despite promised flood mitigation measures. Valuable agricultural land will be lost, as well as countryside for residents to enjoy. Insufficient attention was paid to Reg 18 comments and there are a lack of earlier engagement and consultation with the local community. Many residents did not become aware of plans until far too late in the process. The plan does not sufficiently address local housing need nor have adequate proposals for traffic or other transport infrastructure.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Joanna Osborne [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Joanna Osborne [REDACTED]
Comment ID	PSLP_1232
Response Date	04/06/21 11:13
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Joanna Osborne
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

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Do you consider that the Local Plan is not sound because:

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- . It is not justified
- . It is not consistent with national policy

Question 5

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Response to Question 5

We have been resident in Five Oak Green for 30 years, married in Tudeley Church and raised our son in the village, who attended local schools and was a member of the local Scout Group, which we both assisted with as adults.

We know from current experience that traffic on the B2017 is disrupted outside Capel School at the start and close of the school day, and that it is not uncommon for the early morning traffic jam from the Somerhill Roundabout and adjacent school can back up to The Turmeric Gold Indian restaurant, a distance of approximately 1.5 miles.

Five Oak Green and the surrounding area has flooded several times in the last decade, and our house being only 50 yards from the Alders stream, was lucky to avoid it. Flooding in the village is only now avoided by swift action by the Environment Agency who monitor and clear debris as necessary where the Alders Stream passes under the B2017 in the village. Our neighbours at Brook Cottage were flooded last year by the sewer that passes through their and our properties. During heavy rain the sewer often needs days of tankers pumping out a holding tank adjacent the B2017 at the Alders stream crossing point.

Although there is a lack of "affordable" housing within the parish, recent local developments – Foalhurst Woods for example, do nothing to address the problem – all any Developer will do is to provide the minimum required by law, and their definition of what is "affordable" leaves much to be desired, leaving most young people unlikely to ever afford to buy a house.

If the proposed developments at Tudeley and/or East Capel were to take place, these issues of traffic congestion, lack of infrastructure and potential flooding would only be exacerbated. Post Covid, there is now a greater emphasis on wellbeing, and the benefits of getting into the countryside, exercising and experiencing its nature and tranquillity. The peaceful rural landscape amenity that is currently available for everyone to enjoy would be destroyed by these developments which would effectively join Tonbridge, Capel and Paddock Wood as one sprawling entity.

We understand that Tunbridge Wells Borough Council (TWBC) have been set totally unrealistic requirements for new housing, by ill-advised Government targets, but they have conspired by choosing Tudeley as the location for this highly inappropriate development to place it right on their boundary with Tonbridge & Malling Borough Council (TMBC), who would have to bear the brunt of the vast majority of the increased traffic for both commuters, schools and the increased burden on local resources and infrastructure, Doctors, School places etc. We have not seen any evidence of a thorough consultation with TMBC or that its plans for increasing resources and infrastructure are commensurate.

The concern is broader than just the response of TWBC to the new housing demand, there is an issue with the demand itself. A borough with such a high proportion of land in AONB, heritage towns (RTW

itself) and green belt should have its target adjusted to take the quality of its land into account. TWBC should query this rather than slavishly accepting the unrealistic targets it has been set.

The loss of Greenbelt, its affect on the nearby AONB's and the loss of productive farmland would be unforgivable. Given the current fight to reduce global warming, and the need for more of the UK's food requirements to be home grown, thereby reducing our "food miles", paving over these areas should not even be considered.

Although undoubtedly the new developments would incorporate all the latest sustainable drainage systems (which are fine until they inevitably silt up), and the new housing would be protected from flooding by raising ground floor levels etc, they are being built on large areas of floodplain. The concern is the effect on all the existing properties in the area, which have seen flooding in the past, of paving over all these acres of land thereby reducing the ability of the land to absorb rain.

TWBC do not seem to have actively pursued other sites within the Borough, as the proposed scheme at Tudeley ticks all their boxes and the land has been offered to them on a plate by the landowner – Hadlow Estates, who unfortunately have a long history locally of selling off land/ properties in their ownership to the detriment of the local community, for financial gain.

As a consequence of these proposed developments it would appear that Five Oak Green needs a bypass. WHY? Given that most traffic from the Tudeley development would head into Tonbridge for the station, shopping, schools etc and that from East Capel would head into Paddock Wood for the same services, we would question the need for this. We believe the traffic analysis has been based on faulty assumptions about the direction in which the traffic will flow from each of the developments. Furthermore, post Covid travel patterns have changed so the traffic forecasts need a fundamental reassessment.

Siting a roundabout right next to Capel School on the B2017, which already has traffic problems seems to be dangerous for school children, not to mention the health effects on them from increased fumes. The route of the bypass would cut off Sychem Lane to vehicular traffic. The bypass route then cuts the last remaining commercial hop garden in the village in two. This hop garden has been expanded in recent years due to increased demand, and two local breweries use the hops from this field. When we arrived here 30 years ago the village was surrounded by hop gardens, now there is one left (for how long?). This not only represents local heritage, but heritage for Kent as a whole. High quality farmland is being lost.

This bypass then joins the proposed Colts Hill bypass (A228) at a roundabout. We thought that the whole point of the Colts Hill bypass was to improve traffic flow along the busy route that links Maidstone and Tunbridge Wells, and for the many emergency vehicles that use it daily accessing the hospital at Pembury. We do not see how traffic flow will be eased by having 3 roundabouts in half a mile (the existing one at the junction of the A228 and the B2017, the one at the end of the proposed Five Oak Green bypass and yet another proposed where Alders Road meets the Colts Hill bypass)

Alders Road carries a lot of traffic at peak times, and still will, Five Oak Green bypass or not. People currently use it to avoid the long queues of parked cars outside Capel School at morning drop off and afternoon collection, and delays in Five Oak Green due to on street parking, & bus routes/ stops. The proposed development and bypass would only serve to increase the traffic on this country road further.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_78a-c

Comment

Agent	Mr Troy Hayes [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Troy Planning & Design
Address	[REDACTED] [REDACTED] London [REDACTED]
Consultee	Mrs Nichola Reay [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Paddock Wood Town Council
Address	The Podmore Building St Andrews Recreation Ground TONBRIDGE TN12 6HT
Event Name	Pre-Submission Local Plan
Comment by	Paddock Wood Town Council [REDACTED] [REDACTED]
Comment ID	PSLP_1452
Response Date	04/06/21 16:11
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-1 Cover Letter Redacted.pdf PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-2 Representation.pdf PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-3 PW TC Response to Reg. 18.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paddock Wood Town Council

Question 2

Agent's Name and Organisation (if applicable) Troy Planning & Design

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: for other comments by Paddock Wood Town Council, please see Comment Numbers PSLP_1448-1456, PSLP_1461, PSLP_1471, PSLP_1474, PSLP_1475-1477 and PSLP_1479]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Tunbridge Wells Pre-Submission Local Plan – Paddock Wood Town Council Representation

Please find enclosed our representations to the Council's Pre-Submission Local Plan. These Representations are prepared and submitted on behalf of Paddock Wood Town Council (PWTC) and the representations are supported by the Paddock Wood Neighbourhood Plan Steering Group.

We also enclose the Council's Representation Form with our signature confirming that we do wish to take part in the Local Plan Examination Hearings.

We would like to point out that the majority of PWTC's representations to the Regulation 18 consultation were not addressed by TWBC. Given that the Local Plan has changed very little between that earlier consultation and the current period of representations on the Regulation 19 Local Plan we enclose these earlier representations and request that TWBC takes these into account and ensures they are supplied to the Secretary of State if the Council decides to proceed to submission stage.

We request that you please include this letter as part of our formal representations.

Our representations conclude that the Local Plan and its evidence base fail all the tests of soundness set out in the National Planning Policy Framework (NPPF) and that the Local Plan is not legally compliant.

Our representations go to the heart of the soundness and legality of the Local Plan, its policies, and the process TWBC has undertaken in preparing its Local Plan. We therefore consider that the entirety of the Local Plan is unsound as it is not legally compliant. Whilst we have singled out a number of specific policies that we consider to be unsound it would simply not be possible to comment on every single policy in the Local Plan which is a 515-page document.

We trust that TWBC appreciates the importance of the Local Plan proposals to the Paddock Wood community in terms of the inappropriateness of the proposals which would, if the Local Plan in its current form were to be implemented, have irreversible negative impacts on Paddock Wood and the wider area.

We urge TWBC to reconsider its development strategy which is set to fail at Local Plan Examination in Public and to restart the Local Plan process using an evidence base led approach which would conclude that Paddock Wood is an unsuitable and unsustainable location for strategic housing growth. Such an approach would save TWBC, the taxpayers and all the stakeholders involved in the Local Plan process an enormous amount of time and resources debating a Local Plan which is clearly unsound and not legally compliant.

1 Growth Proposed at Paddock Wood (including Masterplan Issues)

Overall

14.1. David Lock Associates produced work on the town centre masterplan and it was sent to PWTC Councillors and the Neighbourhood Plan Group however it was sent on a confidential basis and PWTC and the Neighbourhood Plan Group has not been able to share it more widely. We question Why is this not available in the PSDLP particularly given that the masterplan meeting was on the 25th of February 2021.

14.2. We understand that the masterplanning work relies heavily on the burden of paying for infrastructure such as flood mitigation, education, Colts Hill bypass, sports facilities being shared equally over all the development sites by all the developers. It is also assumed that the viability impact of some sites being capable of a high density of development and others having to be low density due to land being required for SuDS,, swales and other built mitigation features will again be equally shared. We question what the mechanism is for achieving this coordination and delivery without external oversight. The phasing and viability of this approach has not practically been testing in the viability evidence which is quite a blunt instrument for testing development viability and does not capture the complexity of the strategic development proposed at Paddock Wood and Tudeley.

Sports Hub

14.3. Through work on the Neighbourhood Plan the Paddock Wood NDP Steering Group has set up a sports sub-group to liaise with sports clubs and associations in Paddock Wood. The group has worked diligently on preparing a strategy for future sports provision in the town and which proposed a new sports hub to the north of the railway line at Eastlands. Such proposals have been made clear to TWBC and their consultants through production of the Strategic Sites Masterplanning document. However, and despite this, that report identifies land for a sports hub to the south west of the Paddock Wood growth area. This is reflected in Policy STR/SS1 of the Local Plan, which has little flexibility in the location of such a use.

14.4. There is no real rationale for the approach taken, with the reasons provided also being good reasons not to locate a sports hub here.

14.5. The Strategic Sites masterplanning presents the preferred growth strategy for Paddock Wood in Option 1. Justification for the Sports hub in the south west corner is as follows:

- . It will maximise accessibility within Paddock Wood by active means. However, the Town Council suggests that its location on the very periphery of the growth area that it will be far removed from many people, both existing and new residents, including major areas of growth to the north of the railway line.
- . The site is in the floodplain and is therefore an appropriate use for that land. However, the Town Council also notes that land it suggests for a sport hub at Eastlands is also in the floodplain (and so there is no difference between either of these locations), but that the masterplanning process instead suggests that housing would be suitable at Eastlands. The Town Council does not agree that housing is an appropriate use within the floodplain.
- . Its location on the south western edge along a revision to the Green Belt boundary would create a soft edge and a buffer between Paddock Wood and Capel. The Town Council suggests that this appears to be the primary reason for the location of the sports hub, rather than wider considerations of accessibility, integration with the built-form and appropriateness of land uses.

14.6. Option 2 of the Strategic Sites masterplanning process presents an alternative option that matches the aspirations the community expressed in consultation on the masterplan, but this was dismissed for the following reasons:

- . It would create excessive north south vehicular traffic, placing pressure on the single road bridge in the town. However, the Town Council points out that with the significant scale of growth proposed to the north of the railway line, people will be travelling north south in any event, and a location either north or south of the town will not change that. Indeed, the only approach that would change that would be to limit any development to the north of the railway line. Indeed, and recognising that major growth is proposed both north and south of the railway line, the masterplan proposes delivery of new rail crossings, and that these would enable access to the northern part of the town. The assumption made by TWBC would appear to be that residents will use active travel means to access a sport hub in the south west periphery of the town, but will use vehicular means to use alternative locations.
- . Concerns that there will be traffic cutting through residential areas from those outside of Paddock Wood travelling to the sports hub. However, the Town Council points out that the preferred location on the edge of the growth area will result in people travelling across Paddock Wood in any event to access the sports hub. The Town Council also points out that sports clubs and organisation in Paddock Wood have indicated that importance of public transport and the role of the train station in bringing people to sports events and activities from outside the town. The preferred location indicated in the masterplanning report is far removed from this, where as a location at Eastlands will support access by sustainable modes of travel.
- . Flooding would cause the pitches to become inundated with water. However, the Town Council points out that one of the reasons for the south west site being the preferred location is that it is also in the floodplain and is considered an appropriate use.
- . Impact of the hub (a large building) on the landscape setting. However, the Town Council points out that the preferred masterplan indicates housing and or a school building in this location and that such development would have the same if not more significant impact than a sports hub.

14.7. Option 3 of the masterplanning work indicates the sports hub being in the same location as option 1. Option 4 proposes instead that existing facilities should be retained and improved, but that this was result in an under-delivery of sports provision. Thus, a new sports hub is required.

14.8. The preferred approach runs the risk of creating a 'lop-sided' town with all facilities to the south and west, irrespective of the significant growth taking place all around Paddock Wood. The Town Council's view is that the aspiration should be to create a fully integrated and cohesive community, with good access to all facilities for people of all ages and abilities. Paddock Wood already benefits from a number of sports facilities, including those at Putlands and the Memorial Field. These are clustered to the south of the town. To help create an integrated and inclusive community it is important to balance provision across town. Indeed, the scale of growth to the north of the railway line will generate a need for sports provision in its own right. Locating a new sports hub at Eastlands will meet these requirements and balance sports provision across town in accessible locations. The Town Council suggests that the only reason offered by TWBC for locating the sports hub in the south west is to act as a landscape buffer between Capel and Paddock Wood. The Town Council contends that this does not constitute good placemaking.

14.9. The Town Council would also like to point out to the Inspector(s) that they are keen to take on the running and management of such a facility, but that locating this in the south west periphery of the growth area would preclude this as the site falls outside the boundary of the Town Council and is

instead located within Capel Parish (whom has confirmed to the Town Council that they do not wish to have the burden of potentially having to manage such a facility).

In summary:

14.10. The preference for a sports hub to be located in the south west periphery of Paddock Wood is not supported. It is not justified by evidence. The Town Council, working with sports clubs and organisations, has identified an alternative location at Eastlands which should be recognised in changes to the Local Plan policy and which would align with work undertaken with the community through the emerging Neighbourhood Plan.

[TWBC: for full representation, please see supporting documents]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Paddock Wood Town Council confirms that it wishes to participate in the Local Plan Examination hearing sessions. Given the scale of strategic development proposed at Paddock Wood and nearby at the proposed new settlement, its extensive representations, and its role as a statutory consultee, PWTC considers it critical that it has the opportunity to provide further input into the Local Plan Examination process including the hearing sessions to respond to other evidence and arguments put forward.

If you would like to attach a file in support of your comments, please upload it here. [PSLP_1448-1479\(not inclusive\)_Troy Planning for PWTC SI-1_Cover Letter_Redacted.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP_1448-1479\(not inclusive\)_Troy Planning for PWTC SI-2_Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP_1448-1479\(not inclusive\)_Troy Planning for PWTC SI-3_PW TC Response to Reg. 18.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ian Pattenden [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Ian Pattenden [REDACTED]
Comment ID	PSLP_417
Response Date	30/05/21 20:15
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Ian & Angela Pattenden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I object to "The Strategy for Paddock Wood including land at East Capel" (Policy STR/SS 1).

The land proposed to be developed is in the Green Belt and should only be built upon if "exceptional circumstances" exist, what are these? Utilising this green belt will effectively create an urban sprawl from Paddock Wood with Five Oak Green, something the greenbelt designation is designed to prevent and with the proposed development in Tudeley will effectively join Paddock Wood with Tonbridge, a huge urban sprawl. The land is on a recognised flood plain, building here, even with flood risk mitigation and "betterment", of which there are no details, could have disastrous consequences. The measures being looked at in theoretical terms are apparently based on old out of date data that does not fully consider the up to date information and the additional impact of climate change.

There are many important listed heritage assets such as Badsell Manor for one example, which should be protected along with their setting. The proposed development at East Capel will surround this one important asset along with many typical rural Kentish farmsteads located within the proposed area of development and beyond. No amount of mitigation can replace this important rural landscape.

Being a rural area, East Capel is blessed with a diverse and important list of birds and wildlife, many on the European red list of protected species and some endangered such as Bats, Great Crested Newts, Turtle Doves and field nesting birds such as Skylarks, Linnets and Yellowhammers. This legacy cannot be just brushed aside by statements that they will be relocated to somewhere else, this is wishful thinking and a complete fantasy. The birds and wildlife will just decline in numbers and finally disappear into extinction. Hedgerows will disappear leaving a barren and lifeless "man made" landscape devoid of wildlife, is this something planners will be proud to leave as a legacy for the future? Putting bird and bat boxes on houses, leaving some green spaces and other fanciful "conservation measures" in place, is only paying lip service to biodiversity net gain. Moreover the cumulative effect of this proposal, the proposed development at Tudeley and the gravel extraction plans at Stonecastle and Moat Farms will have a devastating overall destruction of a rural parish, effectively changing it into an ugly urban landscape.

The Leader of the Council, in his forward to the PSLP, states " the Council feels that it has got the overall balance right".....????? What sort of scales are they using when they propose to dump more than 50% of the apparent housing need in Capel parish which currently comprises 2% of the borough population, please explain the logic.

In summary, this proposed part of the Pre-Submission Local Plan has been ill thought through, in indecent haste without any regard to the needs or comments of the community of Capel. There are other alternatives that should have been given the same due consideration, but the so called responsible

Officers of the Council hastily “nodded through” this unacceptable plan. The process of community engagement and consultation, Reg18, resulted in an unprecedented number of responses which have been totally ignored in this latest iteration of the Local Plan. No exhibitions or public consultations have taken place due to the Covid pandemic, only online “tick box” information cards masquerading as the “public consultation” process. Furthermore, council elections took place in the middle of this whole Reg19 process and as a result the composition of the Council has radically changed mid way, how can this be democratic? Lastly, the whole formal process of responding to the Reg19 consultation has been made extremely difficult, particularly to many elderly people within our parish without access to the Internet. How can this be a fair process for this

life changing proposal.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Michael Perry [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Michael Perry [REDACTED]
Comment ID	PSLP_140
Response Date	16/05/21 09:14
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Michael Perry
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The area plan for Tunbridge Wells Borough has been prepared on the basis that most of the future housing requirement will be located in Paddock Wood and Capel parishes, rather than being spread across the whole borough. The result is an uneven proposal that will lead to very major issues in the Paddock Wood and Capel areas.

Particular issues that will arise as a result of this centralised approach are:

. **Loss of Green Belt.**

The Metropolitan Green Belt was established as a policy to control urban growth with the fundamental aim of preventing urban sprawl. A very high percentage of the proposed development in Paddock Wood and East Capel requires the sacrifice of green belt land. This goes against the very principals of the creation of green belt. No development should be taking place on green belt land. The proposal fails four of the five stated purposes of green belt:

- i It does not check the sprawl of large built up areas, exactly the opposite.
- ii It does not prevent the merging of Paddock Wood with Five Oak Green. The two centres would abut each other as a result of this plan.
- iii The policy would mean that the countryside is encroached by development.
- iv It does not assist urban regeneration as it does not encourage the recycling of derelict and other urban land.

. **Flood Plain**

Despite the 'green' areas contained in the plan, the whole of the proposed development is on flood plain. It will be impossible to entirely mitigate against the impact of this loss on either existing or new properties. At the moment the area is prone to flooding on a regular basis and further development will make this considerably worse.

. **Infrastructure**

During the consultation we have been advised by the planning officer that it will not be possible to deal with infrastructure issues prior to the development taking place, as the costs of this are reliant on s106 monies. The planning officer has also used the words 'life will be hell in Paddock Wood for fifteen years, but that can't be helped.' If the necessary developments were spread across the Tunbridge Wells Borough, with lots of smaller projects, whilst difficult, it seems feasible for much of the necessary infrastructure to be added after development. With the proposals for Paddock Wood the town will

grind to a halt without infrastructure issues being dealt with prior to development. The burden of the proposed massive expansion of houses on roads, health and education would be disastrous. At the moment the level of additional development that has taken place recently, is already creating serious infrastructure issues that have not been addressed.

The Council have not put in sufficient thought into the issues that will occur if infrastructure is not dealt with in advance of development. The plan should be changed either to one where the housing is spread across the whole borough or alternatively the council commits to funding very major infrastructure improvements well before development starts, taking on board the possibility that they may not be able to recover these monies.

Consultation

Whilst the Borough Council has gone through the normal consultation, most recently through the section 18 process, they have taken no notice of the very high number of comments and objection to the plan, as it impacts Paddock Wood and Capel. It appears that the council never had any intention of altering their plans, in the light of public feedback, as the response was so overwhelming and has not led to changes. The council have followed the formal procedures that are required to consult on a local plan, without entering into the spirit of the process.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- . The plan should be re-drawn removing all development in green belt land and alternatively spreading development across the borough, with greater emphasis on brown field sites.
- . Development should not be allowed on the flood plain.
- . If the plan goes forward in substantially the current format, then the council should be compelled to put in place the necessary infrastructure prior to development commencing.
- . The plan should be amended to take account of the very high level of public comments and suggestions.

Question 7

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No, I do not wish to participate in examination hearing session(s)

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Michael Perry [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Michael Perry [REDACTED]
Comment ID	PSLP_141
Response Date	16/05/21 09:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Michael Perry
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I am the owner of Badsell Manor, located in the area covered by the policy. Badsell Manor is the property identified in the plan as a site of historic interest to be protected.

Badsell Manor is a medieval moated manor house whose origins go back almost 900 years and is the most important historic building lying within the scope of this policy. A listed building, the property has had a colourful history having been the home to eminent historic owners. A full history of the property is documented on the website www.badsellmanor.co.uk.

In preparing the plan the Borough Council do not appear to have taken into full account Historic England's guidance contained in 'The Historic Environment and Site Allocations in Local Plans' under Historic England Advice Note 3.

Under s72 Planning (Listed Buildings and Conservation Areas) Act 1990, the local plan should set out a positive strategy for the conservation and enjoyment of the historic environment, in which the desirability of sustaining and enhancing the significance of heritage assets should be considered (NPPF paragraph 126). The plan does not properly protect Badsell Manor and its important moated curtilage.

Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal, taking into account an assessment of its significance (NPPF paragraph 129.) I do not believe that the Borough Council have properly assessed the importance of this site and have certainly not visited the site to help evaluate its importance. Under NPPF paragraph 132 consideration should have been given to the importance of this site.

Any proposals that result in harm to heritage assets need to be fully justified and evidenced to ensure that they are appropriate, including mitigation or compensation measures. This patently has not been done with development being proposed within the very area (which I consider has been wrongly calculated) which the Council themselves have designated as a site of historic interest to be protected.

The inadequate assessment of the historic site, on which Badsell Manor is situated has led to the council simplistically applying an area of historic importance of 300 metres centred on the Badsell Manor building. This is a negligent approach that takes no account of the setting, where the Southerly aspect is less important to protect due to other listed buildings and the road B2017 but the Northerly

aspect has great importance. Of particular relevance is the working moat which runs to within 50 metres of the curtilage. The plan simply provides for a very thin strip of woodland beyond this, with a cycle path running immediately beyond this. This does not comply with the advice from Historic England which states that 'Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases.'

The property has historically enjoyed a rural setting, surrounded by open fields. The area plan would permanently destroy this setting. The plan has identified the importance of this site and nominally has provided a three hundred metre circle surrounding the house, as a site of historic interest to be protected. The plan does not however properly protect the property. Changes could be made, having little impact on the development provisions of the plan, whilst helping to mitigate the impact on this historic site. Particular attention should be paid to:

- . The area highlighted as being a 'site of historic importance to be protected' should not be a simple 300 metre radius from the Badsell Manor as a building and should take into account the curtilage of the site. Of particular historic interest is the unusual working moat that lies principally to the North of Badsell Manor; centring the protective area on just the house ignores the importance of this feature. It is of the greatest importance to protect the North of the site, where the area highlighted in the plan is only 50 metres from the curtilage of the property and 75 metres from the moat.
- . The South West corner of the sports hub significantly ingresses on the site of historic importance. This clearly fails to protect this historic site and demonstrates that the Council have not researched and taken proper account of the site.
- . The most southerly pedestrian / cycle route passes within 50 metres of the curtilage of the site of Badsell Manor. This should be moved to the North.
- . Within the circle identified as being of historic importance there is residential development clipping inside the historic site. This makes a mockery of attempting to protect this important listed building.
- . The green landscape corridor lying to the North of Badsell Manor would better serve to protect the historic site as well as being positive environmentally, if it was to be designated as woodland to be planted.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- . The site of historic importance should be extended so that it extends to 300 metres North of the curtilage of the site, not just 300 metres from the centre of the manor house.
- . The site of historic importance should be respected by changing the proposed sports hub area so that it does not encroach on this area. The planting of mixed woodland would go some way to protect the historic site as well as being environmentally positive.
- . The site of historic importance should be respected by changing the proposed residential building inside this area (lying to the North East of Badsell Manor) so that it does not encroach on this area. The planting of mixed woodland would go some way to protect the historic site as well as being environmentally positive.

- . The green landscape corridor to the North of Badsell Manor should be planted with mixed woodland to help protect Badsell Manor and for positive environmental reasons including flood plain management.
- . The proposed pedestrian / cycle route lying to the North of Badsell Manor, should be moved 250 metres to the North to protect the site of historic importance.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Adrian Pitts [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Adrian Pitts [REDACTED]
Comment ID	PSLP_297
Response Date	24/05/21 11:31
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Adrian Pitts
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land east of Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

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Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived with my wife and two (now adult) children in Paddock Wood for 22 or more years, working locally in Tonbridge. I directed the Paddock Wood Choral Society for 10 years and was a Governor at the Paddock Wood Primary School. Over that time the congestion on the route between Paddock Wood and Tonbridge has become increasingly difficult particularly at school start and finish times. In the main shopping area there has been less and less monitoring of traffic and congestion by traffic wardens leading to frequent double parking and congestion. The 'improvements' to cycling and pedestrianisation rushed in 2020 with no consultation with local people was even worse, and had to be suspended due to the road works going on in the town. The already approved developments are expensive and although my daughter has trained to become a teacher locally, she will be unable to afford the housing being built now. Through a genetic condition we all have to wait many days to gain an appointment at the GP (Woodlands) and dentist services. Most serious in some ways is the increase in flooding in recent years - the main sewer for Allington Road is outside our house. For us it is surface flooding but all around us is road and field flooding. Despite the environment agency maps delivered to my door showing the problem, houses are and from the plan will be built on flood plains.

Traffic - the Badsell Road development has already led to months of traffic lights and road works. The local plan will make this worse through evidence submitted being out of date as the new partially constructed development sites would not have been taken account of in any traffic monitoring. The road from Five Oak Green to Tonbridge is already a busy minor road, with Somerhill School causing congestion at one end (Tonbridge) backed up to Tudeley most mornings. The established corridor between Tonbridge, Paddock Wood and Tunbridge Wells (KCC Schools travel) also means this is a vital conduit. TWBC estimates about 20 years of on-going disruption during the lifetime of the plan. The proposals to make the centre a 'low traffic' town through closure of the Maidstone Road bridge would not reduce the number of vehicle trips to the town from that end. The dentist and other businesses are located there, and would create more traffic on Badsell Road and other cut throughs as it does when there is an accident at the Hop Farm roundabout. Sending traffic past the development being completed (where there is already planned traffic management eg queuing lane etc). Bus only access on a limited weight bridge coupled with the plan for Commercial Road would further restrict access to the Railway Car park. I am very concerned that the car parking should be taken away as approved development at Bell's Chip Shop cites them as part of the approval for the flats proposed there. The temporary removal of access and through traffic arrangements were very unpopular with locals. Very few pupils cycle to Mascalls school, as they come by train from a wide area. Overdevelopment will create more traffic not less. Most houses will have 2 cars per house.

Loss of green belt/productive farmland - the plan may emphasise the 'village' and low traffic nature of the ideas behind the building work, but as Government policy has recognised the importance of countryside with established trees and water systems the replacement with thousands of homes will take years to replace and establish, with most infrastructure coming at the end after the homes have been sold.

Flooding - a serious concern as the plan does not seem to take account of development already in progress with consequent destruction of fields, trees and bio-diversity. There needs to be much more

detail on flood mitigation and drainage. Coupled with an ageing and stretch water supply system the plan does not currently provide for futureproof supply and adequate sewerage disposal.

The council have shown little engagement with the public negative response to Reg 18 and the consultation process here is long, legal and jargon-istic. The Facebook discussion opportunities with the planning team do little more than refer you to a detailed part of the plan which is not in plain English and is very dense to unpick. Specific questions are answered very generally. Paddock Wood Town Council has objected to the Plan several times on behalf of residents this also has been ignored at Borough level.

Paddock Wood is already in the throes of development and potential overdevelopment. The quotas proposed increase the population of the town significantly. The plan gives an unfair burden of development in a largely rural area. Together with proposals by the Hop Farm considered by Maidstone Council, the developments between Capel and Tonbridge the existing rural character and attractive lanes for cyclists will be congested and have a negative impact on the environment and climate (carbon emissions). A no idling policy is not a replacement in an AONB setting.

Because of the lack of engagement with locals for Reg 18, Paddock Wood seems to be focus for all the housing requirements for TWBC sacrificing its rural nature and small urban town nature fundamentally. The level of housing, including unwelcome provision for Gypsies and Travellers is disproportionate and unsound as so much is on a flood plain.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Growth strategy 3 - capped housing at 678 with large Paddock Wood Extension.

Should be based on up to date proportionate growth distributed across existing settlements. We believe this plan is disproportionate.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Adrian Pitts [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Adrian Pitts [REDACTED]
Comment ID	PSLP_3
Response Date	04/06/21 15:40
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Adrian Pitts
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am resident in Paddock Wood West Ward. A local teacher. I have been a governor at PW Primary School. During in the 22 years I have lived here I have been concerned by growing traffic congestion between PW and Tonbridge on the schools corridor and PW and Maidstone. My GP surgery wait times have lengthened which means you rarely get a timely appointment. Outside our house we have experienced flooding issues which were supposed to be once in a generation events quite regularly.

I am concerned about increased traffic that is evident from existing and already approved overdevelopment of Paddock Wood. Badsell Road queuing system has not been built for the FoalHurst estate and the crazy proposals for shutting the Railway bridge effectively cuts off half of the town in addition to routing traffic from Laddingford Yalding etc into Badsell Road. I believe the local plan is not currently sound on account of changing national policies of green belt development. It does not take account of the intervening approvals between its development and consideration. The assessed needs for homes had changed significantly since it was developed. Last week councillors from TMBC have objected to proposals revealing an outdated consultation as a duty to cooperate. The plan has not been positively prepared to take sufficient objective account of building approvals without sufficient prior investment in infrastructure - sewage treatment and water supply concerns.

Traffic evidence cited seems to be without taking in to account current and already approved building work in PW. The small road from PW via Five Oak Green to Tonbridge carries school traffic almost always clogged at the Somerhill end. With a plan envisaging another school and no infrastructure the thoroughfare will be confested still further.

Affordable housing for the young people in PW has been a cited reason for building approval in the past by TWBC. Rarely are the houses affordable for young people and I believe the current plan will not be effective in delivering this aim. The engagement with the town over our responses to Reg 18 consultation was very poor. The lack of any consultation over rushed pedestrian and cycling measures in the town centre in 2020 that were subsequently withdrawn lead me to suspect this plan also is not sound on community engagement or represents local views accurately. Cycling on Kent's lanes is a popular pastime. Most students attending Mascalls secondary school are local or come by train. Car parking in the town and at the station serves a wide community beyond PW. More traffic wardens would be a more cost effective solution to much of the issues in the town centre. Putting retirement homes where shops had been is not an effective way to regenerate the town.

long term flooding in PW is not effectively addressed by the plan which is clearly already being build on Environment Agency flood plains. - attenuation pools and neutral impact over time will put incredible stress on the systems which are overdue renewal and replacement.

lastly the environment and climate change has become a government priority this plan is therefore not now consistent with the government policy

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_154a-b

Comment

Agent	Miss Judith Ashton ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Judith Ashton Associates
Address	Maytham Farmhouse Maytham Road Cranbrook TN17 4QA
Consultee	[REDACTED]
Company / Organisation	Redrow Homes Ltd and Persimmon Homes South East
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Redrow Homes Ltd and Persimmon Homes South East (- [REDACTED])
Comment ID	PSLP_2167
Response Date	04/06/21 09:43
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_2159-2198_Judith Ashton Ass for Redrow Homes (1) PSLP_2159-2198_Judith Ashton Ass for Redrow Homes
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Redrow Homes Ltd & Persimmon Homes South East
Question 2	

Agent's Name and Organisation (if applicable) Judith Ashton Associates

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR 1, STR 4, STR 5, STR/SS 1, STR/PW 1, EN1, EN2, EN3, EN9, EN13, H3, H6 and H9 – see Comment Numbers PSLP_2159, PSLP_2165, PSLP_2166, PSLP_2167, PSLP_2173, PSLP_2179, PSLP_2182, PSLP_2186, PSLP_2189, PSLP_2191, PSLP_2194, PSLP_2197 and PSLP_2198. See Supporting Information for representation in full]

Question 4

Do you consider that the Local Plan:

Is sound No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not effective . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I write with reference to the above. As you will be aware, I act for both Redrow Homes Limited and Persimmon Homes South East who have various interests in Tunbridge Wells, including those east and south east of Paddock Wood (SHLAA sites '20', '374', '371', '344' and '376'), (LPA sites PW 1_7, 1_9, 1_11 and 1_12), (parcels 7, 9, 11 and 12).

Whilst, having regard to the above, Redrow and Persimmon both support the Reg 19 Plan in principle, especially the proposed allocation of the land at Paddock Wood (policies STR/SS1 and STR/PW1), they do have specific concerns about certain aspects of policies STR/SS1 and STR/PW1 and the evidence base underpinning the plan.

In saying this we acknowledge that the Strategic Sites Topic Paper (March 2021) provides a detailed critique of the rationale behind the proposed allocation of the land at Paddock Wood and Capel, with section 8 explaining how the development looks to address the requirements of para 72 of the NPPF; and the plan and its associated evidence as a whole looks to demonstrate why the proposed allocation

is justified, is deliverable and will be effective in meeting the requirements of the plan and national government guidance.

8 Strategic Policies

Policy STR/SS 1

8.4 In noting the requirements of policy STR/SS 1, we would: a) question whether it would be preferable that rather than deal with east, west, north, and central Paddock Wood as a single entity to have specific policies for each area, as defined on map 27, so that it is clear to all concerned what is required of each area. b) question the wording of [parts 2 (a, b, c, d, f, and k), 3, 4, 7, 8, 11, 12, and 15 (a(ii)) of policy STR/SS1.

8.5 Policy STR/SS 1 looks to address the development issues affecting the development of the land within east, west, north, and central Paddock Wood. These areas have, in many instances very different policy aspirations and requirements for instance the wetland park to the west and the links between the town centre and the employment areas to the north. Rather than dealing with these in an overarching policy, it would in our opinion be more appropriate to have specific policies relating to each development area, with an overarching set of guiding principles and infrastructure requirements. Attached at appendix a is our interpretation of what is required on the land to the east, which is provide without prejudice to our comments below about certain aspects of the policy currently worded. We believe an appropriate form of words could be agreed with those promoting the various areas in advance of submission/ via a Statement of Common Ground to be presented to the EIP.

8.6 Turning to the specific wording of policy STR/SS 1 as drafted we have the following comments/ concerns:

2 (a) the approximate level of development. 3,490-3,590 houses is in our opinion going to be difficult to achieve. Whilst DLA in the Strategic Sites Masterplan and Infrastructure Study refers at para 5.63 to a development of circa 3,450 homes based on an average density of between 35-38dph, we believe more detailed site assessments will see this figure reduce. To this end we note that table 7 of the strategic sites masterplan and infrastructure study suggests 1300 -1330 dwellings on land to the east, compared to the promoter's proposals for 1250. As set out above we now believe this figure to be 1200 max. Whilst others may be able to increase their overall level of provision relative to what is set out in the Strategic Sites Masterplan and Infrastructure Study we would raise a word of caution about the figures suggested and the associated impact on the housing land supply/ scale of proposed allocations.

2(b) the proposed neighbourhood centres which are to provide around 2,000sqm commercial floorspace (Class E) in total: one in each of the key development parcels as outlined on Map 27. Whilst the draft Structure Plan (map 28) provides an indicative location for the three local proposed centres, including the one to the east of Paddock Wood we would suggest that policy STR/SS 1 needs to be clear in that the location and size of this facility is not fixed, and will be subject to a retail impact assessment to demonstrate that there will be no significant adverse impact on Paddock Wood town centre / that such a facility is a viable proposition within this location (We note that para 4.21 of the Strategic Sites Topic Paper is a lot more prescriptive as to what is required and where and would suggest that this needs to be factored into policy STR/SS 1 or the supporting text).

2(c) the need for the two two-form entry primary schools: one in the western parcel (edged in blue on Map 27), and the second in the eastern parcel (edged in yellow on Map 27) needs to be fully justified by KCC and trigger dates relative to housing delivery agreed, as we understand that the provision on the current Mascalls Court Farm development is now being reviewed.

2 (d) the mechanisms for the delivery of the new sports and leisure hub on the western parcel (edged in blue on Map 27), and the manner in which this ties in with the housing trajectory needs to be clarified so as not to prejudice housing land supply.

2 (f) the provision of 'three-pitch gypsy/traveller site (to include one mobile home and one touring caravan per pitch).' on the western parcel (to the north of the railway line) and eastern parcel as shown on Map 27 has not in our opinion been justified. Annex 1 of the Housing Supply and Trajectory Paper identifies a number of gypsy/traveller sites located in close proximity to the eastern parcel, including Lucks Lane (p19), Mile Oak Stables (p27), Pearsons Green Road (p37), Vines Farm (p43), and Willow Stables (p47). The need for another facility in this area is thus questionable, especially when it is also clear from para 6.59 of the Housing Supply and Trajectory Paper that there are in fact sufficient sites to meet the need without requiring any provision on the STR/SS1 sites.

In addition, we note that Map 28 – the Paddock Wood and East Capel Structure Plan appears to suggest that the proposed site on the eastern parcel is located rear of Ledgers Cottage's and the former Ledgers Commercial Motor Services site on Queen Street, within what is SHLAA site 47, which whilst identified in the SHLAA as forming part of Local Plan Allocation STR/SS 1, does not fall within the land being promoted by Redrow and Persimmon and is not, as far as we are aware being actively promoted by anyone else. Whilst the deliverability of this facility could thus be called into question, we would also highlight the fact that initial masterplanning for the wider east of Paddock Wood site has no direct access onto Queen Street and as such is not well positioned to accommodate a gypsy/traveller site. Furthermore para 6.390 of the pre submission plan is clear in terms of site suitability and layout for gypsy/traveller sites, making it clear that, in setting out their policy, TWBC have had to have regard to the potential for noise and other disturbance from the movement of vehicles to and from the site, the stationing of vehicles on the site and on-site business activities; and that proposals should not detract from the amenities or privacy of neighbouring uses. Whilst the indicative location shown on Map 28 may have been able to meet these criteria, we do not believe placing such a facility within the heart of the wider development will contribute to the garden settlement principles and design objectives policy STR/SS1 looks to promote for the land east of Paddock Wood.

In the context of the above we note that the Strategic Sites Masterplanning and Infrastructure Study Feb 2021 at para 5.60 suggest that:

'Draft policy also requires provision of a serviced Gypsy & Traveller site of 3 pitches. Location of this facility remains flexible within the Structure Plan, however the following assumptions about location have been made:• Travelling (transitory) pitches should be located adjacent to the A228, ideally in the northwestern parcel• Permanent pitches should be located in the south-east of the site, adjacent to Church Lane'

The area identified on map 28 does not reflect the above. Which, given our comments about the SA (above), only adds to the confusion as to what is required, and the associated justification for it.

2 (k). a community hub. No indication is given as to what this means, how it will be defined/ quantified and where it is to be positioned. Is it the community hub referred to at point 6 of policy STR/PW1 at the Memorial Fields? The council need to clarify this point and justify its requirement.

3. the provision of a mix of housing types, size, and tenure to ensure a balanced, inclusive, and accessible community, the exact mix to be agreed with the Local Planning Authority at the planning application stage having regard to prevailing market conditions. 40% affordable housing should be provided on-site and phased through the development in line with Policy H3. Whilst not opposing this requirement per say we do feel it needs to be linked to the requirements within policy H3 that make it clear that a policy compliant level of affordable housing will not be required where this makes a development unviable – please see our comments on the VA above.

4. the provision of accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of older people; with at least one sheltered and one extra care housing scheme provided within the strategic site. Again, whilst not opposing this requirement per say we do feel that greater clarity needs to be provided on the scale of the sheltered and extra care provision that is being sought and where in terms of the areas defined on map 27 it is to be located. as at present this is not at all clear. Furthermore, a justification for what is ultimately required needs to be provided.

7. the phased delivery of highway and transport infrastructure, including on and off-line improvements to the A228 around Colts Hill and the provision of a new highway which bypasses Five Oak Green, as shown on Maps 29 and 33. The extent to which these relate to the proposed developments in and around Paddock Wood, relative to that at Tudeley needs to be clarified, the justification for the contributions provided and the triggers for delivery established relative to the development proposed on map 27. To this end, as highlighted in our comments on the Strategic Sites Masterplanning and Infrastructure Study it is not clear why the proposed Colts Hill Bypass is required for the expansion of Paddock Wood and Capel in isolation/ whether the on line improvements would be sufficient to address the impact of the expansion of Paddock Wood and Capel in isolation; and it is very clear that the Five Oaks Green bypass is only related to the Tudeley development. Thus, the justification behind criterion 7 needs to be provided/ the policy wording amended to reflect the evidence base.

8. provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre and the employment areas to the north of the railway line. The use of bus gates should be considered. Again whilst not opposing this requirement, we would suggest that in

order to safeguard the links identified on the draft Structure Plan as shown on map 28, a safeguarding policy is introduced actively highlighting these routes and making it clear that the land identified for safeguarding has been safeguarded to support the delivery of the strategic allocations, that if necessary, the Council will use Compulsory Purchase Powers to enable delivery of these routes to support the delivery of the strategic allocations, and that any proposals for development that may reasonably be considered to impact the delivery of the identified safeguarded routes will be required to demonstrate the proposal would not harm their delivery/ that planning permission will not be granted for development that would prejudice the construction or effective operation of the proposed safeguarded routes (Whilst para 4.27 of the Strategic Sites Topic Paper indicates that Countryside is working with TWBC to seek to achieve a bus and active travel link through its site towards the land being promoted by Redrow to ensure the network of bus links is complete, we consider this matter has to be addressed in the strategic policy to ensure delivery).

11. Consider the potential for mineral deposits on the land edged in blue and yellow on Map 27, and any viably workable minerals should be extracted prior to development commencing on the site; this clause has to have regard to the implication's minerals extraction could have on final build platforms, and the housing trajectory. As such we would suggest it is made clear that minerals extraction will only be encouraged prior to non-mineral development taking place, where this is practical and environmentally feasible. This reflects the approach adopted at the recent South Oxfordshire examination and may help address any potential impact on the housing trajectory.

12. Incorporate zero and low carbon energy production, in line with the requirements of Policy EN3, during early design stages to provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles fundamental to the design, construction, and operation stages; given our comments on policy EN3 below, we do not believe policy EB3 as drafted to comply with national government guidance and that as such this part of policy STR/SS1 needs to be revised to reflect what is justifiable in the context of national government guidance; and that the cost implications of what is proposed are borne in mind in the viability appraisal.

15. Secure developer contributions towards the strategic growth of this area and Tudeley Village, either in kind (normally land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study (February 2021) (or a version of this document as amended), to include:

a. highway improvements and mitigation measures, including:i. on- and off-line works to the A228;ii. new bypass around Five Oak Green;As with our comments on point 7 above, the extent to which these relate to the proposed developments in and around Paddock Wood, relative to that at Tudeley needs to be clarified, the justification for the contributions provided and the triggers for delivery established relative to the development proposed on map 27.

In addition, we are concerned about the reference to the Strategic Sites Masterplanning and Infrastructure Study February 2021 (or a version of this as amended). It is this latter comment that concerns us – it needs to be clear that any amendments to this document would be subject to consultation with all relevant parties – TWBC cannot unilaterally change the requirement without establishing the implications of doing so with those promoting these sites/ ensuring the local community have a chance to have their say on what is being amended and why.

Finally in terms of the proposed Structure Plan document and Framework Masterplan SPDs. The policy needs to make clear that these will be brought forward in tandem with any future applications so as to sense check what is being proposed is deliverable and to ensure that the housing trajectory is not prejudiced by additional adoptions procedures. At present the LDS seems to suggest that a draft of the Structure Plan document will not be prepared until January 2022, consulted upon in July 2022 and adopted in Oct 2022, with the Framework Masterplan SPDs running concurrently. As the Strategic Sites Masterplanning and Infrastructure Study Feb 2021, presents the Structure Plan for Paddock Wood (See para 3.14 of The Strategic Sites Masterplanning and Infrastructure Study Feb 2021), and the draft Structure Plan is included within the Reg 19 Plan (map 28), we do not see why a draft Structure Plan cannot be produced until Jan 2022 as this work has already in effect be undertaken to support the Reg 19 Plan. To this end we also note that para 5.93 of the Reg 19 Plan and para 8.19 of the Strategic Sites Topic Paper make it clear that the SPD's should be published ahead of planning permission being granted, not applications being submitted. The terminology used in policy STR/SS1 thus needs to be amended to reflect this position.

Whilst many of our comments on the strategic and development management policies are, we believe, capable of resolution by simple rewording/ a review of the evidence base so as to

justify the position being advocated, we are concerned that the extent of repetition between policies is leading to misrepresentation; and would recommend that the policy approach is reviewed with a view to being more succinct and direct in what it is seeking to achieve. This will we believe assist everyone concerned in the development process, and is something we, as inducted above, would be happy to talk to the borough council about, especially in terms of compiling a Statement of Common Ground to address the policy requirements for the land east of Paddock Wood.

To conclude, whilst we support the Reg 19 Plan and the proposed allocation of the land at Paddock Wood for strategic scale expansion, we do have a number of concerns about the overall housing supply and trajectory, the rationale behind the assessment of the reasonable alternatives assessed in the Sustainability Appraisal, and alternatives assessed; the consistency in the infrastructure requirements being sought from the development of the land at Paddock Wood in the IDP, VA and Strategic Sites Masterplanning and Infrastructure Study; the actual requirements for the land east of Paddock Wood – in terms of what, when and how much; some of the assumptions used in the VA; the wording of policies STR/SS1, STR/PW1 and justification for some of the criteria contained therein; and the wording of policies EN1, EN2, EN3, EN9, EN13, H3, H6, and H9 and justification for some of the criteria contained therein.

We would however like to highlight Redrow Homes and Persimmon South East's desire to continue to work with Tunbridge Wells Borough Council on the delivery of the proposed strategic allocation at Paddock Wood and to this end would welcome the opportunity to meet with officers to discuss our comments on the Reg 19 Plan, and our suggested Statement of Common Ground addressing the policy issues highlighted as well as the proposed phasing strategy for the delivery of the land east of Paddock Wood as soon as is practically possible.

Our Concept Plan for Land East of Paddock WoodAs you will be aware we are currently in the process of preparing an application for EISA screening, our proposals for the land east of Paddock Wood being well advanced. A copy of the illustrative masterplan that has been drawn up by the consultant team, which includes FPRC (urban design and landscape architects), Milestone (transport planners), Stantec (drainage engineers), EPR (ecologists), Keen Consulting (arboriculturists) and RPS (heritage consultants); and following detailed site assessment work is attached. This seeks to demonstrate how the land to the east and south of Paddock Wood, especially that within parcels 7, 9, 11 and 12 could be developed. This shows:

- . A development of circa 1,200 dwellings;
- . A development that looks to provide a sustainable corridor/ demand responsive bus route to the site;
- . A development that encompasses the historic route of the Hop Pickers Trail as a green corridor/ ped/ cycle link;
- . A development that is permeable and provides for enhancements to existing pedestrian/ cycle links to Paddock Wood town centre/ train station, as well as new routes to the town centre/ train station;
- . Junction improvements to the Church Road/ Pearsons Green Road/ Queen Street T junction;
- . Junction improvements to the B2160 Maidstone Road/ B2017 Badsells Road/ Mascalls Court Road traffic signals;
- . A development that provides for the further expansion of the Mascalls school site and a potential primary school (if required);
- . A development that respects the fluvial flood plain, by ensuring all development is within flood zone 1, and utilises land to the north as a surface water attenuation zone that will be planted to reflect landscaped floodplain characteristics and include wet meadows with grassland and structural planting that will be managed for biodiversity and amenity benefits;
- . A surface water drainage strategy that looks to incorporate SuDs features to provide for flood storage, attenuation, and mitigation areas so as to address the effects of the proposed development – including a 40% allowance for climate change and help reduce flood risk elsewhere;
- . A development that looks towards an integrated landscape, drainage and ecological strategy that protects wildlife corridors, links existing corridors, and creates new corridors, so as to create biodiversity net gains;
- . A development that retains and protects existing ponds and provides suitable buffers to these and areas of ancient Woodland that fall within the area;

- . A development that is landscape led – retains existing trees and hedgerows where possible and provides for generous structural planting and landscape buffers to soften the edge of the new settlement / protect the setting of the High Weald AONB to the south;
- . A development that provides a generous amount of good quality green space, including open space, youth and children's play areas, sports and other recreational facilities;
- . A development that provides for a local centre, allotments, and community orchards;
- . A development that looks to protect the setting of heritage assets and local views and remove jarring features - such as overhead lines.
- . A development that seeks to preserve the character of Queen Street as a rural lane and the setting of the historic farmsteads within the local area;
- . A development that provides for suitable buffers around existing properties so as to retain their character and amenity; and
- . A development that is set back from the railway and thus railway noise.

The above and attached clearly demonstrates a scheme that can accommodate the requirements of policies STR/SS1 and STR/PW1 and the aims and aspirations for the site as set out in the Strategic Sites Masterplanning and Infrastructure Study, IDP, VA and TARU.

We believe that the development of the land to the south and east of Paddock Wood can come forward in a timely way, as part of a comprehensive suite of sites in and around Paddock Wood, to help accommodate the housing needs of the area. Predicated on the emerging Structure Plan and associated Framework Masterplan SPDs the strategic scale expansion of Paddock Wood can provide tangible benefits for the local community in terms of improvements to the strategic highway network, as well as local routes, improvements to public transport provision, enhanced pedestrian and cycle links, reduced flood risk, expansion to the local primary and secondary education provision, new sports facilities, new play facilities, new health and medical facilities, a new community hub and new social and leisure facilities. Said development will also provide for much needed family sized housing, affordable housing and starter homes without any adverse environmental or landscape impacts. Indeed, as set out in the Reg 19 Plan, the strategic scale expansion of Paddock Wood provides an opportunity to provide for significant landscape and environmental improvements.

We look forward to talking to you further about the above.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed Policy Wording – SSR/SS1a – The Strategy for Land East of Paddock Wood

The development strategy for Land East of Paddock Wood is to: 1. With Policies STR/PW 1 (the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish), set provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period and beyond. This is facilitated through the release of Green Belt land; 2. Provide for the expansion of Paddock Wood to the east, which will deliver the following, on the broad locations as identified at Map 28: a. approximately 1,200 dwellings; b. a neighbourhood centres providing around 700sqm commercial floorspace (Class E). The broad location of the neighbourhood centres will be defined through the Framework Masterplans, and should be located to maximise accessibility by foot from the new dwellings to serve local shopping needs; c. a two-form entry primary schools; d. a system of paths and cycle routes, linking out of the town to nearby villages and leisure routes, such as the Hop Pickers Trail; 3. Provide a mix of housing types, size, and tenure to be provided to ensure a balanced, inclusive, and accessible community, the exact

mix to be agreed with the Local Planning Authority at the planning application stage. Forty percent affordable housing should be provided on-site and phased through the development in line with Policy H3, unless otherwise agreed in accordance with the proviso's set out in Policy H3;4. Provision to be made for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of older people;5. Be developed to a high standard of design and layout. Particular attention to be paid to layout, scale, height, design, and massing to ensure that the development is of a high quality design responding to local character. Planning applications for development should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application;6. Ensure the development embeds the garden settlement principles. Planning applications need to demonstrate consideration of the associated key qualities as outlined in the supporting text;7. Provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre. Land will be safeguarded for this purpose, and the use of bus gates should be considered;8. Provide walking and cycling linkages within the site, together with links to Paddock Wood town centre, employment areas, and surrounding countryside. The development should make use of, and enhance, the Hop Pickers Trail;9. Consider the potential for mineral deposits on the land edged in blue and yellow on Map 27, and any viably workable minerals should be extracted prior to development commencing on the site where this is practical and environmentally feasible;10. 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 substantial development on the site, unless exceptional circumstances arise. 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;11. Provide a scheme for the management and funding for green spaces and green infrastructure for each parcel of land as outlined on Map 27, for both amenity and biodiversity for the lifetime of the development;

12. Secure developer contributions towards the strategic growth of this area either in kind (normally land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study (February 2021) (or a version of this document as formally consulted upon and amended), to include:a. highway improvements and mitigation measures, including on- and off-line works to the A228;b. provision, improvements, and enhancement to bus and cycle routes, and cycle corridors;c. primary and secondary education provision;d. health and medical provision;e. utility provision and upgrades;f. flood defences and mitigation measures;g. improvements and enhancement to sports and recreation provision, including children's and youth play space;h. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind. The development will be delivered through the production of a Framework Masterplan Supplementary Planning Documents (SPD). The Framework Masterplan will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood. The SPDs will set out guidance to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site. It will provide guidance on design, phasing, and site access to ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood. Proposals for the piecemeal development of individual sites within the parcels identified will not be supported. 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 & Malling and Maidstone Borough Councils) and other statutory consultees. It is highly likely the delivery of the development will require land equalisation agreements. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Redrow and Persimmon have an interest in land east of Paddock Wood – part of STR/SS1, one of the main strategic allocations in the Plan. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan. They therefore wish me to participate in the examination

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_137

Comment

Consultee	Mr Alan Chilvers [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Residents of Golden Green Association & KeepKent.Green
Address	[REDACTED] [REDACTED] Tonbridge, Kent TN11 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Residents of Golden Green Association & KeepKent.Green (Mr Alan Chilvers - [REDACTED])
Comment ID	PSLP_2027
Response Date	04/06/21 11:48
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_2026-2031, 2033, 2037-2040 KeepKent.Green & Residents of Golden Green Association Representation
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Golden Green Residents Association & KeepKent.Green
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

[TWBC: the following extracts are from the representation submitted by KeepKent.Green and the Golden Green Residents Association - for the full representation, please see supporting documents]

KKG Objects to Policies STR/SS1 and STR/ SS3 as well as providing additional commentary on other policies, that lead to conclude the Local Draft Plan is not legally compliant, is not positively prepared, is not justified or effective or consistent with NPPF.

Key constraints in developing the Paddock Wood & Capel East Sites (STR SS1)

- . **This important buffer between Paddock Wood and Tonbridge** should be retained as a Green Belt. Further development within this plan and future plans will produce vast Urban Sprawl,
- . **The local infrastructure accessing** Tonbridge and Paddock Wood is inadequate for the huge traffic increase which so many houses would introduce.
- . **Large parts of the developments** will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change.
- . **Building the proposed developments** on a known floodplain that is one of the largest flood storage areas in the UK .
- . **Flooding** - TWBC wants to build on category 2 and 3a flood risk areas. Huge amounts of developers' money will inevitably be spent on flood mitigation, diverting funds from other essential infrastructure.
- . **Flood mitigation** measures may help, but we believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk
- . **Replacement of natural** historic functional floodplain with man-made storage facilities

- . **Further flood** risk to existing communities
- . **Sites have a long history of flooding.**
Lack of critical detail with regard to flooding.
- . **Major reliance** on the upstream Leigh barrier which is in the process of installing additional storage capacity, this will put further pressure on the floodplain as when the barrier is at capacity the excess water is released onto the floodplain.
- . **2013** saw unexpected excess rainfall that led to the Leigh Storage facility almost overtopping leading to 1,000's of homes being flooded, the partial removal of the natural floodplain could potentially cause a flooding emergency evacuation as seen in other parts of the country in recent years.
- . **Local sewerage infrastructure already inadequate**
- . **This land is Green Belt** land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel.
- . **Paddock Wood** will be 65% of total development proposed within the entire borough of TW.
- . **No cumulative impact assessment or environmental impact assessment** evaluating the overall effects of the combined developments and mineral extraction will have on the parish of Capel.
- . **Kent County Council Minerals allocation**, safeguarded land, rail bulkhead at Beltring (Clubbs) Cumulative Effect, Transport increase with HGV's accessing these sites. Sensitive receptors.
- . **"Consider the potential for mineral deposits** on the land edged blue and yellow on Map 27, and any viable workable minerals should be extracted prior to any development commencing on the site."

Although these mineral sites have been safeguarded by KCC they still require planning permission, it should be noted that KCC granted planning permission to recommence extraction in 2019 at neighbouring Stonecastle Farm Quarry, to date no workings have commenced due to a number of ecological, environmental and restoration issues. One of the planning conditions stipulates mineral extraction from other sites will have to be operated consecutively after the mineral extraction has been completed at Stonecastle Farm Quarry. This could have significant delays to the proposed phasing to the housing and infrastructure proposals within the whole area.

- . **Other more sustainable viable sites are available**
- . **Loss of greenfield land** with Best and Most Versatile soils (Policy EN22)
- . **To Protect best and most versatile land** and most versatile agricultural land from significant inappropriate or unsustainable development.

Planning applications will need to justify why the loss of best and most versatile agricultural land will need to justify why the loss of agricultural land is acceptable and also assess the impact of loss of agricultural land on a wider farming resource and ecosystem services.

- . **Moat Farm & Whetsted Farm**, -unemployment. Loss of food etc losses to the rural economy from developing upon agricultural fields.
- . **Development** in the south and east meaning some residents may be outside of desirable walking distances to the central facilities
- . **Many Environmental issues** highlighted in the SA Pre Submission, size of the Development (4,000 Dwellings), water resources, existing sewer and waste infrastructure can not cope with latest Berkley homes development even with the addition of upgrades within the site.
- . **The provision for open space**, additional sports facilities will be located within the Parish of Capel and not within walking distance of Paddock Wood.
- . **Population in Paddock Wood** = 8253 (2011) will increase by at least 8,000 if 4,000 dwellings go ahead.
- . **Major Transport issues** A228, Colts Hill, link road between Tudeley Village and the A228, B2160,B2017,A26
- . **Lack of consultation** with other LPA's Local Plans - TMBC.
- . **Lack of close liaison** and involvement with local communities and organisations,infrastructure providers, statutory consultees and neighbouring authorities.

Conclusion

The PSLP has demonstrated there continues to be extensive issues and concerns, especially regarding the 2 strategic sites of STR/SS 1 Paddock Wood and East Capel and STR/SS 3 Tudeley Garden Village.

Many Issues and questions raised within Reg 18 from the wider community, local residents and neighbouring LPA's continue to be unanswered, it lacks critical evidence.

The overall impact of the TWBC Local plan by allocating over 50% of its total housing requirements, so close to its boundary with TMBC , highlights TWBC has not considered the substantial liabilities it will impose on Tonbridge Town, Maidstone, Paddock Wood, Capel and surrounding villages within TMBC.

With other neighbouring LPA's who are also at various stages of their own local plans, TWBC PSLP should be delayed or withdrawn until further engagement is achieved and agreed policies and strategies are established. To continue with the current strategic sites strategy will condemn these towns and villages to an environmental disaster.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

KeepKent.green would like to attend and participate in any Inspectors Hearing regarding the TWBC Local Plan.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 2026-2031, 2033, 2037-2040 KeepKent.Green & Residents of Golden Green Association Representation](#)

Comment

Consultee	Andrew Richards ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Andrew Richards ([REDACTED])
Comment ID	PSLP_2101
Response Date	03/06/21 21:42
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr Andrew Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 9 Green Belt

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR 9, STR/SS 1 and STR/SS3 – see Comment Numbers PSLP_2096, PSLP_2101 and PSLP_2102]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Green Belt

- 1 The Pre-submission Local Plan (PSLP) proposes to remove over 330ha of land from the Green Belt to satisfy the Tudeley and Paddock Wood garden settlements (PSLP table 6). However, this use of Green Belt land runs counter to the NPPF and more recent clarifications provided by Government. Specifically:
 - a. The Government first set out its position in 2014 when posing the question “Do local planning authorities have to meet in full housing needs identified in needs assessments?” (<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>). The answer provided was as follows:
 - (1) Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.
 - (2) However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need. (my emphasis)
 - b. This was amplified in 2016 when the Minister for Housing and Planning stated:

“The Government are committed to the strong protection and enhancement of green-belt land. Within the green belt, most new building is inappropriate and should be refused planning permission except in very special circumstances”. (Hansard, 18 Jul 16)
 - c. This is reinforced by the NPPF para 11b which states:

“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

 - (1) the application of policies in this Framework that protect areas or assets of particular importance [footnote refers to Green Belt] provides a strong reason for restricting the overall scale, type or distribution of development in the plan area, or

(2) *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*".

d. This is further supported by the NPPF para 145: "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt", with a list of exceptions, none of which apply to proposals of the magnitude proposed for Tudeley or Paddock Wood.

e. The Government has recently (April 2021) clarified its position on the use of Green Belt. (see web link). Specifically:

(1) *"We heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."*

(2) *"Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints."*

f. This is reinforced by other guidance, for instance

<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>:

(1) Should plan-makers override constraints, such as Green Belt, when carrying out the assessment to meet identified needs?

"Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas)." (Paragraph: 002 Reference ID: 3-002-20190722)

g. The above policy and guidance is summarised concisely in the following terms

(https://www.designingbuildings.co.uk/wiki/Green_belt_planning_practice_guidance):

"The government's policy position is broadly that the green belt be protected almost at all costs, but consequently that development needs (in particular for new housing) will have to be accommodated in sustainable locations in other areas (including open countryside) outside the specific designations where planning policy imposes specific constraints"

1 It is worth noting, consistent with the above guidance, that TWBC rejected a planning application ref 18/01767 from the Poacher pub on Hartlake Road (immediately adjacent to the proposed garden settlement at Tudeley) on the grounds it would intrude on Green Belt, noting as a reason for the refusal:

a. *"The proposal would constitute inappropriate development within the Metropolitan Green Belt, which by definition is harmful to its openness. There is insufficient evidence of the necessary 'very special circumstances' to overcome this harm. The proposal is thus contrary to . . . and the National Planning Policy Framework 2018"* (rejection letter dated 31 Jul 18)

3.. Supporting documents to the PSLP recognise the harm that would be caused to the Green Belt by the two proposed settlements at Tudeley and Paddock Wood. Specifically,

a. The Development Strategy Topic Paper identifies that there would be a 'high' level of harm to the Green Belt from the two settlements, which would remove more than 330ha from Green Belt (https://tunbridgewells.gov.uk/__data/assets/pdf_file/0008/388016/Development-Strategy-Topic-Paper.pdf) – table 4

b. The Stage 3 Green Belt Study identifies the risk of the Tudeley and Paddock Wood settlements merging into each other when it states

(https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/385317/Green-Belt-Study-Stage-Three_Rev1.pdf):

(1) *"The fundamental purpose of the Metropolitan Green Belt is to prevent the sprawl of London and, as part of that, preventing other settlements growing towards London. Therefore, it makes sense to prevent Tunbridge Wells, Paddock Wood and Tonbridge from merging into one another"* (para 5.32).

(2) *“To the east, the release of AL/CA1 along with the expanded Paddock Wood (AL/PW1) will create a gap of approximately 1.8km between Tudeley Village and Paddock Wood. However, existing intervening urban development at Five Oak Green, washed over development on Badsell Road, rail and road connections, and a lack of significant separating features will reduce the perceived gap. This will, without mitigation, weaken the strength of separation between the inset edge of Tudeley Village and existing inset development at Five Oak Green, although will still provide a level of distinction between the two settlements”* (para 4.114).

4. The NPPF (para 137) requires LPA's to engage with others through statements of common ground to address any remaining unmet need before any encroachment on Green Belt:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

However, there is limited evidence of TWBC having engaged with other LPAs to address any unmet need that would arise from removal of the Tudeley and Paddock Wood proposals. For instance, there is no agreed Statement of Common Ground between TWBC and TMBC. Similarly, the engagement record between TWBC and TMBC shows only limited discussion of unmet needs and what seems to be a belated realisation by TWBC that it needed assistance (Duty to Cooperate Statement, Appendix C5 - https://tunbridgewells.gov.uk/__data/assets/pdf_file/0003/388020/Duty-to-Cooperate-Statement_2021.pdf)

- . 14 Dec 18 meeting stated “TWBC indicated could meet their own OAN”
- . 18 May 20 “discussion about unmet need”
- . 6 Oct 20 “TWBC formal request to TMBC to meet unmet TWBC housing/employment need”
- . 14 Oct 20: “TMBC response”

I am therefore of the view that TWBC has failed to meet its duty under the NPPF to engage meaningfully with neighbouring LPAs to seek their assistance to meet the TWBC identified need for development (see also separate representation on the wider failure to meet the Duty to Cooperate).

5. The Development Strategy Topic Paper adopts a circular argument when it states (para 6.200) *“The assessments undertaken to determine the most appropriate locations for a garden settlement were unable to identify sufficient suitable and deliverable land in areas wholly outside of the Green Belt”*. This presumes a need to establish a garden settlement, whereas other options (such as urban infill) have not been fully explored.

6. I therefore conclude that TWBC has failed to meet the policy requirements placed on it regarding Green Belt land, and that its proposals in respect of Tudeley and Paddock Wood are therefore **unsound** and should be withdrawn from the PSLP

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 I acknowledge the challenge TWBC faces in balancing the competing demands for housing with the need to protect the Green Belt. However, the NPPF and other guidelines are clear about the need to preserve the Green Belt. The council therefore needs to investigate alternative sites, engage

more pro-actively with neighbouring boroughs that do not face similar constraints on Green Belt, and if necessary declare that the OAN is not achievable. Government guidance on this is set out in a range of ways:

a. Recent guidance (April 2021) encouraged greater scrutiny of urban areas:

(see web link). Specifically:

(1) *"In relation to the cities and urban centres uplift, we have heard representations that we can do more to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method. There are three strong reasons for doing so. First, building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops. Second, there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces. And third, our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel."*

b. TWBC has examined only settlement options presented to it through its Call for Sites, a reactive approach, and has not adopted a more pro-active approach of searching out sites suitable for garden settlements outside the Green Belt that could be acquired through compulsory purchase or other means.

(1) The planning guidance on this clearly encourages a pro-active approach (see <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>):

How can sites/broad locations be identified?

"When carrying out a desktop review, plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed)"

"It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area" (Paragraph: 010 Reference ID: 3-010-20190722)

2. Given this policy context, I believe TWBC needs to take a second look at some areas it has currently discounted from consideration. For instance, Frittenden lies outside the Green Belt, is in a very rural area (similar to the proposed development at Tudeley), benefits from a railway station at Headcorn and (a little further away) a separate railway line at Ashford, and would yield around 1,500 dwellings, yet is declared in the SHELLA as unsuitable in the following terms (see web link):

"Matters relating to the very rural setting and remoteness of the settlement, highway infrastructure, and distance from access to high level services and employment, heritage and land ownership mean that this site is unsuitable"

I appreciate that the fragmented nature of the land parcels would require more effort from TWBC, including a more active role in masterplanning, and that investment would be required in the road and gas network. However, a level of infrastructure investment will already be required for the proposed Tudeley settlement, so at a superficial level the two options are comparable. More fundamentally, exploring options such as Frittenden could ease pressure on Green Belt whilst allowing the vision of self-contained garden settlements to endure.

3. Similarly given the policy context, even at this late stage, TWBC should establish a dialogue with neighbouring LPAs that do not face similar Green Belt or AONB constraints (notably TMBC and Maidstone) to explore the scope for them to address some of the identified need from TWBC.

4. If these various avenues do not allow TWBC to achieve its identified needs, then per the planning guidance the PSLP will need to declare this.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I feel strongly that Green Belt land should be maintained for that purpose and would wish to contribute to any discussion on this topic.

Supporting Information File Ref No: SI_149

Comment

Consultee	Andrew Richards ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Andrew Richards ([REDACTED])
Comment ID	PSLP_2123
Response Date	03/06/21 21:42
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Supporting Information STR1 Appendix D.pdf
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr Andrew Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 1 The Development Strategy

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policy EN 25 Flood Risk

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Flood risk – Paddock Wood

- 1 I believe the Pre-submission Local Plan (PSLP) has failed to address adequately the risk of flooding, both now and in the future. Policy on this is clear:
 - 1 The NPPF states that:
 - . “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.
 - 2 And the PPG provides further clarification:

“What is considered to be the lifetime of development in terms of flood risk and coastal change?”

 - . Residential development should be considered for a minimum of 100 years . . .” (Paragraph: 026 Reference ID: 7-026-20140306”
- 1 The PSLP correctly identifies flooding as a key issue/challenge in a number of places such as para 2.33, the Development Strategy (STR 1), and against the strategy for Paddock Wood (STR/SS1) in particular. The Level 2 SFRA (para 5.1.4) concludes that “the assessment generally shows that the principle of development can be supported. . . . An exception to this general conclusion is the eastern development area considered at parcel 1 [in Paddock Wood]”.
- 2 However, it is not clear that the analysis is sufficiently complete to make such statements. For instance, flood risk modelling was undertaken by “raising developed areas completely above the flood level” with the unsurprising result of removing flood risk to the affected parcel and increasing downstream risk. The SFRA acknowledges that “the representation of development in the model has been simplistic” and identifies a range of measures (unmodelled) that could be adopted to improve flood resilience, but then surprisingly concludes “the outputs show that the principle of development can be supported”. I disagree and regard this statement as **unsound**.
- 3 For those sites facing more pronounced flood risks (parcels 1, 2, 3, 5 & 6) the SFRA states that “more substantive interventions are needed to manage the change in flood risk”. In particular, for parcel 1 (part of the Paddock Wood site), “strategic storage of flood water was the approach with the potential to mitigate the increased risk . . . (although other flood risk management measures considered could contribute)”. This is both vague and likely to be expensive, so the SFRA unsurprisingly concludes “it is important to investigate the potential for this measure to be realised”. Such incomplete analysis is no basis on which to state that the principle of development on such a strategic site as Paddock Wood can be supported, so again this assertion is **unsound**.

- 4 There is also a not unreasonable presumption that developers will pay for the flood mitigation measures. For instance, para 4.91 specifies that *"it is expected that future infrastructure to mitigate the impact of development, or in the case of the strategic sites at Paddock Wood to deliver 'betterment' in flooding terms to particular areas, should be largely funded by development to ensure that the development is acceptable in planning terms"*.
- 5 However, the level of flood risk mitigation set out in the SFRA for Paddock Wood and some other parcels is acknowledged to require the raising of land, storage of water, and potentially further measures, and then additional analysis (see para 4 above). The costs associated with these measures are not consistent with the aspiration in para 4.91 to seek development funding. Indeed, this logic of seeking developer funding for such significant interventions is particularly flawed given the acknowledgement in the SFRA Appendix I (Parcel 1) that raised ground floors (for individual properties) *"was not implemented as it was agreed with the council that it would be unlikely to be deliverable given the scale and type of development being proposed"*. If developers cannot be expected to pay for raising ground floors then it is **unsound** for the PSLP to assume they will pay for the larger scale interventions illustrated in the SFRA.
- 6 In passing, it is worth noting (anecdotally) that housing currently being built in Paddock Wood is not popular with prospective purchasers, who are put off both by the area's reputation for flooding and by the cost associated with flood mitigation measures.
- 7 There is then the issue of climate change to consider, and the impact of the 2080 forecasts on flood risk. The NPPF para 155 requires the PSLP to demonstrate that each development will be *"safe for its lifetime"*, defined as 100 years. The developments at Paddock Wood (hand-drawn outline in red) have been overlaid against the maps in SFRA Appendix D and the results are shown below.

(TWBC Comment - map included within comment has been appended to this comment)

9. This shows (in orange and green) the expansion to be expected in the extent of flood zone 3a arising from climate change in 60 years time, which increases the already considerable risk facing Paddock Wood. These developments would not be safe for their lifetime, so the PSLP in this respect is not compliant with national policy.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy for Paddock Wood needs to be re-appraised. It is a known flood risk area that will get worse with climate change. Proposals to seek developer funding for the significant flood mitigation measures required are not credible (at levels that would be economically attractive for purchasers) and need to be re-thought.

Question 7

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_114a-d

Comment

Consultee Mrs Carol Richards [REDACTED]

Email Address [REDACTED]

Address [REDACTED]
[REDACTED]
Tonbridge
[REDACTED]

Event Name Pre-Submission Local Plan

Comment by Mrs Carol Richards [REDACTED]

Comment ID PSLP_1863

Response Date 04/06/21 11:43

Consultation Point Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel ([View](#))

Status Processed

Submission Type Email

Version 0.10

Files [C Richards - Supporting Information - section A and section C.JPG](#)
[C Richards - Supporting Information - map A.JPG](#)
[C Richards - Supporting Information Map B.jpg](#)
[C Richards - Supporting Information - table A.JPG](#)

Data inputter to enter their initials here KH

Question 1

Respondent's Name and/or Organisation Mrs Carol Richards

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policy STR/PW1 The Strategy for Paddock Wood

[TWBC: this representation has been input against Policies STR/SS1, STR/PW1 and STR/CA1 – see Comment Numbers PSLP_ 1863, PSLP_1874 and PSLP_1875]

Question 4

Do you consider that the Local Plan:

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The whole of TWBC's Local Plan is basically centred on pages 138 – 175. This is the crux of their planning and nearly everything else in this huge planning pack is their justification for this concentrated 3 site plan – Tudeley/ Capel / Paddock Wood. The allocations by Parish Table 4 show the pathetically small numbers of homes being considered in other Parishes- 32%. and if you exclude Tunbridge Wells too - it is 17%. This has not been positively prepared and planning urban sprawl- which is essentially what is being planned is not justified and is NOT consistent with national planning policy – 133 NPPF. It is not effective to concentrate such a large number of homes on one area of the borough without carefully considering areas not on Greenbelt/ANOB/Floodplain.

Comparing Table 3 page 36 of the Local Plan-the minimum allocation of housing need 2020 to 2038 is stated as 7,221. Table 4 page 42 of the Local Plan has a Housing Distribution total of 8,076 . Bearing in mind TWBC could resist the 'need' due constraints of Greenbelt/ANOB –and Floodplain and recent government advice (Changes to Current Planning system ! April 21) this 'need' could have been reduced. This should have been TWBC's first argument way back in the planning. They should have pushed back on the numbers i.e. 'need.'

Secondly looking at table 3 the 2.800 homes at Tudeley and the 4000 at Paddock Wood /Capel make up a total of 6,800 – this is 94% of the 'need,' for Table 4 it is 84% of the Distribution of Housing Allocation. Either way this plan is so concentrated on the northern Floodplain boundaries of Tunbridge Wells Borough it is again totally disproportionate and unjustified , unsound .

The proposal to build urban sprawl along the Floodplain Boundary Tunbridge Wells Borough is not justified and is not consistent with National Policy

Paddock Wood

The area around Five Oak Green and Paddock Wood is situated on the Low Weald, which is relatively flat underlain by impermeable WEALD CLAY. This means that water cannot soak into the ground AND the FLAT LAND MEANS it cannot flow away-it just lies on top.

The extension of Paddock Wood is not justified as the supply of a large number of homes on The Medway Flood Plain is against policy. NPPF guidelines state 155 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime (lifetime is classified as a minimum of 100 years) without increasing flood risk elsewhere. The JBA report Level 1 Site summary assessment – flood risk and spatial datasets shows:-

Nearly all call for sites in the Paddock Wood / East Capel /Tudley are classified as 25%-100% of being in Flood zone 2/3a/3b if not now by 2080.

The Proportion of sites within Flood 3a as of now -60 sites in total- 43 covered Tudeley or Rive Oak Green or Paddock Wood .

The future- Proportion of site within future flood zones 3a-79 sites -45 covered Tudeley/ Five Oak green/ Paddock Wood.

None of this analysis has used 2019 information, which bearing in mind TWBC are looking to PLAN to 2036 is not up to date enough.

Table 13-1 shows the sites most at risk and TWBC have chosen nearly every one of them for their 'Masterplanning'. The cost of attempting to use these sites will require SuD's and other methods to attempt to reduce the impact of future flooding at these sites to the tune of £12million (Appendix 1: Infrastructure Delivery Plan Table 16 p98 and 99) . Why would anyone in their right minds chose the worst sites to build on i.e. the ones most likely to flood now and in the future?

The provision to mitigate flood risk and surface water management should be used to protect the current homes at risk- not planning more homes to be at risk and then, to try to protect them!

There is policy emphasis in the NPPF to steer development away from areas with high flood risk. Planning Practice Guidance states that :- *The National Planning Policy Framework set strict tests to protect people and property from flooding which all local authorities are expected to follow. Where these tests are not met, National policy is clear **that new development should not be allowed.** Making these proposals unsound.*

The Tudeley Site

Tudeley lies on a ridge above the Medway Flood Plain and this means the precipitation on hard -standing areas, of 2,800 homes- will cause faster run-off during a large event- into the flood plain below:

The OS Map below shows the cross sections taken from The B2017 Five Oak Green Road on the ridge- to show the topographic affects of surface water flow down the slopes - running into the valley below and into the Medway. Hardstanding on this ridge will cause increased rate of flow causing flash flooding in times of wet weather when the ground is already saturated. NPPF163 states, When determining planning applicatins. Local planners should ensure that flood risk is not increased elasewhere. TWBC have failed to this with the proposal of building at the Tudeley site.

(TWBC Comment - Map A included within the comments has been appended to this comment)

Profile of Ridge From Five Oak Green Road (B2017) to the Flood Plain of the River Medway – (only 2 of the 5 shown) Section A and Section C

(TWBC Comment - sections A and C included within the comment have been appended to this comment)

Climate change is predicted to increase rainfall intensity in the future by up to 40% (for the Upper End estimate to the 2080s epoch (2070 to 2115) under the new range of allowances published by the Environment Agency. This will increase the likelihood and frequency of surface water flooding, particularly in impermeable urban areas, and areas that are already susceptible. Changes to predicted rainfall should be incorporated into flood risk assessments and drainage and surface water attenuation schemes associated with developments. Is there a specific assessment for Tudeley to assess surface

runoff? There has been no consultation with TMBC/ Maidstone as far as I can see the potential to cause flooding onto the floodplain which will affect towns in TMBC/ Maidstone.

Historical flooding

- . The River Medway is the largest river catchment within the Environment Agency's Southern Region.
- . The floodplain (defined by the Environment Agency's Flood Zone 3) of the River Medway lies to the north of Tudeley, Five Oak Green, Paddock Wood. With the tributaries Alder Stream, Tudeley Brook and River Teise.
- . The Leigh Flood Storage Barrier is located approximately 3 km west of the Tudeley. It was designed to protect Tonbridge from flooding and is the largest on-line flood storage reservoir in Europe, retaining a volume of 5,580,000 m³. (This just added just as an indicator to the level of water that this area has to cope with.) There are plans to increase this capacity by 2023.!

Gov.uk . Shows the Flood Map for Planning

This is a very powerful visual reminder of the area where TWBC have chosen to put the large number of homes 2016 -2036- up to 6,800 in total. Flooding will continue to increase with Climate Change-forecasting wetter winters. Why chose here?

(TWBC Comments - map B included within the comment has been appended to this comment)

The events of 1960, 1963, 1968, 1985, 2000 and 2009 caused widespread flooding within the north of the borough e.g. at Paddock Wood and Five Oak Green, and areas along the River Teise, due to heavy rainfall over a prolonged period of time. Since this time, significant flooding occurred within the borough during the Winter 2013/14, which included notable flooding from The River Medway, as well as August 2015. Climate change predicts more rainfall and more frequency of flooding. We can all still remember 2013/14 in this area, and the biblical flooding of the winter of 2019/20.

It is not effective to 'plan' to build on floodplains or cause harm downstream. It is not justified and is not consistent with National policy. NPPF 149,155.163 Unsound.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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TWBC could start by looking at areas with fewer properties at risk. Table 3 shows the Properties At Risk :

(TWBC Comment - Table A included within the comments has been appended to this comment)

Capel and Paddock Wood **already** have the greatest number of homes at risk in the whole of the borough as circled and TWBC propose more homes in these same boroughs. Totally unsound. On these figures I wouldn't look at Lamberhurst either. TWBC need to return to the call for sites and re-do the Local Plan it relies on three main sites fraught with difficulties. The whole of the local plan centres on these three sites and will cause problems for the future. The plan is unsound.

Prospective buyers will look at these homes and will not buy them. They will be difficult to insure, and they will only have to flood once and people who do buy will not be able to sell them. There are other sites that do not have the Medway so close to villages and towns.

TWBC need to look at other sites not in ANOB/ Green Belt/ Floodplain- Horsmonden and Frittenden and meet the housing REDUCED NEED by directing growth to main towns i.e. growth strategy 5; They

need to reduce the number of homes at Paddock Wood to 1000/1500 and build all homes well above ground level-.with rising sea levels this area is at even greater risk. They also need to sort out the existing sewage issues at Paddock Wood - there are no main drains. TWBC need to NOT build at Tudeley and Capel the Transport issues and proximity to Tonbridge are too harmful and unjustified.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_117

Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1878
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.10
Files	C Richards - Appendix D Climate Change Flood Zone 3a map.JPG
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Policy STR/SS2 The Strategy for Paddock Wood Town Centre
Policy STR/PW1 The Strategy for Paddock Wood
Policy STR/CA1 The Strategy for Capel Parish

[TWBC: this representation has been input against Policies STR/SS1, STR/SS2, STR/PW1 and STR/CA1– see Comment Numbers PSLP_1878, PSLP_1887, PSLP_1888 and PSLP_1889]

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

5.153 TWBC's Local plan for Paddock Wood including Capel is for a **significant** expansion along with Tudeley – which I have commented on earlier. 5.157 to 5.162. describe the 418 hectares STR/SS1 is to be built on.

5.163 States, ' Fluvial flood risk is a considerable factor affecting the western side of Paddock Wood and the Town Centre-.Flood zones 3 an flood Zone 2

5.164 States, the area to the north is Flood Zone 2 and 3 from the upper Medway flood plain.

5.165 States that groundwater levels are high I the northern western parts due to the proximity of the Upper Medway Flood Plain.

5..231 Paddock Wood is located on relatively flat land, associated wit the broad valley of the River Medway and the soil is impermeable Wealden clay.

In Paddock Wood Stage 1 SWMP (2011) and Stage 2 SWMP (2015) Paddock Wood is an area that has experienced a number of incidents of surface water flooding associated with small watercourses, sewerage and private drainage systems. It was recommended within the Tunbridge Wells Borough Council Level 2 SFRA (2009)that Paddock Wood be designated as an 'area of critical drainage'.

In recent years 100 homes have been built around Mascalls Farms and Court Farm. There have been problems with the new developments with Flooding and sewage. This area is not covered by mains drains. I have heard hearsay many times about the flooding and sewage problems at Paddock Wood and also the fact that houses are not selling.

STR/5 states that TWBC fully consulted Southern water regarding the supply of fresh water and the removal of foul, yet Greg Clark MP for Tunbridge Wells was advised on record, 'Plans to upgrade the

sewage network in Paddock Wood, despite repeated discussions with Paddock Wood Town Council – have come to nothing . (HoC 28/10/19)

This just demonstrates to me the ineffectiveness of infrastructure planning – if the basic needs of water and sewage cannot be sorted out quickly NOW – what does this say for the future? TWBC are proposing to build 4000 homes in this area. More homes will mean more problems. This failure to effectively sort out these issues brings into question the effectiveness of the proposed infrastructure.

It is also worth noting that TWBC are relying very heavily on Development contributions -which are incorporated into the house price. This is not going to provide affordable housing, where large amounts of money will be needed to be spent by the developer trying to mitigate the huge flood issues at Paddock Wood and Five Oak Green. If they do get built and sold- one bad flood, which is inevitable, and homeowners will be left with homes they cannot sell or insure. This is totally and utterly immoral- to build houses in a flood zone area 2 and 3 and cause so much distress to the homeowners. It is unsound, unjustifiable and should be illegal. This is not an effective planning policy and has been poorly prepared. They do not even take their own advice:- The TWBC Development Constraints Study states on p 9- 2.19 Flood zone 3 should be a significant constraint' and all the sites at Tudeley/Five Oak Green/ Paddock Wood have a % of Zone 3 areas. (Table 3-1 of Site summary assessment) p91-108

The report Commissioned by TWBC p111 (T.Wells Level1/2 SFRA)- even that recommends :14.6.2 Future Developments Development must seek opportunities to reduce overall levels of flood risk at the site, for example by:

- Reducing volume and rate of surface water runoff based on Local Plan policy and LLFA Guidance
- Locating development to areas with lower flood risk
- Creating space for flooding.
- Integrating green infrastructure into mitigation measures for surface water runoff from potential development and consider using Flood Zones 2 and 3 as public open space.

Maybe TWBC should listen to the advice they paid for?

The JBA report 2016s4793 - Tunbridge Wells Level 1 & Level 2 combined SFRA (v4 July 2019) suggested: under summary p161

- Floodplain restoration or augmentation represents the most sustainable form of strategic flood risk solution by allowing watercourses to return to a more naturalised state. This may involve measures such as

* return existing and future brownfield sites that are adjacent to watercourses back to floodplain, rather than allowing new development . This is the most sensible thing I have read in connection with Paddock Wood.

TWBC believe they can build on these sites and provide 'betterment 'at these sites-like the homes will only flood to 100mm not 500mm? TWBC are willing to spend £12 Million of public and developer funding to do so.

NPPF 155 states that , 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime(this is deemed to be 100 years-026 Ref ID:7-026-20140306) without increasing flood risk elsewhere. This development is unsound -See Appendix D NPPF 156.states that, Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards. TWBC have chosen to build on flood plain as their strategic policy. They certainly are not taking JBA advice and analysing their own data. This policy is therefore unsound.

(TWBC Comment - map C included within the comments has been appended to this comment)

The map above shows the flood zones for Paddock Wood for 2080. The redlines show a rough guide to the area under consideration. These sites are considered as a potential Local Plan allocation.

The NPPF specifically states 160a) the development should provide wider sustainability benefits to the community that outweigh the flood risk -and too this end TWBC say that there will be betterment of the area by flood mitigation with SUD's- this is in the area where there is no mains drainage and it

is not possible to implement because of the heavy clay and vast amount of water in this area. It is utter nonsense to believe TWBC can improve the flood risk in this area. There is no future proof for these sites either 160b) these developments will not be safe for a lifetime and the more houses they build here the more chance of increasing the flood risk elsewhere. This is poor planning unsustainable and unsound. The map above shows TWBC own map for climate change in Paddock Wood Appendix D and the site overlaid with STR/SS 1 Paddock Wood and East Capel Strategic policy. Overlays in red show the Proposed parcels of land earmarked for development. ((Eastern parcel not fully drawn.) There is something wrong with a Local Planning Policy when you have to trawl through wonderful sounding aspirations and justifications when actually the truth is very damaging and has far wider implications for the communities both within TWB Paddock Wood and Tudeley and surrounding boroughs TMB and Maidstone. I find these proposals very disturbing, poorly thought out, very wrong unsound and unjustifiable.

NPPF 157 All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations (NPPF 157 d). Well looking at Appendix DI think TWBC should be planning to build elsewhere.

TWBC will however complete Sequential and Exceptional tests. These tests- Sequential and Exception Tests will be used to show it is safe to build at Paddock Wood and Capel Parish, but this test is supposed to be used to steer new development to areas with the lowest probability of flooding i.e. Flood Zone 1 and the Exception test is to be used as set out in paragraph 102 of the NPPF, is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Well there are 513 sites-74 sites = 439 other sites and NONE of these are considered a more suitable sites?. There are other safer sites than Paddock Wood. Five Oak Green and Tudeley.

The real TEST- will be- will there be people to BUY these houses....I would never buy a house in Paddock Wood or Five Oak Green-there is a huge flooding issue and no amount of :Strategic Storage, flood defences, Increased channel conveyance, new channels, raising level of occupied floors of buildings above ground level- would induce me to buy a home in either of these places. I think it is wrong to expect others to do so. Hopefully builders will realize this too and market forces will prevail-they will have the sense **not to build homes they cannot sell- even if there is no common sense at TWBC. Building at Paddock Wood goes against NPPF guidelines and should not be allowed in such large nos.**

All homes should be raised well above the ground- which would make these homes expensive for builders to build and potential homeowners to buy. This will not fulfil the requirement for affordable housing at Paddock Wood.

I have also read in reports that the ground water system is acknowledged not to be fully understood especially when linked to climate change scenarios and I know Five Oak Green has this issue-as milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible. Current understanding of the risks posed by groundwater flooding is limited and mapping of flood risk from groundwater sources is in its infancy SFRA p37

Still it is believed ASGW that for example, more than 75% of the area within the 1km grid squares surrounding the Whetsted and Tudeley Hale as well as the area north of Five Oak Green are susceptible to groundwater flooding'

Paragraph 102 of the NPPF, sets out a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Again, why chose so many sites fraught with major difficulties that will only exacerbate over the decades and cause misery to families and TWBC are planning this? There are other sites.

It is unsound to build on these flood zones, especially in Paddock Wood where safeguarding land is likely to be required for current or future flood plain management. NPPF 157 b) TWBC are not doing this and as such the plan has not been positively prepared.

Question 6

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The development at Paddock Wood should be restricted to a maximum of 1000 to 1.500 homes and should all be raised well above ground level. Homes should be built in smaller groups on well researched plots that will be future proof. All homes should be built on mains drains. And all other developments linked into these drains as well. Conclusion: This area is unable to support a large number of homes and the total number should be reduced and future proofed.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Stephen Roberts [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Stephen Roberts [REDACTED]
Comment ID	PSLP_127
Response Date	07/05/21 15:37
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr Stephen Roberts
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Pre-Submission Local Plan S19	
Inset Map 07/08/09	
Question 4	
Do you consider that the Local Plan:	

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not positively prepared
	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

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this is a story of greed and expediency where the rules set out by government have been paid lip service to and our elected representatives have been deaf to criticism of their approach preferring, instead, to take a self-congratulatory and dismissive approach to the valid and sustained criticism of this ill-conceived and inadequately researched plan.

Before I set out my objections to the plan; I would like to show it is possible to be constructive and fair in respect to housing planning, locally and nationally – I will also set out where the current national guidance does not appear to take account of the factual nexus relating to population density in the country at large and conclude by questioning whether the amount of housing suggested is required at all, albeit that there is a general acceptance that old housing stock needs modernising or replacing and that the quality and types of housing stock need to be both environmentally friendly and suitably diverse to meet the entire populations housing needs; in this regard a particular emphasis is placed on affordable housing for first time buyers and for key workers, particularly in cities.

Assuming momentarily that the amount of house building that TWBC claim is required, is actually required (and this is disputed) the fairest way to deliver that housing would be by a distribution across the borough – quite simply if a thousand houses are required, place a matrix / grid of parcels of land across the borough (county / country etc) to create a meaningful relationship between the number of houses required and the grid such that in this example 10 houses are built in each parcel of land across the borough – i.e. 10 houses in each of 100 locations; the benefit of this mechanism at this scale would be infrastructural – it is highly unlikely that significant infrastructural changes would need to be made to accommodate this approach particularly as Save Capel will demonstrate that the amount of building TWBC intends, is significantly higher than it is required to build – Their current proposals have over 90% of the building load concentrated on less than 5% percent of the borough, which is both unfair as a matter of principle (before environmental factors are brought into the equation) and introduce a staggering requirement for infrastructure in a rural community which they have absolutely no intention of completing or funding and for which they have a very poor track record in any event. They have failed to hold builders, nor companies to account for promises made ahead of building / mineral extraction etc and the local ecosystems and population put up with the rotten consequences.

I point out at this juncture that the South East of England remains amongst some of the most populated areas in the world and the national statistic, that approximately a 3rd of the UK population live in a 9th of the UK geographic area in the South East of England continues to require to be addressed on a

national basis – if we are truly committed to a redistribution of economic wealth and investment; housing growth should be concentrated in the North of the UK and the Government should continue to address the infrastructural and social needs of the North, in its broader planning and building policy - Again on the fair is fair principle, simply building more in the South, presumably because that's where the current better profit is likely to be garnered, does nothing to address the economic or population imbalance already in play

The choice of Capel / Tudeley as a site for building is ill-conceived other than on the two basis which TMBC appear to have placed before all other considerations, where their consideration has no bearing on the practicability of the proposal, or its legality – they have a willing seller of the land (selling out his parent's heritage and commitment to the countryside and the green belt by the by) and almost all of the chaos and destruction this proposal will cause will fall upon Tonbridge and Malling, because the proposal abuts and feeds all of its traffic, pollution and waste out onto TMBC's shoulders (without the courtesy of involving TMBC in the proposal or thinking through its monstrous consequences) – the proposal is on farm and recreational land in the green belt; it is a flood plain, it has no sustainable infrastructure, no prospect of additional train station or links / is bifurcated by the existing main line, is not fully assimilated into national gas and water supplies has 1 b class road already chocked by traffic when the local primary schools are in season and risks an urban sprawl between Tonbridge and Paddock Wood resisted by sensible town planners for over 100 years. TWBC councillors take the added benefit in foisting this plan on Tudeley and Capel into their political rationale; by having all of this messy business imposed on just 900 residents, their electorate is left "unscathed" and they can wash their hands of us; we will never have the democratic weight of numbers to upset them - fortunately for us; the decision is actually not theirs to make and we are determined to demonstrate to you through expert evidence how seriously TWBC have derogated their responsibility.

The data used to present the scheme is out of date and wrong, the area chosen to execute the plan, unsuitable in multiple ways, particularly in relation to environment, protection of trees and reducing the climate change effect of development, building in the green belt, creating urban sprawl and building in the flood plain with the deleterious effect on standing and historical property and in the face of the rules in place and government advice in respect of town and country planning with the cost and effort to properly expose the folly of the plan falling disproportionately on the tiny community slated to be ruined, along with the greenbelt and the history of Capel and Tudeley.

TMBC have the slogan Love where you live; we do - they do not; the councillors and planners have chosen to take an undemocratic and disproportionate approach to solve a "problem" which they don't have (if they applied themselves properly to the data and requirements of the National building plan). Rather than representing their constituents, listening to their consciences, acting fairly and democratically, and applying themselves to defend the environment, whilst sympathetically working with the wider Borough and more broadly in the country as a whole to develop a sustainable housing policy, they have chosen to propose the destruction of the green belt by falling in with a single land owner to deliver a panacea to their perceived needs without care, consideration or application of the rules by which they are bound and having dismissed the concerns of their constituents and neighbours. The process has been a sham and a disgrace. Hundreds of thousands of pounds which should have gone in to providing the ecologically sustainable and shared responsibility for housing in the Borough will now be wasted in responding and defeating this shameful plan but with the responsibility falling on the tiny minority of Tudeley and Capel, upon whom this shameful plan has been imposed.

We have been ignored; there is 97 percent opposition to the plan; in the only Council meeting where we could put our views our elected representative listened to 30 minutes of self-congratulatory claptrap and was cut off mid-sentence after 6 minutes setting out our objections. Due process has not been followed; our experts will in due course demonstrate all of the failings and folly of the TWBC in proposing the plan and in your properly independent and objective review we anticipate, with great relief, your finding that the plan is ill-conceived, flouts the rules and intentions of the national policy and will not stand.

I choose my words carefully here but for effect; TWBC has decided to make Tudeley and Capel, an area of absolutely outstanding beauty and natural simplicity the anus of the Borough. Their intention is to defecate traffic, pollution, noise, transport and infrastructural cost into Tonbridge whilst retaining rent and rates from this obscene, dystopian building project for TWBC. In the process they will rip up 700 - 1000 acres of countryside. One of the councillors solutions to this (from their own re-election campaign literature) in their own words is to plant trees to replace those DESTROYED in the building

plan... How about devising a plan across the Borough that utilises existing brownfield and urban development sites that doesn't DESTROY trees in the first place?

The final ignominy is that Tudeley, a village with a grade one listed church looking out over the Kent countryside as it has for the last 700 years, and listed and photographed as one of the best 1000 sites in the entire country, will be renamed (misnamed) Tudeley Village, if this effluent plan is allowed, where the Church, with its world renowned Chagall windows will stand, for its entire future, surrounded by houses within a mechanised sprawl, combining Tonbridge, Capel and Paddock Wood in a desecration of the natural and sustainable separation between them.

TWBC are suggesting a simply enormous building and (un-costed) infrastructural project in the green belt which will last a staggering 19 years - that's four times longer than it took to build the Shard and three times longer than it took to build the Channel Tunnel- how can this POSSIBLY BE FAIR? Are TWBC completely mad? Perhaps not -

In a council meeting one of the counsellors who proposed this plan said that it should be voted through because they would all be dead before it was finished – it just about sums it up; no care, no consideration for the devastation and loss of our beautiful parish for future generations, just a current problem solved by people who don't care a jot about the havoc they are about to create and the destruction they will visit on our national heritage. Shame on them.

Question 6

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Please refer to the submissions of Save Capel regarding the errors and necessary modifications to make the plan sound. It is not compliant on any sensible planning measure relating to the Green Belt and the current Government's commitment to controlling and reducing greenhouse emissions. Protecting the green belt and halting climate change.

the fairest way to deliver necessary housing would be by a distribution across the borough – quite simply if a thousand houses are required, place a matrix / grid of parcels of land across the borough (county / country etc) to create a meaningful relationship between the number of houses required and the grid such that in this example 10 houses are built in each parcel of land across the borough – i.e. 10 houses in each of 100 locations; the benefit of this mechanism at this scale would be infrastructural – it is highly unlikely that significant infrastructural changes would need to be made to accommodate this approach. The current proposals have over 90% of the building load concentrated on less than 5% percent of the borough, which is both unfair as a matter of principle (before environmental factors are brought into the equation) and introduce a staggering requirement for infrastructure in a rural community where TWBC have absolutely no intention of completing or funding them

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The sustainability appraisal is an abomination – having misinterpreted and misapplied the housing need the preference for the Garden Village approach has been shoehorned into the sustainability assessment - this is a slipshod and wicked approach to the intention behind sustainable development - remember the issues arising from the plan are the desecration of 1000 acres of green belt derived from TWBC failing to sensibly assess urban and brownfield development and overstating the housing need; then buddying up to the landowner to ensure income for TWBC with all of the devastating effects being rested on a small community and on TMBC due to the proposed positioning of the scheme. There is nothing whatsoever sustainable about this plan – they have backed the sustainability argument into the plan not planned to be sustainable - this is a shameful derogation of responsibility

Comment

Consultee	Charles and Fiona Rosenmeyer [REDACTED]
Email Address	[REDACTED]
Address	- Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Charles and Fiona Rosenmeyer [REDACTED]
Comment ID	PSLP_1655
Response Date	03/06/21 18:53
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.8
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Charles & Fiona Rosenmeyer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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My wife and I have read the pre submission local plan for Tunbridge Wells.

While some changes have been made which we support, such as the removal from the plan of the secondary school at the junction of the A26 with the B2017, many of the original draft proposals which most troubled us, as Tonbridge residents, still remain. We therefore repeat our original comments on and objections to the draft plan as comments on and objections to the pre submission plan. Those comments and objections were set out in an email dated 5th November 2019, which is copied below (TWBC: 2019 Regulation 18 comments duplicated below for ease of reference)

The proposal to add 3,500 dwellings to Paddock Wood and 2,800 to Tudeley would lead to considerable increased pressure on already overloaded roads which serve Tonbridge and would change the rural nature of the area for ever. We acknowledge that there are proposals to improve the Woodsgate cross roads and create by-passes for Five Oak Green and Colts Hill, but there is no indication when these may be built. Even if they are built, they will only tend to ameliorate traffic driving east/west to and from the A21 and Tunbridge Wells. They will do nothing to help alleviate congestion on the north/south routes to and from Tonbridge. As the proposed developments would be much closer to Tonbridge than Tunbridge Wells, and as much of the additional commuter and shopping traffic generated would be more likely to travel to Tonbridge than Tunbridge Wells, the developments would have a significant adverse impact on Tonbridge even if there were improvements to the north/south routes, as yet not proposed.

No development of any form, even on a small scale, should take place in Paddock Wood or Tudeley, unless the Woodsgate improvements are made and unless the Five Oak Green and Colts Hill by-passes are constructed in a way which takes traffic away from Tonbridge and towards the A21 and Tunbridge Wells.

We also see that there is a proposal to close Hartlake Road between Golden Green and Tudeley. This road, which forms an informal by-pass to Tonbridge and lies close to the local authority border with Tonbridge, is far more relevant to Tonbridge than Tunbridge Wells. During the morning rush hour the A26 is regularly at a standstill in north Tonbridge. As a result Hartlake Road is regularly used by north Tonbridge residents and those of the settlements around north Tonbridge, including Golden Green, to gain access to and from the A21. If Hartlake Road were closed it would make the A26 even more congested. No steps should be taken to close Hartlake Road until an overall highways solution is found for the A26 to bypass north Tonbridge and for improved access to the A21 to be provided.

There are many places within the boundaries of Tunbridge Wells borough where if houses must be built and all brown land sites have been used, poor quality green belt could be surrendered for the purpose. In our view, to use flood plain land with poor access and poor services on Tonbridge's doorstep is to try to transfer some of Tunbridge Wells's problems to Tonbridge. An analogy would exist if Wealden District Council were to try to build 6,000 houses and support developments adjacent to the Ramslye estate.

(TWBC - Regulation 18 comments dated 5th November 2019)

Tunbridge Wells draft local plan We have read the draft plan, particularly as to its possible effect on Tonbridge, where we live. We have also read the submission to your council by Tom Tugendhat MP. We wish to support his comments and those of Tonbridge and Malling District Council about the proposals in the plan in so far as they affect Tonbridge. We also wish to make the following additional comments about the proposals for Tudeley/Capel, Paddock Wood, Woodgate Way and Mabledon, all of which are on Tonbridge's doorstep.

Generally There is a considerable lack of information in the draft or in reports appended to it showing the likely effect on Tonbridge of the proposals, why Tonbridge should be expected to accept that effect and who, other than the council tax payers of Tonbridge, will pay for the costs of ameliorating it.

Green belt Whilst the draft mentions the green belt, in relation to Mabledon and Tudeley/Capel it must be remembered that what is proposed is not building in the green belt protecting Tunbridge Wells but in the green belt protecting Tonbridge. So the case needs to be made for invading that green space which will have little effect on Tunbridge Wells (other to help it hit its targets) but will have a major effect on Tonbridge, which is not even asking for the development.

Roads and road transport 1. Tonbridge has only one major rail crossing and one major river crossing in the town. That leads to regular congestion, particularly at the start and end of the working day and in the afternoons when the schools break up. Any new development in the neighbourhood of Tonbridge will have an effect on bus services, parking and the emission of CO2 and other harmful substances. It is not sufficient to state, as does the draft, that these issues should be considered as part of a detailed planning application; Tonbridge, which has not asked for these proposals but will be affected far more by them than Tunbridge Wells, should have access to data and reports now while the plan is still a draft and not later when it will be claimed as a fait accompli. 2. In the same way, Tonbridge should be told now what alterations to local roads are proposed. The roads around Tudeley are local, narrow, winding, prone to flooding, dangerous in places and already overused. The principal road from Paddock Wood to Tunbridge Wells already needs considerable improvement, not least a by-pass to Colts Hill; no such improvements are proposed by the relevant highway authority. If Paddock Wood is doubled in size as is proposed, major improvements will also be required to the principal route between the town and Tonbridge. 3. New housing will generate additional private car journeys and delivery journeys. It would be facile to suggest that most food shoppers from any development at Tudeley/Capel would carry out their major food shop anywhere other than Tonbridge. It is also facile to suggest as the draft implies that commuters from Tudeley/Capel would drive to Paddock Wood to board a train for London. To do so would increase their overall travel times and increase the cost of their train tickets. 4. A new school at Woodgate Way would also increase car traffic not least as there is no obvious way other than the private car by which teachers and pupils can reach the site. There is no principal bus route, no cycle lane and it is too far to walk (and dangerous to do so) either from Tudeley or Tonbridge. 5. As people shop increasingly on-line, there should be a study on the additional road miles in the vicinity of Tonbridge, which will be generated by these proposals. For instance, it is likely that many food deliveries ordered on-line will be delivered from Tonbridge. Also Royal Mail post for the area, initially delivered to Strood, is driven by articulated lorries into Tonbridge via the A26 for local sorting in the Royal Mail facility in Tonbridge. Deliveries from there to Paddock Wood and Tudeley and collections in reverse are bound to add materially to the use of the surrounding roads.

Train travel The plan does not say whether the rail transport authorities would support or fund a new station at Tudeley. The line between Tonbridge and Paddock Wood is already congested at peak times. Those commuting from Tonbridge should be informed now what effect the draft proposals would be likely to have on frequency of services, availability of seats, choice of destinations and what rail improvements are required, who will fund them and when they will be carried out.

Flood defences A material part of the proposed Tudeley/Capel development area lies on the Medway flood plain at a height above sea level of only 50 feet or less. Even though the remainder of the site rises gently above that level, much of it has flooded in the past and the proposals for further defences at Leigh have yet to be carried out. Even if they are, an assessment should be made now of the likelihood/risk of future flooding on the site given climate change, the slow sinking of the landmass and the rising of sea levels.

Schools and healthcare The draft makes a proposal for a new secondary school but says little about the need for additional infant and junior schools and additional doctor's surgeries and supporting medical services the need for which will be generated by the additional housing proposed. As the likely effect will be disproportionally laid at Tonbridge's door, there should be studies now in support of the draft realistically to measure that effect rather than later when a new local plan has been adopted.

Services It is not good enough to say, as does the draft, that these are issues to be considered in the future when the plan has been adopted. As the supply of services may affect Tonbridge, Tonbridge residents should be told now what that effect will be. For instance; Gas; will the supply come from Tonbridge, what route will it take, and what impact will it have on local supplies?

Sewage; where will the sewage be treated, by what route will the sewer pipes take it there, will it be pumped, will it have to cross the railway and the Medway and what effect will it have on the already stretched treatment plant in Tonbridge?

Electricity; what additional generating capacity will be required, where will it be sourced, what renewable capacity will be generated on site and what if any additional high tension supplies will need to be brought in?

Internet and mobile 'phones; what if any disruption to internet availability in Tonbridge will be needed to supply services to the proposed new development? Mobile coverage is already patchy in the area. What binding proposals will there be to ensure adequate coverage?

The draft should deal with all these issues before it goes for consideration by the planning inspector or the minister so that the residents and taxpayers of Tonbridge may have a full understanding of the proposals, which are likely to affect them far more than the inhabitants of Tunbridge Wells.

As Tonbridge residents we feel that the draft reveals that the Tunbridge Wells Council, concerned about development in its own back yard, has cynically decided to place that development in Tonbridge's back yard, with Tonbridge being expected to pick up many of the ancillary costs, financial, social and environmental.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_3

Comment

Consultee	David Rowlands [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Rowlands [REDACTED]
Comment ID	PSLP_83
Response Date	04/05/21 16:25
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Planning refusal 1801767.pdf (1)
Question 1	
Respondent's Name and/or Organisation	David Rowlands
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a retired resident of Tonbridge and have lived here for 45 years, I worked in the town for over 20 years and now a regular walker in the area and an active member in the community.

Please add my contact details to your consultation database so that I can be kept informed of all future consultations on Planning Policy documents. I understand that my comments will be published by the Borough Council, including on its website.

I am writing to object to

The Strategy for Paddock Wood" (Policy STR/SS 1).

Your plan to create a garden settlement of at 2,800+ at Tudeley and 4,000 at Paddock Wood will cause nothing but harm to the local community, environment and wellbeing of the residents of the Parishes of Capel, Paddock Wood and the residents of Tonbridge. The only benefits are to **TWBC** through receiving the council tax of these new dwellings and that it solves 60% of what we believe is their incorrect housing targets with one Vendor without them having to investigate their local brown field sites and other smaller sites within Tunbridge Wells and that they would happily use 600 acres of our green belt.

- 1 My objections are as follows: - (Please note you have already rejected planned building in this area for building only 6 B&B rooms)
- 2 **GREEN BELT:** - Losing 600 acres of Green belt and creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife, clean air, and This area should remain rural with agricultural land that can be used to provide food. And to quote from Rejected building application 31st July 2018 **REFERENCE: 18/01767/FULL**.

The proposal would constitute **inappropriate development within the Metropolitan Green Belt**, which by definition is harmful to its openness. There is **insufficient evidence** of the necessary 'very special circumstances' **to overcome this harm**. The proposal is thus contrary to **Policy MGB1** of the Tunbridge Wells Borough Local Plan 2006, Core Policy 2 of the Tunbridge Wells Borough Core Strategy 2010, and the National Planning Policy Framework 2018. The proposal, by virtue of creating new buildings with associated domestic paraphernalia, works to alter the land levels and potential additional impacts from further parking and works in close proximity to the trees at the rear would have more than a minimal impact on the landscape character of the locality. It would not conserve and enhance the rural landscape, nor would it protect the countryside for its own sake, nor preserve the interrelationship between the natural and built features of the landscape. The overall impact is harmful to the rural character of the area. It would thus be contrary to saved **Policies LBD1, EN1 and EN25** of the Tunbridge Wells Borough Local Plan 2006, Core Policies 4, 5, and 14 of the Tunbridge Wells Borough Core Strategy Development Plan Document 2010, the National Planning Policy Framework 2018 and the Planning Practice Guidance.

- 1 **FLOODING:** - Note the danger of Flooding and threat to life as highlighted in rejected planning (quote from Rejected building application 31st July 2018 **REFERENCE: 18/01767/FULL**). It has not been demonstrated that the occupiers of the development would not be at risk from flooding or that the development would not increase flood risk elsewhere. Therefore, the development is likely to result in a risk to human life from flooding and is contrary to policies EN18 of the Tunbridge Wells Borough Local Plan 2006 and Core Policy 5 of the Tunbridge Wells Borough Core Strategy 2010, guidance in the National Planning Policy Framework 2018 and the Planning Practice Guidance
- 2 **TRAFFIC:** - Increase in traffic in the region of 5000 vehicles on already congested roads in particular B2017 that will cause extreme high levels of Carbon dioxide (CO2) near at least 6 local schools queuing at current road junctions and roundabouts. The Office for National Statistics: - Household Labour Force Survey shows that: Percentage of households by combined economic status, April to June 2019 that 60% of households have both residents working which means at least one will use a car and 26% have one family member working which again no doubt will be using a car. I will be interested to see how you as stated achieve “ Zero and low carbon energy production to be considered during early design stages”
- 3 **INFRASTRUCTURE:** - Unacceptable increase of pressure and stress on local Tonbridge Doctors, Schools, Buses, Roads, and Parking, Tonbridge will become this garden settlement's town of choice as its much closer than Tunbridge Wells.
- 4 **TRAINS:** - Unacceptable increase of commuters on already overcrowded trains at Tonbridge with no room for any increase in carriages due to length of platforms.
- 5 **PARKING:** - Insufficient parking in and around Tonbridge now.
- 6 **SCHOOL:** - The proposed new senior school will draw children in from all of West Kent. It is a 40-minute walk from the over busy station of Tonbridge. And the plan has a railway line at the back of the school grounds.
- 7 **HERITAGE:** - Damage to environment around a very important prized heritage site – All Saints Church at Tudeley, with its world renowned stained unique stained-glass windows.
- 8 **Community:** - This plan will divide the communities of Capel, Tudeley, Paddock Wood, and Tonbridge who will pay the price for this disastrous planning application that threatens the wellbeing of all of these communities.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

If you would like to attach a file in support of your comments, please upload it here. [Planning refusal 1801767.pdf \(1\)](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nigel Sales ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Nigel Sales ([REDACTED])
Comment ID	PSLP_1999
Response Date	04/06/21 15:24
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Nigel Sales
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Could I please start by saying that there are many thousands of people in and around Paddock Wood that find representations against the local plan a very daunting prospect. My initial thoughts when I started to try to make my feelings known were to just give up and hope someone else managed to echo my thoughts. I wonder if this was something that was 'by design'. I'm now going to hopefully get my feelings across in another way.

I've been a resident of Paddock Wood for almost twenty five years and have strong family connections to the area way before that. I have seen many changes in the town including the change from a village to a town which seems a very long time ago now and at the time I saw it as a natural transition as the village grew in numbers. I didn't think the new Town status was going to be the beginning of a process that saw our new 'Town' become a small part of an ever increasing urban sprawl that would see adjacent towns just blend into one another.

As we get older and wiser we realise the changes over the last twenty years have already started to harm our local environment and so the Draft Local Plan is now filling people of my age group (I'm 57) with dread as our local area developments get larger and more numerous. The current infrastructure is often realised to be left wanting and already it seems little or no provision is being made for the incredibly unfair proportion of housing developments that are being forced upon us. The drainage and flooding issues that we have so often encountered in recent years will only be made worse by the new developments on flood plains. Loss of trees and hedgerows is another major concern and as we have seen in the Church Farm development in Paddock Wood with the destruction of ancient oak trees without prior permission. The developers have no concerns regarding these actions and it seems TWBC turn a blind eye or maybe actually have less influence on these matters than the very powerful developers. We've heard the phrase so many times but money talks!

The other ongoing development on Badsell Road in Paddock Wood which has very unfairly adopted part of the name of Foalhurst Wood, has made misleading claims that it is creating a nature reserve. This is wholly untrue. The allocated land to separate their development from Foalhurst Wood is just the minimal amount of land that could be allocated to preserve the potential profits for the developers.

Next to consider who is going to live in these thousands of new homes? Local people? Local young people? Not a chance. The prohibitive prices of the homes in these developments will rule out local buyers. The Foalhurst Green site is actively marketing these homes in China to attract wealthy buyers in buy to let opportunities which seems to be wholly unacceptable.

The 'Plan' and all its new road and cycle way networks seems to be a pie in the sky look ahead to the way things could be and no thought has been given to solving problems that we already have. New schools, more health centre provision and law and order issues have been completely overlooked considering the huge increase in Paddock Wood's population.

Our neighbouring villages who also face losing their identities in this awful merging of developments also deserve consideration. We sit close to the boundaries of three boroughs, TWBorough Tonbridge and Malling and Maidstone. These other local plans seem to be as flawed as the TWBC plan? There is surely enough Brown Field sites to use before Green Belt land is considered? I feel this again is a decision that is driven by the developers potential for profit rather than what is best for the residents of the borough?

These are my major concerns. I hope someone takes the time to read this email which I wrote as an alternative to the incredibly complex process of complaint against the draft local plan?

Could I expect a reply? Probably a bit too much to ask? We need a local plan but not this one!

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Richard Sankey [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Sankey [REDACTED]
Comment ID	PSLP_2017
Response Date	04/06/21 14:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Richard Sankey
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel and

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Nos. 5.260-5.267 and Map 27

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I believe that this document is unnecessarily technical and is designed to make it difficult for ordinary citizens with strong views own this policy to express their views, tilting the balance in favour of those who can afford the best technical advice i.e. the developers, landowners and the council.

I am not a resident of TWBC but I live very close by in Tonbridge and Malling and regularly visit or pass through the area affected by this proposal. I object in the strongest terms possible to the proposal to build such a large number of new homes on a Greenfield site in and around Tudeley/Capel. Quite apart from the loss of an outstanding area of beauty from an amenity point of view, on what is in any case land prone to flooding, it will place an intolerable extra burden on surrounding roads and rail services. Pre-pandemic I commuted to London and expect to again from later this year. I know exactly how bad congestion on both roads and rail services are, particularly in term time given the large number of schools in the area.

I am all to aware that this is an easy solution for TWBC to meet their housing targets while dealing with just the one landowner who will add to his already significant wealth. It shows a complete lack of imagination on the part of the council who show little regard for the residents of Capel parish; their views and opposition to they scheme were clearly shown in the results of recent local elections.

I ask TWBC to go back to the drawing board and come up with more a far more sympathetic solution to their housing needs, in particular making far batter use of brownfield and urban locations which are slowly emptying of their retail occupants. I believe that this could account for much of the housing needed. It would be a dreadful shame to see much of the area lost to such a scheme which would have a dreadful effect on local residents and place such a burden on existing infrastructure.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question

5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No further comments.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

No further comments.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Matt Savage [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Matt Savage [REDACTED]
Comment ID	PSLP_1262
Response Date	04/06/21 14:55
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Matt Savage
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a local resident of many years. I was born in Pembury, grew up & educated in Tunbridge Wells, fortunate to have worked & travelled extensively around the world and have been living in Paddock Wood for the last 6 years. We chose Paddock Wood to live, like many residents did, because we do not want to live in a housing estate or large town and enjoy the village-like community atmosphere, along with being in a semi-rural location and the opportunity to experience the great countryside around the small town.

Currently, there are 3 developments in progress around Paddock Wood at Mascalls Grange, Badsell Road and Church Farm. Collectively, these developments are intended to deliver an additional 1,126 homes of various sizes, which is a considerable increase for the Paddock Wood area. It is estimated the number of residents will increase from 8,500 to 11,500 as a direct result of these current developments, an increase for the town of over 35%. To put that into context, it would be the equivalent of over 21,000 additional residents in Tunbridge Wells, with no additional town infrastructure being implemented.

In the 3 current development schemes, apart from a 'plan' to build a new school, I can find no supporting infrastructure plans for the town. For example, allowing for a conservative estimate of 1.5 cars per household, this equates to approx. 1,700 additional cars in the immediate town vicinity. However, I can find no plans in the information relating to these current developments to provide additional parking anywhere in the town itself, or improvements to the existing road infrastructure to support the considerable increase in traffic from these developments. It is also worth noting, no work has started on building the 'planned' new school to support the current developments, despite the residential properties being in construction, with many already sold and occupied. To quote the local MP, Greg Clarke, it must be "I before E" meaning Infrastructure before Expansion, but this is just not happening and the current town is expected to cope with a >35% population increase, which is not a sustainable approach to development in any way.

Much has been made of the "excellent transport links" in Paddock Wood, of which there are 2, roads & rail. However, there has been no development of infrastructure in these areas to support the current developments to meet the demands a >35% increase in residents.

Therefore, I have no confidence in TWBC (Tunbridge Wells Borough Council) delivering the required infrastructure to support such a dramatically large increase in population proposed in the Draft Local Plan, as TWBC have failed to achieve this with the existing developments taking place. The existing developments are not improving the town for existing or future residents and the approach taken by TWBC does not support any sustainability requirements, so it is very unlikely this will be different for developments proposed in the Draft Local Plan.

Rail

Prior to the Covid pandemic the official station car parks were full on most days of the week, with no spaces available. Much of the Draft Local Plan proposed developments are not in realistic walking distances of the station, especially in poor weather, so will result in more commuters in cars looking

for parking. The inevitable growth in commuter numbers will place an unacceptable burden of all day parking in nearby residential locations, as no additional parking is being made available to support this growth.

In addition, trains at peak times were at capacity, with less & less seating being available from and to Paddock Wood, with the inevitable growth in commuters to & from Paddock Wood station, what have TWBC done to ensure suitable availability of train seating given the substantial cost of a rail ticket to London at peak times? A TWBC Councillor involved in the Draft Local Plan has stated the Council 'hoped' rail operators would provide improved services. Delivering a Local Plan based on hope is not professional or sustainable in any way.

The TWBC Draft Local Plan would more than double the population of Paddock Wood to approximately 24,000 from the current population of approximately 8,500. There are no details in the Local Plan to account for how the rail service will accommodate the resultant huge increase in passenger numbers, or the realistic proposition of recognising there will be a corresponding & significant increase in traffic and demand for parking in relation to the train service. The Draft Local Plan seems to assume all new residents will either walk, cycle or use public transport to get to the station. This is just not realistic and a quick look around the current development at Mascalls Grange, where new residents have started to move in, will show the average new household has at least 2 cars.

Roads

Anyone who has travelled in and out of Paddock Wood on the existing road network at peak hours can attest to the traffic jams at all the main road connections. In addition, the significant traffic issues currently experienced trying to enter Tunbridge Wells from the Paddock Wood direction at peak times, with long & dangerous delays on Pembury Road, the A21 junctions and through the North Farm industrial estate will only get worse. The current 3 developments are already putting more load onto the existing overloaded road network, resulting in increased traffic on local rural routes around the town with people trying to avoid the traffic, putting local residents at risk of injury or death by increasing the likelihood of accidents and injuries as the 'short cut' mentality rises.

With the additional 12,000 residents proposed by the Local Plan and allowing for approximately 1 car per household, at least another 6,000 cars will be expecting to use the road systems around the town. Increasing traffic issues, raising the accident rates and damaging the environment & air quality for existing and new residents very likely leading to health issues. The current transport plans documented in the Draft Local Plan are wholly inadequate to be useful in addressing the real issues resulting from the disproportionately large developments proposed.

Given TWBC track record in not delivering any additional transport infrastructure to support the current developments in progress, I have no confidence any additional effective transport infrastructure will be built to support the substantial residential and commercial developments proposed in the Draft Local Plan, given that it will result in more than doubling the population of the town.

There is also a proposal to close the B2160 Maidstone Road railway bridge to private vehicles, effectively cutting off the north part of the town from the south. The knock-on effect on other roads and rural lanes as vehicles seek alternative routes will be disastrous, leading to an increased danger of injuries & putting lives at risk due to road collisions and compounding issues of congestion at the already busy junctions at both ends of Badsell Road and the surrounding roads.

Shopping

Paddock Wood currently has one small supermarket, which regularly has a crowded car park at peak times. The current developments taking place will only make this worse leading to dangerous traffic jams and blockages in the immediate vicinity.

The Draft Local Plan makes no consideration of where the large number of new residents will go to get their weekly groceries. However, it is very likely they will use cars to either drive in to the village or drive further afield to Tunbridge Wells, Tonbridge or Maidstone for larger stores. This will directly lead to more traffic in and around the village and air pollution.

Impact on residents

The current 3 developments are having significant impact on the town and local residents through greatly increased noise pollution and disruption, multiple road closures, along with significantly negative impacts on the environment & air quality. During wet weather, mud is regularly deposited on the surrounding roads and in dry weather the dust covers everything for many hundreds of metres from

the development sites. It would appear TWBC has absolutely no consideration for compounded impacts multiple developments across the town will have for many months, if not years.

The Draft Local Plan makes no mention of the impact large construction sites will have on the existing residents. Given the scale of development proposed in the Draft Local Plan, Paddock Wood will be surrounded by large construction sites for many years to come. It should be totally unacceptable for local residents to endure such disruption, pollution and severe detrimental impact to their way of life, very likely leading to health problems for many with dust and pollution from large construction for a prolonged period in such close proximity to existing homes.

Paddock Wood has become the 'soft target' for TWBC housing requirements when multiple alternative options are clearly more sustainable, less intrusive and certainly more equitable to all Borough residents. The Draft Local Plan places the overwhelming majority of the Boroughs new housing in one location, surrounding Paddock Wood, rather than the fair and equitable approach of 'sharing the load' across the Borough with multiple smaller developments spread around the Borough, reducing impacts on all fronts from disruption, pollution, air quality, the environment and flood risks.

The Draft Local Plan will result in surrounding Paddock Wood by developments for many years to come resulting in an imprisoned existing community in the middle of a housing estate. Many local residents, such as myself, chose Paddock Wood because we do not want to live in a housing estate and enjoy the village-like community atmosphere of the town, which will completely disappear under the TWBC Draft Local Plan. Given the proposed scale of development in the Draft Local Plan, Paddock Wood will become just an outlying suburb of Tunbridge Wells and completely lose its identity and local community atmosphere.

It is also worth noting Paddock Wood residents pay the highest amount of Council Tax of any Parish in the Borough. However, TWBC chooses to ignore the residents and Paddock Wood Town Council who have rejected the Draft Local Plan. Perhaps TWBC see a revenue opportunity in building as many properties as possible in Paddock Wood so they can charge the highest Council Tax to new residents as well.

Environment

As the Draft Local Plan recognises, Paddock Wood is within a flood plain area of low-lying land. It has experienced local flooding on many occasions over the last 6 years and more flooding can be expected in the future.

Advice from the Environment Agency is clear, Sir James Bevan its Chief Executive stated in a speech in February 2020 *"the clue is in the name: flood plain. So we can and should insist that development only happens there if there is no real alternative, that any such development doesn't increase other people's flood risk"*.

There are real alternatives available across the Borough to building in the low-lying flood plain area of Paddock Wood, therefore the Draft Local Plan as it currently stands goes against Environment Agency policy.

In addition, the UK Governments own website shows much of Paddock Wood currently resides in a medium flood risk area (<https://flood-warning-information.service.gov.uk/>).

With the increasing extreme weather which the vast majority of the scientific community advises will only get worse due to the climate crisis, the flooding risk for Paddock Wood and the surrounding flood plain area will continue to increase.

Sustainability

The following are taken from the Local Plan Sustainability Proposal in relation to the proposed development of Paddock Wood. For context, Option 4 is being proposed in the Draft Local Plan:

Air: "All options pose a high risk to deterioration of local air quality, with impacts worsening as the scale of the development option increases. Traffic would increase substantially"

Land Use: "Loss of greenfield land with Best and Most Versatile soils causes all options to be scored negatively for land use. However, options 2 and 4 are slightly worse as also include the release of Green Belt land with overall harm rating of High"

Landscape: "Landscape scores follow a similar pattern to heritage reflecting encroachment into the High Weald Character Area in the south. 2020 AONB setting report reinforces the more negative

scores for Options 3 and 4 which have potential to adversely affect the AONB by extended development further south"

Duty to Cooperate

There has been a negative reaction to the TWBC Local Plan in relation to the proposed significant developments around Paddock Wood from both the local Paddock Wood Town Council and neighbouring Borough councils. In addition, TWBC continues to ignore the feedback from local residents, with even the previous leader of the Council telling a member of a local residents' campaign group opposed to the current Draft Local Plan "you will never win". This clearly suggests TWBC has failed in regard to its Duty to Cooperate and intends to continue with the Draft Local Plan, irrespective of local residents, Town Councils and neighbouring Borough councils.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Draft Local Plan needs to be modified substantially to ensure a fair and equitable approach of 'sharing the load' across the Borough, with multiple smaller developments spread around the Borough, reducing impacts on all fronts from disruption, pollution, air quality, the environment and flood risks.

Following the advice of Sir James Bevan, Chief Executive, Environment Agency:

"the clue is in the name: flood plain. So we can and should insist that development only happens there if there is no real alternative, that any such development doesn't increase other people's flood risk".

The Draft Local Plan needs to propose the real alternatives available across the Borough to building in the low-lying flood plain area of Paddock Wood.

Moving to an approach of multiple, smaller developments across the Borough combined with the prioritisation of brownfield sites, of which there are many, will greatly reduce the current proposal to utilise greenfield locations and reduce the overall environmental impact of developments overall, at the same time greatly reducing the flood risk for existing and future residents.

Clearly multiple small developments are less attractive from a commercial perspective for developers, as building large developments in single locations is more cost-effective. However, maximising profit for developers should not be of concern to the Draft Local Plan and it must focus on what is in the best interests of the residents. Mass developments on flood plains are not in the interests of anyone.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_131a-c

Comment

Agent	Mr Simon Bell ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Knights Solicitors
Address	Regency House 25 High Street Tunbridge Wells TN1 1UT
Consultee	Save Capel ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Save Capel ([REDACTED])
Comment ID	PSLP_1980
Response Date	03/06/21 18:51
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-3_Appendices.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-1_Cover Letter.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-2_Representation.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Save Capel
Question 2	

Agent's Name and Organisation (if applicable) Knights Solicitors

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Paragrah No(s) 5.153-5.229

Policies Map (Inset Map No(s)) 26, 27, 28, 29

[TWBC: for further comments by Save Capel, please see Comment Numbers PSLP_1964 and PSLP_1973-1987]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see attached: "Representation by Save Capel under Regulation 19", dated 3rd June 2021, and Appendices

[TWBC: the following extract is from "Representation by Save Capel under Regulation 19" - for the full representation and appendices, please see supporting documents]

STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

4.1. Save Capel submits that this Policy, and the substantial contribution of this allocation to the overall Growth Strategy, is **unsound in its present form** for the following reasons;

It is **not positively prepared** because;

- . Its OAN has been based on out-of-date statistical data and has failed to reflect the Borough's constraints of green belt and flood zones in establishing its planned need.
- . Exceptional circumstances exist in the Borough which would allow a departure from the 'standard method'.
- . TWBC did not fully engage with other LPAs, including those outside the HMA with less constraints, to establish whether they could take any 'unmet need'.
- . It has not considered truly local needs and is not 'objectively assessed'.
- . The consultation process was inadequate and deeply flawed.
- . It has disregarded local public opinion expressed in responses at Regulation 18 and the 'Vision for Capel' questionnaire in the preparation of the Capel Neighbourhood Plan, which has direct bearing on the siting of new housing.
- . The Plan has not considered the cumulative impact with the local plans of neighbouring LPAs, particularly on transport & infrastructure.

It is **not justified** because;

- . A revised OAN target using the latest government statistics would result in a lower OAN and thus, less pressure on the Plan to consider development on constrained areas.
- . 'Windfall sites' are understated which has not reflected the recent changes in legislation that promotes the change of use of urban sites to residential. The strategy ignored sites with less than 10 units which should have been considered for allocation.
- . It has failed to rigorously identify all other brownfield opportunities, including those resulting from the changing need for office/retail space. In particular, post-covid.
- . The review of town centre regeneration (scheduled for around 2025) should be reflected in the growth strategy needs now.
- . It is not demonstrated that development at East Capel is the most appropriate strategy and reasonable alternatives have not been considered fully before developing this green belt.
- . The Sustainability Appraisal for East Capel is flawed and has not been evidenced by an assessment at the 62 sub-question level.
- . It fails to acknowledge the cumulative effect of increased transport from housing and adjacent quarry development in a balanced way. It ignores key evidence of traffic safety impacts associated with HGVs using inadequate local roads, most of which are narrow country lanes, and fails to acknowledge the issue of pollution associated with increased vehicular traffic including HGVs.

It is **not effective** because;

- . It is not evidenced by a statement of common ground with neighbouring TMBC.
- . It is relying heavily on two strategic sites (including this allocation) in unsustainable locations for delivery of its housing target which represents an unacceptable risk for the borough.
- . This allocation is proposed to deliver 300 units per annum by 2025/2026 which is optimistic and affects the 5-year supply requirement.
- . It relies entirely on the deliverability of substantial infrastructure where the evidence base documents are inconsistent, contradictory and unrealistically optimistic.
- . The evidence does not support the extent of infrastructure interventions required to deliver sustainable development and the Infrastructure Plan does not effectively mitigate the impacts of the STR/SS 1 development and/or is commercially unviable.
- . There is no demonstrated commitment to "I" Before "E" with key community and transport infrastructure being 'medium or long-term' and a reliance on s106 funding.

It is **not consistent with the NPPF**, specifically in respect of the nature of the East Capel site and its planned development;

- . Exceptional circumstances exist in the Borough which would allow a departure from the 'standard method'. This could avoid development on this green belt.
- . The evidence presented does not support the conclusion that the site 'on balance' meets Sustainability criteria (i.e., on social, environmental and economic grounds).
- . There are "severe" traffic impacts, which have not been adequately mitigated, and the impacts of which will be social (access to services), environmental (such as road safety and air pollution), and economic (congestion will cause delays, with economic cost). The Plan does not meet the tests set out in the NPPF (para 109) and is undeliverable.

- . It has not been prepared following the guiding principle in NPPF that ‘... local people ... can produce their own [local] plans which reflects the needs and priorities of their communities.’
- . Green Belt boundaries should only be altered in ‘*exceptional circumstances*’ which are ‘*fully evidenced*’ (NPPF para 136). These proposals do not meet these requirements.
- . The allocated development will have considerable and harmful cumulative effects, including the setting of adjacent AONB, and is inappropriate in scale and extent.
- . The Plan has failed to adequately assess the impact on heritage assets and their setting.
- . It does not demonstrate that the development will any way manage, conserve nor enhance biodiversity.
- . The plan does not demonstrate that the proposed development will provide wider sustainable benefits that outweigh flood risk, nor that it will be “safe for its lifetime”.
- . TWBC has not demonstrated how the proposed flood mitigation measures will ensure that the development will not cause flooding to existing properties.

4.2. Whilst the level of detailed evidence required to support an allocation in the local plan is not the same as for the subsequent SPDs and a planning application, Save Capel submits that compliance with all regulations (including the NPPF) and all evidence should be tested at the Inspection stage. We strongly argue that the failure to meet any of the above would inevitably result in sufficient harm which would mean that any subsequent planning application for the site would necessarily be refused.

4.3. These arguments are explained further under the following topic areas.

Consistency with other policies

4.4. This representation acknowledges the objectives of TWBC and supports many of the policies set out in the PSLP. However, the allocation at East Capel (STR/SS 1) directly contradicts several other policies and is inconsistent with much of the evidence base.

Policy EN4 - Historic Environment

4.5. This Policy uses terms such as “have regard, where possible, consideration” words that do not convey any surety that the Policy will safeguard our unique historic environment despite acknowledging that it is an irreplaceable asset. The sheer scale of the change of setting from rural to urban in Capel with 4000+ houses does not show “sensitivity”.

Policy EN5 - Heritage Assets

4.6. It is to be hoped that TWBC abide by this policy and recognise the significant harm that the LP as it stands will cause. Housing need alone cannot be used as any justification. Given the scale of the proposals the setting of many assets will be significantly harmed.

Policy EN8 - Outdoor Lighting and Dark Skies

4.7. Light pollution is one of the most rapidly increasing types of environmental degradation. Light pollution maps enable the tracking of changes in light pollution across the country. Lights can account for between 15-30% of a council’s carbon emissions.

4.8. With few exceptions, everything we build is lit at night, including homes, streets and roads, bridges, commercial buildings, parking lots, etc. Sky glow, glare and light spillage can disrupt the behaviour of flora and fauna. Year on year, artificial lighting is increasing by about 6%.

4.9. This increase will exacerbate known and possible unknown effects of light pollution on human health, environment and on the visual perception of the Universe by humans due to the location, intensity, and wavelength of the emitted light at night.

4.10. TWBC’s strategy EN8 is to “maintain current level of lighting in rural areas.” The target is “no deterioration in dark skies mapping outside allocated areas.” The implication of this is that lighting levels will not be reduced with the new development, so the density of lighting could remain the same per area of construction, but as the area grows, it could spread the light pollution more widely.

4.11. Light pollution will be an insurmountable issue which will affect not only residents of the development but wildlife and biodiversity assets currently thriving. If this is proposed to be mitigated by reducing lighting density throughout the settlement, this would no doubt lead to more crime as has been the case in other “Garden Settlements”.

Policy EN18 - Rural Landscape

4.12. Several “roads” within Capel are included in the “Rural Lanes” Supplementary Planning Document.

4.13. It is unclear and no evidence produced how this Policy relates or supports in any way the Strategic Sites Policies. The plans WILL result in unsympathetic change to important rural lanes. A new by-pass will undoubtedly include street lighting as will settlements themselves. As such the evidence base to support the two sites and accompanying new road infrastructure is unsound.

Landscape

4.14. Save Capel has commissioned JFA Environmental Planning ("JFA") to prepare a 'Landscape Visual Assessment' of the proposed allocation site at East Capel. This appraisal considers the current visual and baseline context of Paddock Wood and East of Capel (STR/SS 1) and then assesses the potential impact of its removal from Metropolitan Green Belt designation on the existing landscape character area. The PSLP and supporting evidence base has been reviewed and the report, which informs this submission, is included as Appendix 6.

4.15. The review of the allocation proposal concentrates on the principle of development in this location which is presently Green Belt, the landscape's capacity to accept development, and the potential effects of the proposals on landscape character and viewpoints from the High Weald AONB.

4.16. This area in general is described in the TWBC 'Landscape Sensitivity' report as providing an *'important role in preserving separation from Five Oak Green and linear development extending out eastward from it'* (page 61).

4.17. As TWBC's Landscape Character Assessment has also stated, this is a *'sensitive location for development'*. Any large-scale development is likely to have considerable consequences for viewpoints to and from the High Weald AONB.

4.18. The scale of the present proposal seen in context with other potential and consented development will have harmful effects on the landscape character and openness within the setting of the High Weald AONB and Metropolitan Green Belt, which will be hard to mitigate. There are currently three consented smaller residential sites located on the southern and eastern built settlement edges of Paddock Wood (up to 1,126 homes), and another Garden Village proposal at Tudeley (2,800 homes).

4.19. These sites will have considerable and harmful cumulative effects on what is at present open countryside within the Metropolitan Green Belt.

4.20. This level of proposed development is inappropriate for this location even if the area is removed from Green Belt and will have the following consequences:

- . *Encroach extensively into open countryside*

The proposed allocation site is situated in an area currently designated as Green Belt, a functional designation to prevent coalescence and maintain openness between settlements. Even if this area is removed from the Green Belt, the effects on the surrounding extant Green Belt will be detrimental, with a reduction in perceived openness and a perceived sprawl of development within the Low Weald landscape from Tonbridge to Paddock Wood;

- . *Reduce the gap between settlements establishing coalescence*

Whetsted and Paddock Wood will appear to coalesce and the gap between Five Oak Green and Paddock Wood will be more than halved from approximately 1km to 400m. This reduced size of gap will be barely discernible at a distance and the full extent of cumulative development (consented and proposed) will be visually intrusive in views from adjacent higher ground;

- . *Greenfield Development*

There are limited public transport facilities, and this is not a sustainable location;

- . *Have a visual impact on views in and out from the historic settlements of Capel and Tudeley*

Both Tudeley and Capel are typical Low Weald hamlets recognised as retaining vernacular character and local distinctiveness. The proposal will impact on this character and visually impact on the setting of these historic settlements;

- . *Impact on the setting of many Listed Buildings*

The hamlets of Tudeley and Capel which have grown up around Grade I churches, and the cluster of listed features and buildings associated with Badsell Manor Farm (less than 50m from development) will see visual impact and a degradation in their setting; and

- . *High level of development into the immediate setting of the AONB*

The allocation site will have visual prominence in panoramic views from the High Weald AONB to the south. The urban/rural fringe boundary at Paddock Wood is already degraded by expansive and

inappropriately large-scale sprawling development on the south and western side, which is highly visible from certain viewpoints.

4.21. In paragraph 136 of the NPPF it says Green Belt boundaries should only be altered in 'exceptional circumstances' which are 'fully evidenced'. These proposals do not meet these requirements.

4.22. In conclusion, the scale of the present allocation site proposal at East Capel is inappropriate in scale and extent.

Heritage

4.23. *5.154 Whilst there are no listed buildings within the allocated sites, there are clusters of listed buildings adjacent to the site boundaries at Badsell Manor Farm, Whetsted, Mascalls Court, and south of Church Farm. The settings of these buildings form an important part of the heritage of the town. They are predominantly related to the agricultural and productive land history of the town, featuring some examples of oast houses (for drying of hops) and traditional farmsteads.*

4.24. The strategy itself makes no mention of heritage protection or enhancement. The above refers twice to "the town". Capel is not part of Paddock Wood Town.

4.25. The masterplan heritage section is lacking any detail. 9 small paragraphs to cover the whole subject.

"Site context"

4.108 *High concentration of oast houses around Paddock Wood*

4.109 *Except for a single building within the town centre allocation, no listed buildings lie within the draft allocations*

4.110 *There are clusters of listed buildings adjacent to the site boundaries at:*

- . *Badsell Manor Farm*
- . *Whetsted village*
- . *Mascalls Court*
- . *S of Church Farm*

4.111 *The settings of these buildings form an important part of the heritage of the town".*

4.26. No in-depth research has been undertaken regarding heritage assets, for instance Tudeley Brook Farm on the boundary of the site, although not listed is within the HER as an historic farmstead. Without a clear understanding of the area of the proposal the masterplanning has not been positively prepared.

4.27. Badsell Manor itself as previously noted has 13C origins and is of great local significance as a moated manor house in a lovely rural setting and is somewhat more than just "on the boundary" – DLA do not mention this fact but do refer to a site to the east of Paddock with the remains of a former moat which would suggest a downplaying of a valuable asset.

4.28. *4.114 "The setting of the listed heritage properties needs to be considered carefully with opportunities to create views towards these historic sites"*

Whilst views towards the manor for residents of the new town might be pleasant, views from the manor and its setting do not warrant a mention!

4.30. "A revision of ancient Woodland" TWBC 2007. Map 5 shows an area of ancient of woodland south of Lydd Farm and appears to be in the path of the proposed new FOG By-Pass. "Access and Movement" by Stantec shows the indicative path but not only omits showing ancient woodland but any trees.

4.31. No mention has been made of how the IAs (Important Areas) for noise identified by DEFRA on the A228 will be addressed. One IA is Dampiers roundabout which will be significantly exacerbated by the increase in vehicles and affect the setting of the cluster of HA's located at Badsell Manor, the other the IA which runs close to Whetsted again identified above as a cluster of HA's. Again, the masterplanning appears cursory with no clear understanding of the strategic sites and cannot be considered as positively prepared.

4.32. Our Heritage team has produced a comprehensive report (appendix 11).

Transport & Infrastructure

4.33. TWBC has engaged David Lock Associates (“DLA”) to prepare the masterplanning of Transport & Infrastructure for the Strategic Sites in the PSLP. This includes an assessment of the necessary infrastructure for three scenarios: (1) Paddock Wood and East Capel, and Tudeley Village both going forward; (2) Paddock Wood and East Capel only (this Policy); (3) Tudeley Village only (STR/SS 3).

4.34. DLA has recommended scenario (1) and this has been included in the PSLP. This would require substantial new infrastructure to mitigate the impact of planned development which is set out in DLA’s Infrastructure Framework (section 6 of its Main Report).

4.35. Due to multiple developers/promoters, there are huge risks associated with the delivery of STR/SS 1 which DLA acknowledge (para 5.70) *“is dependent on forms of cooperation, collaboration or equalisation between site promoters to ensure shared facilities and infrastructure are funded and provided in a timely manner. Additional work will be required to achieve this”*.

4.36. In addition, further strategic risks would arise in the deliverability of the PSLP as the development of STR/SS 1 is dependent on the funding of much of the essential infrastructure being shared with the delivery of Tudeley Village (STR/SS 3).

4.37. Given the scale of the proposed developments and new infrastructure required, Save Capel has engaged Motion Consultants Ltd (“Motion”) to provide an independent expert review. Motion’s report is an important part of this representation and can be found as Appendix 1.

4.38. Whilst the site in East Capel (STR/SS 1) is located near existing infrastructure (e.g. A228), the PSLP has failed to assess the cumulative impacts with the local plans of neighbouring LPAs, where development is proposed at Laddingford, adjacent to East Capel (MBC) and the effect of cumulative development in the Tonbridge borough on the local road network.

4.39. Centre to centre, Tudeley Village and East Capel / Paddock Wood are only 5km apart and they share the same transport environment with regards to highways, bus and rail. It is therefore extremely difficult to understand how many of the infrastructure interventions identified as necessary for Tudeley Village are not also necessary for East Capel / Paddock Wood, e.g. improvements to the B2017 on the approach to Tonbridge is required to support the Paddock Wood allocation, inter alia, to enable the safe passing of enhanced bus services.

4.40. Yet in the absence of Tudeley Village being developed in the same timeframe as East Capel / Paddock Wood, by implication the Infrastructure Plan does not require buses to be able to safely pass on the B2017 because it identifies no requirement for improvements on this section of the B2017.

The proposed Five Oak Green by-pass is not included if Tudeley is not delivered, and Table 13 of the DLA Main Report also excludes any mitigation measures in the village (proposed for Tudeley as item 25). With the proposed level of housing growth in Paddock Wood/East Capel this means that a *“safe and suitable access to the site can be achieved for all users”* (NPPF para 108) cannot be demonstrated and the Policy is **not consistent with the NPPF** and unsound.

4.42. The TWBC transport evidence base has significant inconsistencies between reports which claim to be assessing the same matters (see Motion report paragraphs 8.7 to 8.10). The consequence of this is that the total change in road traffic arising from the 3 Allocations (in Paddock Wood, East Capel and Tudeley Village) is not clear.

4.43. Motion considers that the true impact of road traffic arising from the 3 Allocations is under-estimated because the mode shift assumptions are inconsistent and either selectively or incorrectly applied.

4.44. Therefore, the proposed significant infrastructure interventions which are fundamental to the delivery of the 3 Allocations either do not effectively mitigate the impacts of the 3 Allocations and / or are commercially unviable.

4.45. The differences in the timing and allocation of infrastructure between the Masterplanning Report, the Stantec Study and the Sweco Study and the Viability Assessment are so great as to render the Viability Assessment otiose.

4.46. The proposed phasing and delivery of these allocations is not “effective” in soundness terms because the funding of “Infrastructure” before “Expansion” is not justified in the Plan. Several pre-occupation mitigations are considered necessary by Motion, which have not been appropriately phased in the Infrastructure Plan:

- . The FOG Bypass would be required. This is because the B2017 is unsuitable to safely accommodate increases in road traffic especially heavy vehicles such as pantechnicons;
- . The FOG Bypass is reliant on delivery of the A228 Colts Hill Bypass which would therefore need to be delivered in parallel with the FOG Bypass. The A228 Colts Hill Bypass would be required any way because the road in its current format cannot safely accommodate increases in road traffic;
- . The complete network of pedestrian and cycle routes and improvements will be required. This is because pedestrian and cycle infrastructure currently does not exist connecting the 3 Allocations to adjacent settlements; and
- . A comprehensive network of bus routes will be required. This is because the current bus provision fails to cater for the demands arising from strategic development.

4.47. In order to deliver this necessary infrastructure in a timely manner, Motion considers that it will need to be advance funded by the public purse. There is no mechanism identified in the evidence base to explain how this will be achieved. Nor is there a commitment by TWBC that the public purse will be made available to cover the shortfall in infrastructure funding early in the Plan period.

4.48. Motion concludes that as proposed, the proposed residential allocations at Tudeley Village, East Capel and Paddock Wood, either in isolation or cumulatively, will result in:

- . Cumulative residual impacts on the road network which are severe; and
- . Unacceptable impacts on highway safety.

4.49. These are the tests set out in paragraph 109 of the NPPF for refusing planning permission for a development. As a consequence, there is no prospect of planning permission being granted for development at Tudeley Village, East Capel and / or Paddock Wood.

4.50. The proposed allocation at East Capel should therefore be removed from the Local Plan as it is not effective in terms of soundness and **undeliverable**.

Biodiversity

4.51. TWBC accept there will be 'perceived' coalescence between Paddock Wood (PW) at East Capel and Five Oak Green (FOG).

4.52. Whetsted Wood is vital to wildlife, but housing to the north and flood mitigation to the south, mean habitat and movement will be severely restricted.

4.53. The flood mitigation area to the south is also described as a 'Wetlands Park'. This will border the A228, which could become a danger to drivers and wildlife should retention fail in this flood-prone area.

4.54. Other DLA claim is there will be '...ecological and landscape enhancements as part of the exceptional circumstances case for the release of this Green Belt land...' Without description this is merely aspirational.

4.55. The loss of habitat and encirclement of East Capel by housing and road networks makes biodiversity gain seem impossible; it is therefore not surprising there is no clear indication as to how it will be achieved. Wetlands are no alternative to field and woodland fauna and flora.

Fauna & flora

4.56. Endangered species are present within the Capel sites, including EU protected species (Great Crested Newts, Dormice, Bats and Badgers).

4.57. Habitat loss: the proposals can only exacerbate the decline through removal of suitable habitat for field and ground-nesting birds, which will be squeezed in all directions by the developments and gravel excavations.

4.58. Four species of owl also occur in the area (Tawny, Little, Barn, Long-eared), an unusually diverse number and any loss is a serious conservation concern.

4.59. All these species should be taken into consideration by a public body performing its functions with a view to conserving biodiversity. However, there is little in the Local Plan to confirm mitigation measures beyond a 'wetlands park' in East Capel and HE's vague promises.

4.60. Rare plants include the Greater Butterfly Orchid and the True Fox Sedge (both are on the Vascular Plant Red Data List for Great Britain).

Domestic pets

4.61. Ownership: pre-pandemic 26% of the population owned a cat, 24% a dog; this has increased by 11%. (4,800 homes = 1,500 cats/1,400 dogs).

4.62. Off-lead dogs disturb ground-nesting birds and dog faeces over-enrich soil, encouraging plants like nettles, which outgrow specialist fauna.

4.63. The Mammal Society estimates UK cats catch 275 million prey a year; 27 million are birds but wild mammals, reptiles and amphibians are also killed in large numbers.

4.64. A cat can roam between 100m to 3km. This brings the RSPB reserve at Tudeley Woods and the rich Medway flood zone into the feline hunting zone. The impact on wildlife of cats will be devastating.

Summary

4.65. Policy EN9 recognises that important habitats and protected and notable species are not confined to designated sites but can be found on any site (Page 356 PSLP). The evidence gathered above supports and endorses this fact. However, the plan does not demonstrate that the strategic sites will in any way manage, conserve nor enhance biodiversity. At best the proposals are aspirational at worst destructive.

4.66. Our research team has prepared a comprehensive report on biodiversity (appendix 12).

Flood risk, water supply, & sewerage

4.67. Save Capel submitted a comprehensive flood risk, water supply, & sewerage report prepared by our research team at Regulation 18 (see appendix 13) which identified several issues with the site allocation at East Capel (then identified as PW1). These remain relevant and can be summarised as :

- . The plan does not demonstrate that the proposed development will provide wider sustainable benefits that outweigh flood risk, nor that it will be “safe for its lifetime”. The sustainability of any residential development should be considered over a minimum of 100 years. Therefore, the plan does not justify that this site, in such a location that requires measures to mitigate its flooding risk on a floodplain, will not flood in its lifetime, especially with the climate change uncertainties that must be considered.
- . TWBC has not demonstrated how the proposed mitigation measures will ensure that the development will not cause flooding in the vicinity or further down river. The loss of flood water storage in the agricultural terrain and run-off/drainage from the buildings and hard surfaces will certainly increase the flood risk to all surrounding areas.
- . The proposed development on the floodplain is in direct contrast with the policy of using the Sequential approach of locating development away from watercourses. The opportunity to restore floodplain in previously developed areas is extremely limited. Even re-wilding the flood plain would not protect the areas from surface water, drainage, and groundwater flooding together with the risks of sewage system failures and reservoir breaches.
- . The proposed development of housing, commercial, and associated infrastructure in T&M Borough will already lead to considerable additional water flows to the Medway and the floodplain. The cumulative effect on flooding has not been assessed.
- . The SFRA assesses the proposed flood defence as increasing the flood risk notably, within the now proposed major residential part, given the increase in flows across the railway line onto the north of the parcel. Flood risk also increases to the existing west Paddock Wood properties. It is difficult to see how any effective further flood defences could be formed given that most of the flooding is simply caused by rain falling on the site faster than it is able to be absorbed due to the nature of the soil. Some water may flow onto the site from adjacent areas but to block this would result in unacceptable problems for those areas.
- . The raising of occupied floors of buildings (FFLs) above ground level so that a relatively unobstructed flow route under buildings may substantially reduce flood depths. The SFRA states “*This measure was not implemented as it was agreed with the council that it would be unlikely to be deliverable given the scale and type of development being proposed*”. There have been several relevant developments recently in Capel where the EA has insisted on raised floor levels and containment (tanks, swales, etc.) with restricted discharge.
- . The raised levels facilitate the construction of containment tanks and other SuDS initiatives that should be included in the masterplanning. The proposed approach is unsound and comprehensive SuDS are required to mitigate the flood risk of the development on this fully functional floodplain and to ensure pre-treatment of contamination risk prior to infiltration.

4.68. The masterplanning for Paddock Wood (STR/ SS 1) has acknowledged some of these issues and a technical note has been included from JBA which updates its SFRA.

4.69. The notable changes in the PSLP version include the installation of conveyance channels north of the railway and, significantly, the removal of the potential strategic storage parcels to the south of the masterplan site at East Capel.

4.70. This storage would have greatly reduced the flows down Tudeley Brook and mitigate the frequent flooding events that cause so much disruption along the B2017 from the roundabout with the A228. This area is hugely significant to the increasing traffic flows from existing developments and those now proposed. The mitigation proposed within the site will have no effect.

4.71. FFLs should be set to the higher of a minimum of 600mm above the 1 in 100-year (1% AEP) plus climate change peak flood level, or 300mm above the general ground level of the site. The proposals still exclude this specification, and the Policy is therefore not deliverable. The additional build costs together with SuDS requirements will affect the viability and it is unclear how these costs have been assessed in the justification of the allocation.

4.72. JBA have assessed two options, Option 1 with development in Flood zone 2 being chosen in the PSLP. Their mapping shows that, even with the conveyance channels, increased flows will result outside the masterplan area and therefore run-off rates 'better than greenfield rates' is not demonstrated.

4.73. With the floods that have occurred in many parts of the country, and the publicity they have received, potential customers may well avoid purchasing in low lying areas where such flood risk exists. Insurance cover for flooding is likely to be difficult, expensive or even impossible to obtain, and houses built after 2009 cannot benefit from the Flood Re. Scheme.

4.74. Save Capel submits that this allocation Policy is not effective nor consistent with national policy and is therefore unsound.

Water supply

4.75. At present the water supplying the Capel/Paddock Wood area (WRZ7) is taken from Trottiscliffe and the surrounding areas (from groundwater) where it is treated. This supply is then transported via strategic mains to a storage reservoir at Bour Beech (Seven Mile Lane), then onto the Paddock Wood Service reservoir (Geddes Hill) and then out to supply the local areas. Occasionally the water is also taken from Bewl Water (a surface reservoir) and transferred to the area via trunk mains and a storage reservoir.

4.76. South East Water (SEW) has stated that the same sources will be used in the future and forecasts for WRZ7 show there would be a deficit in the amount of water available to supply the growing demand by 2030.

4.77. Whilst SEW has stated that there is sufficient capacity in the existing network to supply the planned developments in East and Central Paddock Wood, there will also be large strategic mains installed to take surplus water from a new source of water at Aylesford towards Beech reservoir by 2023.

4.78. This will allow more water to be transported in and around the WRZ7 area via the large strategic mains and to support the expected growth in consumption at East Capel. For the new source at Aylesford some of the existing network between Beech and Paddock Wood will need to be reinforced.

4.79. The Water Act enables SEW to charge developers for contributions towards any reinforcement and new mains required as a result of new development to ensure it maintains levels of service for both new and existing customers. The cost of contribution is based upon the cost of both on-site and off-site mains less all the revenue SEW receives over the first 12 years for the new properties.

Sewerage

4.80. There is a single treatment plant that serves Capel, Paddock Wood, and surrounding areas which is located at Rhoden, Paddock Wood. The total catchment area is approximately 3,600ha, with an elevation range of 7mAOD to 149mAOD and the sewerage system is primarily separate.

4.81. The Paddock Wood foul drainage system is split into two distinct areas by Tudeley Brook. The western area comprises of the village of Five Oak Green and several hamlets and farms to the south, connected to the network by a terminal SPS. In Paddock Wood piped flows drain north east to two terminal SPS discharging to the treatment works.

4.82. Sewerage from Five Oak Green is pumped to the treatment plant at Paddock Wood by a pumping station situated between Oak Road and Larkfield. There is a catchment tank which can hold enough to give time to bring tankers if the station fails. Failure occurs on a regular basis due to plant age, pipe failure both upstream and downstream, or power supply failure.

4.83. Sewer flooding is already a regular problem within Paddock Wood/Five Oak Green and, due to lack of investment over many years, the current system is already at capacity. Recent developments have been delayed/suspended as Southern Water (SW) is working with developers on additional storage capacity solutions as any further connectivity to the current infrastructure will seriously compromise existing users.

4.84. Existing sewers have already become overloaded as new developments add to the discharge to their catchment, due to incremental increases in roofed and paved surfaces at the individual property scale and sewer flooding is already a major problem. New homes are being built and connected to a sewerage system that is already so inadequate that it results in sewage flowing through the streets and the flooding of existing properties. The overload of the current network has unacceptable, unhealthy and frankly disgusting consequences for residents.

4.85. SW note that treatment capacity is currently limited at Paddock Wood, and the levels of development proposed exceed the current catchment forecast. The level of growth outlined at this stage for Paddock Wood will more than double the size of the catchment, triggering the need for investment in network and treatment capacity solutions.

4.86. Whilst land around the existing plant has been safeguarded for necessary expansion, SW do not currently have an allocated budget for any extension and have not provided any guidance on its expected delivery.

4.87. Developer contributions for local sewerage infrastructure will be secured through the New Infrastructure Charge. Additional investment in wastewater treatment works is funded by SW through the water industry's price review process as agreed by Ofwat.

4.88. It is essential that the upgraded water and sewerage infrastructure is provided in a timely manner and the Infrastructure Plan is lacking convincing detail to justify this.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Save Capel has sought to be actively involved in engaging with the Council throughout this review of the Local Plan. As a group we have developed particular expertise and have undertaken significant and extensive research in respect of the effects of the policies to which we have made representations. We consider that we will be able to assist the Inspector(s) examining the final submission significantly.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Sustainability Appraisal for Tudeley Village & Paddock Wood / East Capel

2.36. The Sustainability Appraisal of each site is based on 19 sustainability objectives ("SO"). Each objective is supported by 2-5 detailed and specific decision-aiding questions. In total there are 62 sub-questions based on a mix of subjective and objective criteria.

2.37. Working through these granular 62 sub-questions should result in a reasonably objective and transparent Sustainability Appraisal for each site.

2.38. There are two separate Sustainability Appraisals published for Tudeley Village and Paddock Wood / East Capel. Both are high-level assessments at the 19 strategic objective level – there is no link to nor any evidence of an assessment at the 62 sub-question level for either site!

2.39. Validating the Sustainability Appraisals for Tudeley Village and Paddock Wood / East Capel and considering the 62 sub-questions yields a fundamentally different outcome to TWBC's proposal in both cases: TWBC results appear to be entirely unreasonable and unsound.

[TWBC: for table, please see full representation attached as a supporting document]

2.40. For Tudeley Village - in summary at the 19 SO level (also see table above):

TWBC proposes 10 positive, 3 neutral and 6 negative scores

A bottom-up assessment reveals 4 positive, 1 neutral and 14 negative scores

2.41. For Paddock Wood / East Capel - in summary at the 19 SO level (also see table above):

TWBC proposes 10 positive, 3 neutral and 6 negative scores

A bottom-up assessment reveals 3 positive, 3 neutral and 13 negative scores (for East Capel only)

2.42. We respectfully submit that TWBC's assessment of both sites is flawed, illogical and not defensible when assessing the underlying criteria.

2.43. On a side note: It is curious that in TWBC's assessment both sites are rated with near identical scores across all criteria. While this is possible in theory, it is - given the differences between both sites - statistically-speaking highly unlikely. We cannot prove and only speculate on whether this is indicative of a pre-determined answer being approved due to its convenience. However, we can unequivocally state that TWBC's assessment of both sites is superficial and simply wrong.

2.44. For a more detailed comparison and an evidence-based rationale for each score at the 62 sub-question level please refer to the 'Alternative Sites Report' in Appendix 8.

Sustainability Appraisal for Alternative Selected Sites

2.45. As mentioned under 2.22, TWBC considered several other strategic sites that – in our view mistakenly – were ruled out earlier in the plan-making process.

2.46. As a result, TWBC did not conduct a sustainability appraisal for any of these sites. There are no published sustainability results, neither at the 19 SO nor at the 62 sub-questions level for any site.

2.47. Given the flawed assessment and poor sustainability scores for Tudeley Village and East Capel, Save Capel decided to reinvestigate these sites as potential alternatives.

2.48. Given Save Capel's limited resources we decided to focus on 2 specific sites – Castle Hill (also located in Capel Parish) and Blantyre House.

2.49. In summary at the 19 SO level (see table below):

A bottom-up assessment for Castle Hill reveals 7 positive, 7 neutral and 5 negative scores

A bottom-up assessment for Blantyre House reveals 8 positive, 6 neutral and 5 negative scores

2.50. A comparison to Tudeley Village and East Capel reveals that both alternative sites are far more sustainable and preferable. Castle Hill in particular feels like a – more sustainable – direct replacement for Tudeley Village.

2.51. We also strongly suspect that some of the other strategic sites such as Horsmonden would also turn out to be more sustainable than Tudeley Village and / or East Capel if subjected to a detailed, objective review. Unfortunately, this was not conducted by TWBC and Save Capel does not have the resources to replicate the analysis for all sites in time for Regulation 19.

2.52. For the assessment and an evidence-based rationale for each score at the 62 sub-question level for Castle Hill and Blantyre House please refer to the 'Alternative Sites' report in Appendix 8.

[TWBC: for table, please see full representation attached as a supporting document]

2.53. Key findings from Save Capel's 'Alternative Sites' report are:

The Sustainability Appraisals for Tudeley Village and East Capel are unreasonable based on TWBC's own criteria and any objective assessment

The Sustainability Appraisals for Tudeley Village and East Capel are inconsistent with the assessments of other SHELAA/strategic sites

Both Castle Hill and Blantyre House are more sustainable sites offering a similar housing potential as Tudeley Village / East Capel

Of the 437 unique sites submitted for inclusion in the SHELAA process, 323 sites were rejected by TWBC.

Based on a review of 90 rejected sites in 3 representative parishes, we recommend to re-consider 43 'rejected' sites for inclusion in the Plan INSTEAD of Tudeley Village / East Capel.

These 43 sites provide a total incremental housing potential of ca. 2,270 units (based on a conservative 30 dph). All are more sustainable than Tudeley Village / East Capel.

An analysis of 7 selected high potential sites reveals a potential housing yield of up to 10,000 dwellings through the use of alternative housing solutions.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-1 Cover Letter.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-2 Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-3 Appendices.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter Scrimshaw [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter Scrimshaw [REDACTED]
Comment ID	PSLP_829
Response Date	01/06/21 18:05
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Peter Scrimshaw
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived on Badsell Road for ~25 years and now work from home, so I am very well placed to comment on how these proposals will affect the local area. Other than the outrageous and unjustifiable destruction of green belt land, I am very concerned about how traffic levels will change on what are some quite minor roads and the inevitable increase to the flood risk in this area. There have been several recent flood events in Five Oak Green village, with water levels reaching halfway up my driveway, so these are not rare events already!

Badsell Road (B2017), Colts Hill and Five Oak Green village are already often at a standstill during the busy rush hour periods and this is before the extra traffic which will be generated by the now 1100 new homes which are already being built on the three development sites around Paddock Wood town. Note that the original proposal here was to adopt two of the three sites for ~600 new homes, but now all three sites are being developed and one of them increased in size, so this expansion has nearly doubled!

Paddock Wood has a fire station and the ambulance service centre on Eldon Way, so there is a regular stream of emergency vehicles using all the roads out of the town. Colts Hill / Whetsted Road (A228) is known to be an important road link between the Tunbridge Wells and Maidstone hospitals and I see that the Colts Hill bypass is being resurrected, with the destruction of yet more old farmland which this will require. But this scheme was first deemed necessary well before the current expansion of Paddock Wood, so how can this possibly be a sufficient solution to all of the extra traffic which this daft Local Plan will doubtlessly generate?

I see that there is also now a proposal to add a spur road from Colts Hill to bypass Five Oak Green village, which will of course destroy yet more green belt land. If you now acknowledge that you will need to bypass the village, then perhaps that should be taken as a fairly obvious clue that the proposal is inappropriate to the area? At the very least you will need to wait and re-assess local traffic flow in the area after all of the current new housing around Paddock Wood is finished and fully occupied.

I regularly walk my dog along the footpaths to the north of Badsell Road, up to the railway line and Whetsted Wood; this is an important area which is used by many other walkers & dog walkers, especially from Paddock Wood. Whetsted Wood itself is a small pocket of remaining ancient woodland, linked to the surrounding habitats by the existing field boundary hedges; it would become completely isolated by the new housing proposals.

I am also staggered by the council's outrageous hypocrisy, by proposing to build on green belt land at all, with other local planning applications often turned down for "inappropriate and harmful development which would have a greater impact on the openness of the Metropolitan Green Belt", for example 18/01767/FULL (Erection of building for six B&B rooms associated with The Poacher, Tudeley) and 18/03915/FULL (Demolition of existing buildings and erection of detached dwelling at Builders Yard, Five Oak Green).

I do appreciate that there is an obligation to plan for future housing needs, but sincerely urge you to re-assess all available brownfield sites and come up with a sensible plan which is appropriate to the area, rather than try to dump ~50% of the requirement all in one place!

Being able to deal with a single landowner is not any kind of justification for the destruction of such a large area of green belt land and the location is rather inappropriate anyway, being on the River Medway flood plain and right on the boundary of Tonbridge & Malling Borough Council.

Question 6

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Re-assess all available brownfield sites and especially give serious consideration to the proposed development plan for Castle Hill (still within Capel), which has good road access directly onto the recently upgraded A21 and also close proximity to rail transport at High Brooms station

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Shipbourne Parish Council
Address	[REDACTED] Ightham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Shipbourne Parish Council (Parish Clerk [REDACTED])
Comment ID	PSLP_173
Response Date	17/05/21 16:39
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Shipbourne Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Paragraph Numbers 5.153-5.193 & 5.200-5.229

Map Numbers 26-29, 31-34 and Inset Maps 4,7,8,9

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

- 1 The Allocations at Paddock Wood, Capel/Tudeley are unsound because it is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- 2 The main service areas for these developments are either Paddock Wood or Tonbridge. Most of the Tudeley development will look to Tonbridge as their main service centre which is within the Borough of Tonbridge and Malling.
- 3 The following will impact on Shipbourne residents:
 - **The capacity of the railway station**

This is currently Shipbourne's nearest mainline station to London that provides a fast and regular service; Capel and Tudeley new residents will use Tonbridge rather than Paddock Wood due to proximity. Congestion around the railway station, parking issues and capacity of the rail system are issues that should have been discussed with South Eastern Railways and Tonbridge and Malling BC as part of the Duty to Cooperate. Have these conversations been undertaken and if so what were the outcomes?

. **Increase the existing problems of air pollution within Tonbridge High Street**
Tonbridge and Malling has proposed allocations at the southern end of Tonbridge which if included in the next Local Plan will already put the High Street under undue pressure in relation to air quality. Air quality in Tonbridge High Street is of interest to Shipbourne residents as secondary children pass through the High Street on a regular basis to access the secondary schools. It is also the nearest large service centre for Shipbourne residents. Has Tonbridge and Malling Borough Council discussed the problems of air quality with Tunbridge Wells BC as part of the Duty to Cooperate? If so what are the actions that Tunbridge Wells BC propose to undertake to ensure that Tonbridge High Street is protected from increase in poor air quality caused by increase in traffic from Tudeley and Capel allocations? The SA indicates that the Capel/Tudeley allocation would create 'a worsening of the AQMA on Tonbridge High Street must be considered (cross boundary impacts)'.(Page 93)

Impact on the number of secondary school places available and opportunities for adult education for Shipbourne residents.

Has the school provision been part of the discussion with Tonbridge and Malling Borough Council as part of the duty to cooperate? The Comprehensive school at Paddock Wood is already oversubscribed.

If so what provision will be made for the education of Tunbridge Wells's children? When will the proposed secondary school at Tudeley be built and commissioned in relation to the build out of the development? Will there be restrictions on the entry into Tonbridge schools from Tunbridge Wells? The Schools serving Tonbridge and Malling already accept children travelling into Tonbridge from outside the Borough. The SA states 'All new educational pressures created are expected to be met by provision of new or extended schools. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells would continue to meet this demand.'

i) How, where and when is the secondary school provision to be made in relation to the programming of development?

ii) It is likely that the Adult education provision in Tonbridge would be used in preference to Tunbridge Wells' provision due to proximity.

Impact on Tonbridge and Malling from flashy run off into the flood plain of the River Medway

This will be exacerbated as climate change impacts increase. Flooding in Tonbridge High Street impacts on residents of Shipbourne as it is their main service centre and most of the secondary pupils need to pass through Tonbridge to reach their schools. The economic impact of major flooding within the Borough of Tonbridge and Malling as a result of allocations impacting on flash run off into the Medway could be major unless correct flood prevention methods are undertaken in the Medway valley which will address the situation. When and how will this be done in relation to the build out of the new developments? Will SUDS in the new developments at Capel and Tudeley be sufficient alone? The impact of flood waters downstream of Tonbridge (within Tonbridge and Malling), back up of flood waters into Tonbridge town centre and downstream flooding at Yalding has not been properly assessed or talked about in the Local Plan. There is no evidence that this has been sufficiently addressed with Tonbridge and Malling Borough Council and the Environment Agency as part of the Duty to Co-operate.

1 Conclusion :

None of the above issues have been addressed sufficiently in the Sustainability Appraisal or through the Duty to Cooperate with Tonbridge and Malling Borough Council. Issues have been left for consideration subsequent to the adoption of the Local Plan. This is unacceptable. The issues raised above should be identified in the Local Plan and unless they can be satisfactorily addressed with programmed actions set out in policies within the Local Plan it is considered that the plan is unsound. Furthermore it is considered that unless these issues have been fully considered and discussed with TMBC under the duty to co-operate (DTC) and there is a statement of common ground addressing these issues that the Local Plan fails on its DTC.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Actions needed to be addressed to make the plan sound:

The issues raised above should be identified in the Local Plan and unless they can be satisfactorily addressed with programmed actions related to the build out of development which are set out in policies within the Local Plan it is considered that the plan is unsound.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Julie Shrubb [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Julie Shrubb [REDACTED]
Comment ID	PSLP_245
Response Date	21/05/21 13:41
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Julie Shrubb
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

This plan does not take into account the amount of traffic going from Paddock Wood to both Tonbridge & Tunbridge Wells. The roads are used for commuting and schools. Both the Government & Royal Family (Prince Charles) are promoting the planting of more trees, being outdoors and encouraging wildlife habitats. This plan is doing the opposite - vast amounts of land to be descimated for housing. With the developments already happening in Paddock Wood we were promised infrastructure first. The main road at the junction of Badsell Road was due to be changed to allow for the development. This hasn't happened.

Question 6

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The plan is no longer in line with the Government guidelines since the pandemic has has happened. People will no longer need to commute in the numbers as previously as more home working will take place. Government are now advising green spaces to be of more importance than ever. This plan is going to do the complete opposite.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Keith Sinclair [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Keith Sinclair [REDACTED]
Comment ID	PSLP_290
Response Date	23/05/21 17:04
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Keith Sinclair
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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xxxx Nursery Road

Paddock Wood

I have been a resident at the above address [TWBC: Full postal address redacted for data protection purposes] since 1982 working in London for the last 28 years of my working life. I have been fully retired for 6 years.

I have participated in local organisations for some years and worked for 6 years with the Citizens Advice Bureau in Paddock Wood.

I am particularly interested and concerned with the proposed very rapid growth of the town and how this will affect all residents.

A. Compliance with Legal and Procedural Requirements

I am not competent to comment on whether the process which Tunbridge Wells Planners have followed meets legal requirements.

My main concern is that these processes have taken place in a severely restricted climate due to the Covid Pandemic. The consequences of this are that many residents do not realise what the borough council's proposals for Paddock Wood are and how it is likely to impact their lives.

Current housing approvals under construction are likely to increase the population by 30% with no improvements to the area infrastructure which is already severely stretched.

The new proposals being commented on in this document are likely to double the population of Paddock Wood in the next few years. This will radically change the living environment of the local population.

The borough council has been unable to communicate adequately to local people because of the severe restrictions on movement imposed by the government. However, they have continued to progress schemes and gain borough council approval without the possibility of proper communication to Paddock Wood and Capel residents and not allowing for comment and opinion to be voiced in a democratic way.

Paddock Wood Town Council has been involved in the communication loop but has not been able to involve residents as might reasonably have been expected. The Town Council members voted against the Plan, but this was overridden by the Borough Council.

I believe that a "time out" should now be put into the programme to allow proper communication with and input from residents. The plan should then be discussed again by the Borough Council under examination with more evidence being available before any implementation.

B. Soundness of Plan

- 1 Flooding – Much of the area of the proposed construction of 3,500 new houses in the Paddock Wood / East Capel area is in Environmental Agency designated flood risk zones 2 and 3. **The Borough recognised these risks by designating the area as not suitable for further development in the last Local Plan 2016.** This proposal therefore is a sharp reversal of uninformed opinion. The Kent County Council has instigated various investigations over the last 20 years as a result of many flood incidents in Paddock Wood. These have been carried out by specialist consultants, the most recent in 2014 / 15 by Jackson - Hyder. This was called the "Paddock Wood Flood Alleviation Study." Hydraulic Modelling of the local water courses was

undertaken, and recommendations were proposed to mitigate the risk of future flooding to varying degrees based on the remedial actions taken or not taken.

I believe it is essential to update these studies before building work is considered in the area, to take account of changes which have taken place in the intervening years. This study should also consider and predict the effect of the considerable impact from new building works and increased surface water drainage to water courses. This change should initially consider impacts from the Mascall's Court Road site involving Berkeley Homes and the Church Road and Mascalls Farm sites. The footprints of building, walkways and roads is considerable with water run-off into existing water courses. Past modelling work of flows will be made irrelevant as a result of these large new developments. Then the modelling must consider the much greater impact of the proposed Paddock Wood / East Capel developments.

More is now known also of the impact of Climate Change on the frequency and intensity of severe weather events and the Environment Agency should be asked to respond to the effects on Paddock Wood and its' residents.

The potential blocking of ducts under road and railway must be of considerable concern in times of high rainfall and the responsibility for maintenance of these is unclear.

Flood alerts have been issued by the Environmental Agency on many occasions to the high- risk areas. This has certainly been the case in areas to the north of the railway and to the west of the Maidstone Road in my experience.

Household insurance with respect to flooding, has been available to residents at a premium but the impact of approved developments and in particular the Paddock Wood / East Capel major development may make insurance prohibitively expensive or not offered by insurers. **New studies must be undertaken to investigate the impact of proposals before work starts. The studies must be under the control of an expert authority with no clear interest in the outcomes.**

Removing wooded and agricultural areas will inevitably reduce the ability to absorb surface water. The need is for a "betterment" of existing flood risks and not the deterioration which is inevitable from construction on this scale on high flood risk land.

1 Infrastructure

- . Medical facilities in Paddock Wood are stretched now before the impact of the 1000 houses currently under construction bringing maybe a further 3000 people into the town. This is a major concern to residents without the impact of such a significant further expansion from the Paddock Wood / East Capel proposals. It has been difficult to attract Doctors to the Woodlands Health Centre, especially those working 5 days per week. This is already a town priority.
- . There has been no permanent police presence in Paddock Wood for many years and we rely on a service from the CranbrookTonbridge In emergency situations this is unacceptable to us. Visible police presence in central town areas does not happen. Control of vehicular speed though the town and of illegal parking no longer happens. **There appear to be no plans for an improved service with these major town expansion schemes?**
- . The most recent new housing occupancy indicates that each household has 1 or 2 cars. There are significant traffic flow problems in Paddock Wood already during busy periods of the day. Expansion plans in the town and surrounding areas show no road improvement schemes affecting Paddock Wood. Applying new bus routes and cycle lanes is to be applauded but there is no indication that residents now, and in the future, will not still use their cars most of the time. Traffic hazards and flow interruptions will become an even greater problem than at present.
- . The capacity of the town effluent treatment plant and pumping station has been reached. It was believed Mascalls Farm new properties would not be connected to the treatment works, instead relying on cess pits. Now it seems the decision may have been reversed? Either way, significant new investment will be required in order to accommodate the foul effluent from 3,500 new houses. Who will be pay for this other than Water Company customers and when will this investment be made? **I believe think the risk of overflows from the treatment plant direct to the Medway in times of high rainfall will be significantly increased.**
- . There appears to have been a reduction in fresh water supply main pressure as new housing is brought on-line. Major investment will be required in water supply to housing and business to meet future demands.
- . There will be insufficient school capacity to meet the demands of the 1000 homes currently under construction, but the Kent County Council has turned down the application for a new primary

school. If 3500 homes are built in this proposal new capacity will be required early in the development programme. How will this be funded?

- . In summary the Town infrastructure is weak now and will need considerable work in the future with the extensive expansion. The draft plan suggests all kinds of possibilities but who will be accountable for implementing these? Experience indicates no interest from the borough in making investment in this area and the appointed developers will have low priority on spending in areas which has no financial return. I have no faith in the delivery of the “promises” of the plan.

1 **Environment and Biodiversity**

- . The environment of the fields and wooded area of the flood zones scheduled for development is a pleasing area, much used by those exercising and dog walkers. There is a wide variety of animal and bird life. How can the proposed development improve this?
- . I estimate that up to 75% of the total green space currently in the area will be replaced by the footprint of roads, housing, driveways, footpaths and cycle paths. The massive increased water run-off into water courses will risk the environment considerably. Noise and air pollution will be substantially increased during the long construction period and forever after completion.
- . The evidence for this level of housing demand must be carefully scrutinised as in some parts of the country the figures have been shown much exaggerated.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Michele Sinclair [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Michele Sinclair [REDACTED]
Comment ID	PSLP_291
Response Date	24/05/21 15:04
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Michele Sinclair Paddock Wood Residents' Association
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1 Strategy for Paddock Wood, including land at east Capel	
STR/SS2	
STR/PW1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My name is Michele Sinclair and I have been a resident of Paddock Wood since 1983. I am now retired but was Headteacher of Sackville School, Hildenborough, for 14 years prior to retirement.

I am the Chair of Paddock Wood Residents' Association, the Chair of Paddock Wood University of the Third Age - the largest community group in Paddock Wood and I am a member of Paddock Wood Flower Club. I have been involved in a number of different local associations over the years. I have brought my children up in Paddock Wood and they both attended Paddock Wood Primary School and then Bennett Memorial School, Tunbridge Wells.

As a long term resident of a small rural town I am most concerned at the impact that these vast changes will have on all residents, their children and visitors to the town.

I am not qualified to make any statement on the legality of the plan or whether it is compliant, however, I am qualified to make statements on the soundness of it.

FAIRNESS AND BALANCE

- . This proposal has been rushed through during lockdown when residents were only permitted to leave their homes for essential journeys; communication and consultation with the local population during the pandemic and lockdown has been minimal. Therefore, there is probably little realisation in many of the population of the impact this further planned town expansion will have on their lives during construction and beyond.
- . Many people do not have access to computers and those without internet access were invited to "make an appointment at Tunbridge Wells Borough Council to view the plan" - as we were under government rules not to venture from our homes, this was both disingenuous and against government rules. Our Library has been closed since March 2020 because of Covid so no-one could use the computing facilities in it.
- . As a result of this lack of proper consultation during the pandemic, organised opposition has been extremely difficult, therefore, this development must not proceed before a mass meeting of Paddock Wood and East Capel residents is called to explain the plans and to satisfactorily allay the many serious concerns that residents have, and any final decisions must be postponed so that a full and proper consultation can take place.
- . The Plan contains many hundreds of pages, written in almost unintelligible language with much repetition. No layman, no matter how concerned, can be expected to understand all the technical details, or to plough through so many hundreds of pages of such turgid prose, when with the best will in the world, it is not understood.
- . The borough of Tunbridge Wells is large, yet thousands of houses are proposed for a small area of the borough, which is neither fair nor equitable. Paddock Wood currently has three housing development sites in construction: it would be more sensible to see how these 1,000 extra houses,

people and cars settle in before any more major developments are permitted. Paddock Wood Town Council voted against the plans but were overridden by the Borough Council. Our town will more than double in size in this plan is approved and materially alter all our way of life.

- . Most of this proposed development is in Green Belt or Flood Zone and no Brown Field sites have been identified in it at all. Clearly it is more cost effective for developers to build from scratch, but it is much better to build on Brown Field sites first. Why have no Brown Field sites been identified?

JUSTIFICATION

- . The railway station at Paddock Wood has been stated as a major factor for the location of this development but when one sees the numbers of cars now in the station car parks this must be seriously questioned and the station should not be a major factor in decision making for such a massive development, nor justify a need for the expansion into green belt, flood zones and destroying prime arable land. Our rail station has a good service into London, however, the trains come up from the coast, stopping at many places, so that by the time they reach Paddock Wood they are virtually full and by Tonbridge, the next station up, it is standing room only: Southern Rail have no plans to increase capacity on the line.
- . There is a reasonable up-take of property currently under construction to the east of the town, but many more homes are still under construction and some time from release to potential buyers. Based on house prices on these new developments under construction it is unlikely that any could be considered affordable for first time buyers from Kent.
- . The national birth-rate is falling and government plans to restrict immigration to those with the skills needed in the workplace will also have an effect to decrease the future population. Where is the justification for this level of housing?
- . The Office for National Statistics' data for future housing requirements is in error in Coventry, and therefore the numbers planned/required must be seriously questioned for our area.

FLOOD RISK

- . The main objection to the proposals in the Paddock Wood / East Capel area is that land is in designated Flood Zones 2 or 3 and is likely to be inundated by river and water courses, witnessed by many Environmental Agency flood alerts over the last and many previous Winters. The borough council agreed with this information in the last Local Plan 2016 and designated much of the area now proposed for development as "unsuitable for development" because of the flooding risk. No major flood alleviation has been carried out since so the position cannot be reversed now for the sake of expediency.
- . Currently the land in question is largely used for agriculture or is wooded. In this state the land can absorb large quantities of rainwater into the water table above clay, with run-off available into water courses such as Tudeley Brook and streams unnamed when the land is saturated. It is estimated that the construction of 3,500 properties in the area will reduce the capability to drain naturally by at least 75% due to the footprint of the housing, drives, pathways, cycle tracks, parking areas, current industrial sites, and roads to be constructed. The run-off from the developments will have to drain into the existing water courses leading to a significantly increased risk of flooding of all housing in the area to the west and north west of Paddock Wood.
- . Mitigation, such as allowing water to be accommodated in a new lake to take surface water can seem to give an "appealing" environment as a paper exercise; if the lake is not allowed to fill it will be very unsightly in an urban situation, and when that lake becomes full where does the excess water go? Evaporation rates will be minimal, and it is known that severe weather events are likely to become more frequent and to cause much more flooding as Climate Change continues to occur in the future. Developers must indicate examples of similar developments in flood prone areas where mitigation has proved successful by the methods proposed and calculations should be checked by an "independent authority" which is not under the pressure to build housing: a Strategic Flood Risk Assessment must be carried out by an independent person and not one influenced by a desired outcome, as risk assessments are necessarily subjective and therefore potentially biased. The Environmental Agency must update their assessments based on the proposed new developments.
- . "Betterment" of the existing flood risks to property is required before any new schemes are considered.
- . Currently house holders in the areas of this development can get insurance cover, at a premium, based on historical data of flooding, despite the Environmental Agency's area classifications.

After building 3,500 houses in the designated flood zones, houses may well become uninsurable against flooding risk. Has the borough council consulted insurers on this issue?

- . If the development is completed and flooding occurs, as expected, with the losses to property and potentially human life, who will be held responsible for the decision to build in Flood Zones 2 and 3? Will it be the head of Planning at Tunbridge Wells Borough Council? Will it be the developers responsible for the construction? Will it be “consultants” employed by the above to provide the desired answers? Specific people are taking the decisions and those people must be accountable for any future flooding.
- . The Maidstone Road surface water drain is overloaded whenever heavy rain occurs. The solution to the regular flooding of the junction of Nursery Road and Eldon Way was to lay a new relief pipe from the flooding area in a westerly direction to the nearest fluvial take away stream. This will be effective as long as the water level in that stream allows flow and no reverse flow occurs. This was clearly the cheapest option and has been successful to date but not when new housing overloads that stream with substantially more run-off.
- . Very localised flooding has occurred in the past when water courses under roads have become blocked in times of high rainfall. Often there is considerable reduction in flow capability by small pipe diameters and inevitably these will be blocked by floating obstacles carried by the fast water flows. Housing to the north and north west of Paddock Wood is regularly threatened with flooding – I give the Environment Agency warnings as evidence.
- . The wooded area of land absorbs a substantial amount of water – I offer evidence with the Environment Agency’s maps showing where Flood Zone 3 merges into Flood Zone 2 where the land is heavily wooded: crops and trees soak up water, but concrete does not.

INFRASTRUCTURE

- . Paddock Wood has three major housing developments in progress – Mascall’s Court Farm, Mascall’s Farm and Church Road, which will add approximately 800 new houses with the option on these sites of a further 360. There have been no infrastructure changes coming from this current expansion so that the current residents can live their lives without increased difficulties due to the expected population increase. The Borough Council “infrastructure first” political statement has not been followed through, nor will it be as commercial interests are being allowed to dominate. Tunbridge Wells Borough Council has failed to offer any financial support to improve the infrastructure from current developments, with the likely 3,000 extra population.
- . Our bus service to surrounding local towns is woefully inadequate and has been severely cut in recent times and so all the new residents of the current developments will be car users of necessity.
- . The existing medical centre already struggles to cope, with no doctor working a 5- day week from choice. The Borough Council cannot force commercial interests to build another medical centre, despite the Medical Commissioning Team saying that a further centre will be needed. Often only locum doctors are available for residents with no continuity of care and the difficulties for all local residents of getting appointments.
- . Foul effluent capacity has been reached with new housing to the east of the town in some cases having to install cess pit collection. The pumping station has been at capacity for many years and simply limps along. One can foresee in times of high rainfall the effluent treatment plant for Paddock Wood overflowing raw sewage directly into the Medway without substantial investment.
- . Southern Water said some years ago that the Paddock Wood Pumping Station was at capacity: a proposed foul water ring main for Paddock Wood has **not** materialised. Southern Water has recently conducted an “internal review of modelling processes and standards” as an alternative to installing a Pumping Station and Rising Main and decided that their previous model was out of date and that a further 246 properties at Church Road can now be added to the drainage system. Modelling can produce almost whatever outcome the modeller desires, but this solution of course is so much more cost effective than building what is desperately required for Paddock Wood. When it is completely overwhelmed by heavy rainfall, we run the real risk of raw sewage flowing into our homes and streets because of this irresponsible modelling. There has been localised flooding in the Church Road area on several occasions and allowing these properties to connect to the network is a recipe for disaster. To accommodate the other new properties currently being built, Southern Water further propose putting holding tanks for sewage in Ringden Avenue which is archaic in this day and age, but it is a cheap solution. A new Pumping Station is required for all the new properties currently being built and most certainly before any other development is permitted.
- . Kent County Council refused to fund provision of a new primary school to coincide with the 3000 extra population expected with the current expansion in progress as it was not “required.” KCC

knows that it will be cheaper to provide extra Portakabins and another teacher on the existing primary school site and infill at all local primary schools. New schooling will have to be put in early within this proposed development project to improve infrastructure but needs to be funded and developers will not put in funding when houses are not sold.

- . Social Care has been significantly reduced in Paddock Wood, there is no care home for the elderly – Capel Grange is the nearest facility, and other facilities for the elderly are non-existent. The few child-care facilities are full and only one has purpose-built accommodation.
- . Carbon fibre networks are not widely available to existing houses for rapid internet service which will deter anyone working from home and thus put further pressure on the need to commute with over-crowded trains.
- . Fresh water supply will be an issue as it is noticeable that supply line pressure is dropping with the impact of demand from new housing taking its toll. This will require more investment from S.E. Water / Southern Water and / or the developers and they all seem to be extremely reluctant to make any sort of commitment.
- . In summary, infrastructure will be the last thing addressed based on historical performance and all the current residents of Paddock Wood will be made to suffer for many, many years to come.

FOOD SECURITY AND BIO-DIVERSITY

- . We have seen with Brexit, that the trading of goods and vaccine supplies across our borders is very susceptible to disruption. It is essential therefore, for our small island to be more self-sufficient. This proposal removes hundreds of acres of arable land from the food supply chain and that must not be permitted: one of the farms in question was mentioned in the Domesday Book.
- . There are large swathes of wooded areas under this threat and some are ancient woodlands, e.g. Whetsted Wood. Currently we have a wonderfully bio-diverse area with a vast variety of wildlife, from bats to badgers to foxes to hedgehogs to dormice etc. plus a significant array of birdlife including owls, woodpeckers, herons, hawks, buzzards, kingfishers, cuckoos, little egrets, and the more common garden birds regularly seen. The land is home to wood anemones, bluebells, wild garlic, lady's smock and many other plants too numerous to mention. Residents have witnessed the current developers cutting down trees with nesting birds and with preservation orders, demolishing bat habitats and more - Tunbridge Wells Borough Council Officers have not protected these trees and the wildlife, which gives no comfort in their future actions. When commercial interests hold sway, biodiversity is completely ignored, and it must be protected for our future and our children's future.
- . Much of the area earmarked for this development has been used for informal recreation for many decades and it has never been more important than during this last 18 months of the pandemic when it was so important to exercise outside. Areas of open land available for recreation and dog walking are rapidly disappearing. The developers are paying lip-service to "green spaces": we already have delightful green spaces and do not need to have any manufactured spaces, and do not need our current spaces covered in concrete with houses, roads and the like.
- . Housing must be built using methods and materials at low or zero carbon input but there appear to be no clear guidelines for developers. The current new housing developments in Paddock Wood are not incorporating low energy methods of heat pumps and solar cells by decree.

EMPLOYMENT

- . The plans show housing construction but little building for employment; perhaps this is because there is minimal profit in this type of building as opposed to housing which commands a premium. Most of the employment in Paddock Wood is warehousing and storage, with a little light industry, and very little office space. Warehousing offers a very limited number of jobs so where are all these new people going to work? Tunbridge Wells Borough Council are not doing anything to stimulate employment in the Paddock Wood area so why is a huge increase in housing being proposed as there is no demand for people to move here?
- . New buyers may well have to commute to London and hence the development of a thriving community in Paddock Wood may only become another commuter town and part of an ugly urban sprawl.

TRAFFIC

- . A recent inspection of the new development at Mascall's Court Farm (the most advanced) indicates that occupied houses have one and two cars. This means maybe three hundred further cars already into the local traffic systems. The effect therefore of 3,500 new houses in the West Paddock Wood / East Capel could lead to a further 5,000 vehicles. Buses and cycle lanes are good but as soon as substantial supermarket shopping is required a car is essential. People will

slowly change habits and attitudes, but cars will remain essential to buyers of these houses as the distance to the shops is too far to walk with shopping. Our supermarket carpark is always full now and it will be overwhelmed with so many more cars.

- . The nonsensical proposal to close the main east/west through route to all but buses in order to “force” people to walk beggars’ belief! We have an ambulance Make Ready Depot in Eldon Way, north of the railway bridge, and ambulances are regularly dispatched on emergency calls from the depot – despite a planning ruling stating that they must not. For residents north of the railway bridge a short journey into the centre of Paddock Wood would, with this proposal, result in a journey of some many miles and all the resultant particulates being emitted into the air. Heavy goods lorries will be forced to use small and unsuitable roads around the town for access and this will cause untold disruption to the residents of these small lanes. Residents of out-lying villages will all be deterred from coming to Paddock Wood because of the difficulties that this closure would cause and force them to make longer journeys further afield for their shopping.
- . This same document states that Old Kent Road is a “through road” when it is a narrow one-way road, unsuitable for anything other than light traffic.
- . The proposal to remove parking in the centre of Paddock Wood to “make it look more attractive” will effectively kill all the current small business who thrive there. As part of the Covid road closure schemes, Commercial Road was closed to through traffic which resulted in disabled drivers not being able to access shops, delivery vehicles being unable to supply the supermarkets and a marked drop in shoppers to all the local businesses. The Town Council successfully appealed against it to Kent County Council, and it was rescinded.
- . There are many existing pinch points to traffic flow on the Maidstone Road both to the south of the rail bridge by Evernden cycle shop and Tom Bell fish and chip shop and to the north by the Aycliffe dentist and residential properties. The proposed significant developments will have a huge increased traffic load on this vital link to the centre of Paddock Wood. Large articulated lorries currently use the road north of the railway where it is very narrow, to enter the Eldon Way industrial estate and then past the “back” way into Transfesa. Vehicles over 7.5t regularly cross the railway bridge contrary to the road sign. If this Local Plan is given approval, then as part of the infrastructure, a new road must be constructed to take the heavy vehicles away from these narrow pinch-points and residential properties.
- . There are no plans in the proposed Local Plan to improve roads other than a by-pass of Five Oak Green which was the cheapest option by creating a new road from Capel Hill towards Tonbridge, off an already busy road to Pembury. The Health and Safety of the local population is not being considered as young children and adults will be exposed to massive traffic dangers and air pollution which will blight their lives.
- . If there was a presence of Traffic Wardens and PCSOs in Paddock Wood, then motorists who park illegally on pavements and yellow lines could be dealt with properly to enforce the law.
- . We would welcome the 20-mph speed limit as no traffic, other than a very occasional vehicle, keeps within the 30mph limit on Maidstone Road the B2160 and it feels very dangerous waking on the pavement so close to speeding traffic. There has not been a speed check on vehicles by police in recent memory whereas it used to be checked maybe 2-3 times per year and was an effective measure. Police presence is rare unless there is a road accident and a recent attempt to contact a local PCSO proved almost impossible. If there was a presence of Traffic Wardens and PCSOs in Paddock Wood, then motorists who park illegally on pavements and yellow lines could be dealt with properly to enforce the law.
- . The County Police Commissioner states a significant increase in police numbers but they are not being deployed in Paddock Wood/East Capel as there is no evidence of their presence. Our police station has been sold for re-development and we must telephone a station 8 miles away if we need a policeman: Paddock Wood effectively has no police presence.

In conclusion the proposed Local Plan is an unmitigated disaster for Paddock Wood/East Capel residents on so many grounds, and if it is approved our quality of life will suffer greatly over many years. Commercial interests have been allowed to influence the planners to such a degree that there the needs of the residents have been completely subsumed: please do not permit this to happen.

Michèle Sinclair

Paddock Wood residents' Association.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Rachel Smith ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rachel Smith ([REDACTED])
Comment ID	PSLP_2130
Response Date	04/06/21 16:15
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Rachel Smith
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Paddock Wood for over 30 years and am acutely aware of issues that affect the local area as result of development.

We have yet to see the effect of the current new developments around Paddock Wood, amounting to over 900+ homes, so increasing the town by a further 2000+ homes would be significantly detrimental:-

Paddock Wood already suffers from flooding affecting existing properties and a massive increase in the number of homes will exacerbate this problem dreadfully. The area of East Capel to the west of Paddock Wood lies on a flood plain so the idea of locating over 2000 here seems ridiculous!! Mitigation measures may be inadequate, have a detrimental effect on existing properties locally or cause problems downstream in East Peckham, Yalding, Golden Green, Tonbridge and elsewhere. Huge amounts of money spent on flood mitigation could result in diverting funds from other essential infrastructure.

There are problems with foul and surface water drainage in Paddock Wood with the current system unable to cope. A further large growth in the number of homes will require significant improvements to the system which should, in my opinion, involve increasing the capacity of the local treatment works as the current proposal to cope with the expected rise in the volume of waste from the 900+ homes currently being built merely involves expanding the pipe network for holding untreated waste.

There is already congestion on the local roads with some already difficult to negotiate due to on road parking and volume of traffic. The proposal for 2000+ homes in addition to the 900+ already being built will increase the number of vehicles in the local area phenomenally, causing horrendous additional congestion on roads that were not designed to accommodate large volumes of traffic and there would be significant detriment to the air quality from vehicle emissions.

The proposal to close Maidstone Road railway bridge to vehicle traffic (except buses) on page 48 of the LCWIP Local Cycling and Walking Infrastructure Plan (LCWIP) Phase 2 - Final Report is ridiculous as it is a key route into Paddock Wood and re-routing traffic along other roads into the town will cause immense congestion.

The area designated for development is Green Belt land specifically set aside for preventing urban sprawl and protecting the rural environment between existing conurbations. I understand that the Inspector's comments on the Site Allocation Local Plan 2016 referred to not accepting a need to allocate any land within Green Belt for development. Adding so much housing will result in the destruction of woodland, hedgerows, meadows, and farmland that should be maintained. It will spoil the landscape and kill wildlife when we should be protecting our environment and its precious biodiversity for future generations. This area should remain rural with agricultural land that can be used to provide food.

Brownfield sites and alternative locations within the borough should be developed and full use of the existing housing stock (ie occupation of ensure vacant properties) before Green Belt land is lost forever. With the increase in working from home the conversion of vacant office space to dwellings should be considered. Surely it would be more appropriate to focus on regenerating Tunbridge Wells town centre before destroying the beautiful countryside around Paddock Wood.

Tunbridge Wells BC do not appear to have addressed the concerns and objections raised by residents and responders to the Regulation 18 consultation in relation to the extent of housing proposed for Paddock Wood.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Claire Songhurst [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Claire Songhurst [REDACTED]
Comment ID	PSLP_53
Response Date	25/04/21 17:52
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Claire Songhurst
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

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- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Having grown up in Tonbridge, I have lived in Five Oak Green for 27 years with my husband and we raised our two daughters here. Not only is it a wonderful, caring community, but its proximity to countryside and walks make it a wonderful place in which to live.

The plan to build on the land at East Capel seems disastrous to me for the following reasons:

- 1 It is Green Belt land which should only be built on in "exceptional circumstances". TWBC's own assessment in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel.
- 2 It would effectively mean Five Oak Green merges into Paddock Wood, depriving the village of its own identity and character.
- 3 Whenever we have substantial rain, the sewers in the village cannot cope and pumping lorries are required to try to prevent floods and damage to properties and gardens. The land at East Capel forms part of the flood plain, so this situation would only get worse.
- 4 The plans to build at East Capel, together with the Tudeley village mean that half of the housing needs of Tunbridge Wells borough would be built in this parish of 913 homes.
- 5 Over the years, as the population has increased, the traffic flow has become worse with the village being used as a 'rat run' particularly at peak times. These rural roads would simply not be able to cope with the increased traffic such a development would bring.

There is a huge campaign against these proposals and I do not feel that Tunbridge Wells Borough Council have listened to its residents (the people they are supposed to represent) and the many comments and objections made during Reg 18.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Richard Songhurst [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Songhurst [REDACTED]
Comment ID	PSLP_703
Response Date	31/05/21 18:30
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Richard Songhurst
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- ☐ It is not effective
- ☐ It is not justified
- ☐ It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I have lived in Five Oak Green with my family for the past 26 years and have been very happy due to the friendliness and community spirit generated by the whole mix of population number and closeness to both town and country. However, it has slowly been getting busier over time especailly the road on which we have lived over this time and I feel that this massive increase in population levels can only make it a lot less attractive place to live. Already there are shortages of school places, doctors, dentists and other ammenites for only the slight increase of people. Another reason to object to such a vast increase in houses and people is the fact that the whole area already has serious flooding issues when we have heavy rain and many of these new houses are planned on the flood plain. Also, we frequently have sewerage problems in the village due to the size and poor condition of the infrastucture. We really enjoy walking through the countryside and seeing all the varied wildlife around our village which is supposed to be protected by the green belt presently and so I am not sure how TWBC can build on this land.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- ☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- ☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	South East Water
Address	Rocfort Road SNODLAND ME6 5AH
Event Name	Pre-Submission Local Plan
Comment by	South East Water ([REDACTED])
Comment ID	PSLP_1581
Response Date	04/06/21 14:02
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	South East Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR/SS 1, STR/SS 3, EN 2 and EN24 – see Comment Numbers PSLP_1581, PSLP_1587, PSLP_1589 and PSLP_1591]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Proposal: Tunbridge Wells Borough Council Pre-Submission Local Plan

South East Water would like to thank Tunbridge Wells Borough Council for bringing the Tunbridge Wells Borough Council Pre-Submission version of its Local Plan to our attention.

Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP19 in August 2019. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 60 years up to 2080. The plan takes into account planned housing growth as well as the potential impact of climate change and includes our ambitious water efficiency programme. For more information please visit our

website:<https://corporate.southeastwater.co.uk/about-us/our-plans/water-resources-management-plan-2019/>

In South East Water's most recent business plan we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our business

plan:https://corporate.southeastwater.co.uk/media/2901/sew_five_year_business_plan_2020-2025.pdf

We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the wider south east region and are nationally represented in the Water UK water resources long-term planning. Our aim of reducing demand requires the use of new approaches and technology. Although there is some uncertainty on the level of savings that can be achieved we are seeing a development of new technologies and we are committed to reduce personal water usage and leakage levels in order to be more sustainable for next generations.

Our preferred plan for the period 2020 to 2025 includes a mix of demand management initiatives such as leakage reductions and an ambitious water efficiency programme. During the period 2025 to 2045 we will continue our demand management initiatives to achieve further leakage and water efficiency savings. However, by this stage we will need additional water supply options to meet the increase in shortfall of our supply demand balance.

Several of the options within our preferred plan come directly from our engagement with third parties, for instance the regional transfers that resulted from our participation in WRSE. Other options, such as catchment management, rely upon our ability to work with stakeholders, or as with our water efficiency option, we rely on our ability to engage and influence customers' water use behaviour.

In our water resource zone 1 (Tunbridge Wells) we are developing regional water transfer schemes such as importing water from Sutton and East Surrey Water (2042) to our WRZ1 area (Tunbridge Wells) and a targeted catchment management interventions programme in the Pembury area (2034).

South East Water have now reviewed the plan and would like to comment that it is important and agree with Tunbridge Wells Borough Council on the points raised as part of the Local Plan strategic objectives

and would like to add that water efficiency should be a key aspect to be promoted to existing buildings and new buildings, either residential or non-residential across the Council as part of these objectives.

We welcome the changes and the introduction of a new target of 110 litres per person per day instead of the current mandatory target of 125 litres per person per day within Policy EN 24 -Water Supply, Quality, and Conservation. We recommend the Council to be ambitious and try to achieve lower targets as soon as regulation permits and to include a lower optional standard which could be trialled in selected new developments. South East Water fully support this policy as we are keen to collaborate with Tunbridge Wells Borough Council and understand how this policy will be implemented, monitored and the potential benefits of it. South East Water consider that it is important that the Council and developers liaise with South East Water to ensure the timely delivery of water supply infrastructure that is adequate to meet future demand.

South East Water support the introduction of sustainable design standards in Policy EN 2 - Sustainable Design Standards for all residential and non-residential developments where water use standards should be a main focus for developers as well as the monitoring responsibility from the Council.

Our main areas of concern are Capel Tudeley followed by Paddock Wood. South East Water would need to supply the bulk of the water for these sites from the north, from our water resource zone 6 (Maidstone) to our water resource zone 1 (Tunbridge Wells). Our preferred plan for the period 2020 to 2025 includes a new water supply option in WRZ6 to construct a new water treatment works at the former Aylesford Newsprint site. We are planning to increase the transfer capacity from AylesfordNP to Kingshill first (Water Resources Mains scheme) but will also require reinforcement from Beech reservoir down to Paddock Wood.

We would then connect across to the Tudeley development from there by laying new mains. The development in East and Central Paddock Wood will be easier to support from the existing network but a shorter length of main may be required for those on the East. This will require early confirmation that development is progressing.

South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure.

South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators.

South East Water would like to be kept updated with any developments relating to the Tunbridge Wells Borough Council Local Plan and we welcome the collaboration with the Council. We look forward to working with Tunbridge Wells Borough Council to ensure that drinking water supplies remain protected in the area in the future.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southern Water Services Plc
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Southern Water Services Plc [REDACTED]
Comment ID	PSLP_1216
Response Date	03/06/21 15:31
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Southern Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes

Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Southern Water is the statutory wastewater undertaker for Paddock Wood and Capel. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Proposals for 3,490-3,590 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019).

In addition, our assessments have revealed that Southern Water's underground infrastructure crosses the site. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

This site incorporates a few of Southern Water's Pumping Station (WPS). In order to mitigate any noise and/or vibration generated by their essential operation, a 15 metre gap between the pumping station and any residential dwelling would be required. This will also help ensure Policy EN27 bullet 2 of the Tonbridge Wells Local Plan is adhered to.

In addition, we note that this site is incorporates Paddock Wood Wastewater Treatment Works (WTW), which is owned and operated by Southern Water.

Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However, unpleasant odours inevitably arise as a result of the treatment processes that occur. New development must be adequately separated from WTWs to safeguard the amenity of future occupiers. This is in line with paragraph 180 of the National

Planning Policy Framework (NPPF, 2018), which states that 'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on [...] living conditions' and Paragraph 182 which states 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities [...] Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.'

In addition, paragraph 7.6.5 of the Kent Waste & Minerals Local Plan 2016 (p106) states that 'certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with [...] waste management activities which are industrial in nature.' Policy DM 8 further stipulates 'Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.'

Southern Water believe that development that is sensitive to odour should only be permitted if the distance to the works is sufficient to allow adequate odour dispersion. We would expect an assessment to be carried out that would demonstrate that there would not be a detrimental impact on amenity by reason of odour.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In consideration of the above, we recommend the following criterion is added to Policy STR/SS 1

Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

Layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes

A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout.

The development layout must provide sufficient distance between Paddock Wood Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Christine Spicer [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Christine Spicer [REDACTED]
Comment ID	PSLP_983
Response Date	02/06/21 19:15
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Christine Spicer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Paragraph 1

I question the need for so much building on Green Belt land.

Paragraph 2a

The table on page 24, paragraph 2.16 of the PSLP shows that between 2020 and 2038, the projected increase in population is from 118848 to 125003 people. This is an increase in population of 6155 people. So why, on page 36, paragraph 4.16 does the table say at the top that the housing need is 12204 dwellings? Specifically for Paddock Wood and east Capel, why are 3490-3590 dwellings allocated?

Paragraph 2c

With fewer houses built, there would be no need for two further primary schools.

Paragraph 2d

The location of this hub is unsuitable due to poor access by active travel. It's not even in Paddock Wood!

Paragraph 3 and 12

The houses being built already are not affordable to local people. How can you ensure that local people can afford these new houses? New houses being built are not being built to high standards. How will the council enforce green building?

Paragraph 13

Flooding is a very important consideration, with Paddock Wood having suffered years of flooding misery at the hands of council and water company's inaction. Page 139 para 5.165 says

"Surface water flooding risk is not considered particularly elevated, although the local network of urban surface water drains and foul water drains has flooded in recent rainfall events"

I disagree.

I have lived in Paddock Wood for nearly 30 years and there has been regular flooding here over that time, not just recent events, particularly in Church Rd, Maidstone Rd and the houses in the Allington Road area. Many of these are flash floods and have been exacerbated by further development since the mid 1990s. Any plan needs to specify flood mitigation to be better than for a "one-in-100-year-plus-climate-change-allowance" flood event.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Paragraph 1

Fully examine the potential of all existing and potential brownfield sites and reduce building on the Green Belt

Paragraph 2a

Reduce the housing allocation for Paddock Wood specifically where flood risk is greatest. See below.

Paragraph 2c

Only build one school

Paragraph 2d

Locate sports hub elsewhere, possibly on the eastern side

Paragraphs 3 and 12

More social housing. Also the plan needs to be much clearer about demanding that all housing be constructed as green buildings. This particularly applies to developers such as Persimmon, whose poor handiwork and disregard for green principles can already be seen in the estate off Green Lane.

Paragraph 13

Any plan needs to specify flood mitigation to be better than for a "one-in-100-year-plus-climate-change-allowance" flood event. Thorough consultation with the EA before any consideration to build on the western parcel and land just south of the railway line.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lesley Stanley ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Lesley Stanley ([REDACTED])
Comment ID	PSLP_1312
Response Date	04/06/21 15:18
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Lesley Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Paddock Wood for 33 years. My family have lived in the area for 65 years. It takes me anything between 50 -75 minutes to get to my job in Tunbridge Wells due to traffic and congestion. This will only be made severely worse by further development at the level being considered. The current drainage and sewerage system is unable to cope with the level of housing we have now and we suffer severe flooding in the area. I also have problems getting a doctors or dentists appointment as the surgeries are at capacity for patients.

I do not believe that Paddock Wood and East Capel is the right area for the level of housing proposed. Tunbridge Wells Borough Council want to add 2060 homes to East Capel and I believe this is a completely disproportionate amount that will destroy our rural greenbelt. There has been a complete lack of interest in other areas as alternatives such as Castle Hill or Blantyre. Hundreds of acres of good quality farming land will be lost if plans proceed in East Capel.

Tunbridge Wells Borough Council acknowledge much of their borough falls under Areas of Outstanding National Beauty so limited the potential for development so that Paddock Wood, Tudeley and Capel were areas of interest. But they are not suitable at all.

Reference-Strategic Site Master Planning and Infrastructure Paper-Paddock Wood sections 4.58-4.63 acknowledges the water table is so high, flood storage solutions are limited (s4.62). It also acknowledges recent flooding of Warrington Road (s4.63) and that building is reliant on local flood defences (s4.59). Section 4.64 states known drainage issues. Despite this, global warming and rising sea levels, Tunbridge Wells Borough Council is willing to put new homeowners as well as all existing ones to even higher flood risks. Despite all the problems this will in turn, eventually cause for Tunbridge Wells Borough Council.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee Mr Andrew Stanley [REDACTED]
Email Address [REDACTED]
Address [REDACTED]
TONBRIDGE
[REDACTED]
Event Name Pre-Submission Local Plan
Comment by Mr Andrew Stanley [REDACTED]
Comment ID PSLP_1025
Response Date 04/06/21 13:13
Consultation Point Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel ([View](#))
Status Processed
Submission Type Web
Version 0.3
Question 1

Respondent's Name and/or Organisation Andrew Stanley

Question 2

Agent's Name and Organisation (if applicable) n/a

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS 1 Capel East and Paddock Wood

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Some of these comments are replicated in my submission under Policy STR/SS 3 although those are mainly by way of introduction

I have lived in Capel for 25 years and Paddock Wood for 35 years and know the area well. Accordingly, my comments are made from personal experience and knowledge of the area.

There are many reasons why this plan is ill conceived. The fundamental flaw begins with TWBC selecting sites based on the land being offered up at various times via "calls for sites" rather than seeking the most appropriate sites. The plan is then written from that perspective. Many sites were rejected for specified reasons; those reasons also apply to Capel which was selected!

The plan for Capel (in total) was not made known to the public until May 2019. It has been extremely time consuming and difficult for Capel parish residents to respond. Despite that there was a huge response to the plan at regulation 18 stage. The majority of the 2,000+ who responded to the consultation exercise, described as "the highest response to any consultation/engagement undertaken by TWBC Planning Services", objected to the plans for Capel Parish. I understand that over 95% objected to the plan and many of those participants were from outside the parish. That isn't "buy in" by the public.

I have attended in person or by Zoom all meetings relating to this matter held by TWBC. The Council has virtually ignored the opposition to Capel being unfairly/disproportionately treated and discussion has been limited to legal minimum requirements. It would be hard to detect from TWBC meetings that Capel was an issue. Regulation 18 did not resolve any issues; they were simply ignored. The Council leaders view throughout is his oft quoted "just get this through"

Throughout, the Planning Officer has stated that there is no alternative plan and Councillors have advised that it's this plan or letting the Government impose a plan. That doesn't seem much of a strategy to me!

I appreciate the Inspector considering this plan has, perhaps, a technical/legal approach but I hope that the views of ordinary people without detailed planning knowledge are properly considered. The objections to the plan and alternatives suggested have, throughout, been dismissed. The lack of any real democratic process has been alarming. We seem to have just gone through a tick box process and are otherwise invisible.

The plan is not proportionate. The rural parish of Capel with 2% of the borough's population has been allocated 45% of the entire borough housing plan; 3 times more than the largest town of Tunbridge Wells and 90 times more than the second largest town, Southborough. Many parishes with similar populations have no or minimal allocations. I understand that it is Government policy to regenerate and develop City and town centres but that is largely absent from this plan. I should also mention "local need". This may depend on the definition of local. Can so many houses be required in such a small area? Why are houses currently being built in PW being marketed in London and Hong Kong?

The most blatant and arrogant aspect is the total disregard for the parish boundary. Capel East is lumped in with Paddock Wood (PW) virtually as fact that PW will expand into and take over a significant area of land from the adjoining parish. A new floodlit sports facility for PW is included a half mile into Capel adjacent to the A228 road and would require users to drive to such facility. PW Town Council have always made it clear that they want users to be able to walk to facilities rather than drive. Capel Parish Council was not consulted; such arrogance by TWBC. I could mention the additional light pollution. It could be ventured that the late and strange choice to house a sport facility in such a location is because it's one of the possible exceptions to using greenbelt and as such can be quoted as such! (para 145 NPPF)

The boundary between PW and Capel is a Limit to Build. It was created for a purpose; to stop PW merging into Capel - specifically Five Oak Green which is the central village in the parish. This plan sees expansion almost to Five Oak Green, separated only by the A228.

The land in East Capel is greenbelt. It is approximately half a mile to the north of (& overlooked by) an AONB. The National Planning Policy Framework requires exceptional circumstances to allow building on greenbelt land and that they are fully evidenced and justified - otherwise the Metropolitan Greenbelt has no purpose. It appears that TWBC has already made the decision to remove greenbelt status as referred to in paragraph 5.160 of the Pre-Submission Local Plan - "Land to the west of the proposed extension, within Capel parish, was released from the Green Belt. The exceptional circumstances for this release are outlined in the Development Strategy Topic Paper". Again, Capel Parish Council was not consulted on this. I would also argue that there are not exceptional circumstances and that TWBC has not properly considered alternatives. It has treated greenbelt as the solution without adequate recourse to the alternatives.

It is difficult to be precise about the exact breakdown between East Capel and PW north/west new development but these proposed new communities will be separated by a rail line with an unprotected crossing. It would seem plausible that there will be a significant increase in use of that crossing which questions the decision to develop both sides of the railway.

East Capel and west PW are on the River Medway flood plain. I believe that Capel and PW are home to all of the borough's flood plain. Three times in the last 10 years the area has been subject to serious flooding; the most recent in January 2020 meant the fields were impassable. With climate change now accepted and recognised and with existing conditions certain to deteriorate it defies belief that it is the chosen site for major development when so many alternatives are available. Para 155 NPPF 2019 states "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)". No amount of "betterment" ((TWBC) can add thousands of houses to an existing flood plain and not adversely affect flooding for the area and others further down river in adjoining boroughs.

We have seen a significant increase in people using the countryside; seeking quiet open spaces. From the PW/ East Capel boundary there are immediate rural walks north, west and south. These walks will remain but only through housing estates. Anyone wishing to find peaceful walks will be required to drive elsewhere. As a very keen walker myself I know that I will not walk locally if housing is placed in this area.

The additional traffic caused by the proposed additional proposed housing in PW and Capel and current developments in PW cannot be resolved. The roads in the area cannot be adapted to cope with such a large increase in demand. I have seen the TWBC comments regarding people cycling/walking and not using cars. From parts of any East Capel development some residents will be more than a mile from PW shopping area/rail station and will not walk – many residents in west PW use cars rather than walk and they are half the distance away. There will be additional air pollution caused by such major development in a small area. Those with respiratory complaints will suffer. I need not comment further.

The rail system was at capacity pre-Covid and although no-one can predict the future it is likely to slowly return to that position with major developments along the line before Paddock Wood at Marden,

Staplehurst and Ashford (to name just three). There was insufficient parking and that can only worsen with thousands of additional houses.

Question 6

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The plan is unsound for reasons stated in Q 5 and for many other additional matters.

TWBC has not adequately considered alternative sites and dismissed many after little more than a cursory glance. It has rejected sites for a variety of reasons, many or all of which also apply to Capel!

As an example, of which there are many, – the plan rejects land north of Badsell Rd, Five Oak Green (Capel) because it is greenbelt, greenfield and noise near rail line. This site is within the village and would be considered as infill. The site at East Capel sites is greenbelt, greenfield and adjacent to the rail line - See appendix H – page 311 of Sustainability Appraisal.

Such inconsistencies exist throughout the plan

TWBC has not fully explored brownfield sites and has dismissed some on spurious grounds. Considering the numerous negative aspects relating to Capel it is difficult to understand how a large brownfield site at and adjacent to the former Blantyre Prison can be quickly rejected together with a greenfield site surrounding the area. The site is government owned and non AONB or greenbelt.

Capel Parish Council does support a development at Castle Hill which is located to the west of and with easy access to the A21 and to the north of industrial units at North Farm. This remains within the Capel parish boundary and also far exceeds a proportionate number of houses in the parish. This was rejected by TWBC. The concerns were that the area is an AONB and that Natural England objected. However, TWBC has granted planning permission for a business park in the same area at Kingstanding Way. TWBC also supports a re-routing of the A228 through AONB and greenbelt. It is apparent that TWBC simply amends its argument to suit itself; effectively arguing in opposing directions at the same time.

The density of housing at many of the sites questions the lack of adherence to the NPPF. Paragraph 123 states –“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.

TWBC has not followed this advice and has generally adopted national planning guidelines of 30 properties per hectare thereby ignoring its own claim of shortage of suitable land! By increasing density levels TWBC could meet its own housing target on brownfield and greenfield sites and have no need to encroach on any greenbelt land. It is also anomalous that TWBC can claim a lack of land outside AONB/Greenbelt yet still decide to plan for more houses than it is legally required to and to offer to take some of a neighbouring borough's complement.

In my view the density of required housing is linked to the population forecast over the same period as the plan. The population under 65 is scheduled to fall over the planning period and increase over that age. An ageing population want smaller properties, residential or assisted care. Looking at building

densities proposed that is not the property that is proposed in this plan. It also fails to account for properties becoming available as the elderly downsize or move into the aforementioned care.

20% of the borough is non-designated yet very little of the proposed development is in that area. The old cinema site in Tunbridge Wells has been derelict for 20 years. There are other neglected areas.

There are many examples of this plan being manufactured around land being offered in the right quantities. Despite the length of the various reports this is a lazy plan which doesn't hold up when opened to detailed scrutiny. It falls down on all or most of the requirements of NPPF -section 11, paragraphs 122 and 123 being examples.

The Pre-submission plan does not, in my opinion, meet the requirements of the NPPF and does not evidence the exceptional circumstances required to develop the land at East Capel. To plan such a major development in the borough in a small rural area on the only flood plain seems perverse.

Question 7

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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The estimated cost of the Local Plan is £339m with 102 costings yet to be agreed (infrastructure Delivery Plan -March 2021). In effect this is simply an unknown total cost. This results in an incredible risk depending on the viability of developers and funds available from local authorities. As we know with estimated costs, these will rise significantly by the time any work commences and considerably more as any project moves forward.

The cost of the plan is a calamity waiting to happen.

A significant reduction in costs can be achieved by using existing infrastructure which could be vastly reduced by utilising existing roads such as the A21 and developed areas around North Farm, Pembury Road and Longfield Road.

There is only minor reference to development within/regeneration of the two major towns in the borough, Tunbridge Wells and Southborough.

TWBC should look again at brownfield and other sites and apply detailed sustainability tests to those. The report discloses a distinct lack of testing of many potential sites, many ruled out for the same reasons that Capel was "ruled in".

TWBC has completed a Sustainability Appraisal for this site based on assessing and determining a score against 19 sustainability objectives. Scoring for each of the 19 objectives is informed by between 2 and 5 detailed and specific questions. In total there are 62 sub-questions based on a set of specific criteria. By going through this process it should provide a reasonably objective and transparent sustainability appraisal for each site.

TWBC has completed a sustainability appraisal for East Capel/Paddock Wood. The assessment is at the 19 strategic objective level – and doesn't address the sub-set questions. This is unsatisfactory considering how important the outcomes are for the borough and its neighbours!

As far as I'm aware sustainability appraisals have not been undertaken (even at the top strategic level) for the other sites as they were quickly ruled out.

I believe this to be a major flaw in TWBC assessments and adds further weight to the view that a sustainability assessment has not been adequately completed.

How can it be sustainable to put 6,000 houses in the borough's only flood plain? The NPPF is clear in the need to avoid areas subject to regular flooding. Climate change confirms that this will get worse. Throughout the report and its many referenced supporting documents there is a never-ending reference to Masterplanning which is clearly the get out of jail card for all problems. It may be a worthy thought

but it isn't the answer to the many failings of this lengthy and detailed Pre-submission plan.

In my view there is nothing that masterplanning can do with a plan that is ill conceived. I am surprised that with such masterplanning at the forefront, the Planning Officer has advised throughout that there is no back-up plan! So, does that mean entirely starting again? That does not suggest the Council is prepared to listen to any significant extent. All organisations have back-up plans on major projects and often more than one.

This plan has the hallmarks of a project which had the aim of just getting a plan with enough houses to appease government pressure and remove pressure from TWBC. I could be wrong.

It is extremely difficult from reading the documents to determine the extent of and cost of affordable housing. Irrespective of where development eventually takes place. I have real concerns that that developer profits will overcome the planning system.

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Roger Stanley [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Hadlow Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Roger Stanley [REDACTED]
Comment ID	PSLP_1712
Response Date	03/06/21 19:32
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Roger Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

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- . It is not effective
- . It is not justified

Question 5

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Tunbridge Wells Borough Council Local Plan

As a layman I cannot pretend to understand the technicalities of the SWECO report concerning the TWBC Local Plan and its implications for Capel/Tudeley in particular, and the consequent significant impact on the residents of the neighbouring Tonbridge and Malling Borough Council area.

I feel the duty to co-operate with neighbouring TMBC is clearly not evident when the site of Capel and Tudeley was chosen for this development.

Tonbridge will clearly be the nearest major town and will suffer all the major resulting congestion from the additional traffic flows, together with the implications for the education, health services and other amenities, which are already under tremendous existing pressure.

For the residents on the Hadlow/Golden Green side of the River Medway the half- baked (no I correct myself – I think its fully baked) suggestion that the Hartlake Road /B2017 should be closed to through traffic would be an act of complete lunacy, turning a journey into Tonbridge or Tunbridge Wells into a nightmare.

I have used the Hartlake Road for commuting to work in Tonbridge and Tunbridge Wells since the mid 1960's and can assure you that without this road I would have been driven insane long ago. Any military man will tell you that the key factors if there is a major river in the area are the bridges which cross it. For residents on the Hadlow side of the river

Hartlake Bridge is a vital artery in any journey to Tonbridge or Tunbridge Wells or beyond. The current Hartlake Bridge was rebuilt in 2005 at a reputed cost of two million pounds; this would seem to be a complete waste of public money if this proposal is approved.

The A26 from Hadlow to Tonbridge in the morning and afternoon/evening peak times is virtually grid-locked with vehicles stretching from Tonbridge to sometimes Three Elm Lane. Any local people would automatically use the Hartlake road as an alternative. The only other alternatives are the bridges at East Peckham which involve lengthy journeys on the side roads or via Seven Mile Lane. Obviously this adds to the pollution created by the extended car journeys, not a positive step when we are being urged to reduce our Carbon footprint.

On the occasions that Hartlake Road has been shut for repairs or floods the resulting tailbacks from Tonbridge have been catastrophic to journey times. It will be the residents of TMBC living on the Hadlow side of the Medway that will feel the real impact of this proposal and I think that TWBC have given this scant regard.

Local knowledge is the key, unfortunately I don't have any faith in any outside consultants bought in at great expense to advise organisation how to run their affairs or businesses. I expect the traffic surveys were conducted at periods when the school were on holiday or at non-peak hours.

If Hartlake Road is closed the commuting traffic into Tonbridge on the A26 will doubtless tail back to Hadlow village and beyond.

I feel I should mention schools for which Tonbridge has such a high reputation. High quality school such as Judd; Tonbridge Girls Grammar; Weald of Kent; Hayesbrook and Hillview, also the private schools at Somerhill are all situated on the South side of the river Medway and considerable traffic is generated during the school run periods by residents of the TWBC area.

These people will not be inconvenienced in the slightest by the increased journey times and stress experienced by people living north of the river in Tonbridge, Hildenborough, Hadlow or Golden Green, trying to get their children to school, if Hartlake Road is closed to through traffic.

Another example of the ill thought-out policy of situating the development in the Capel/Tudeley area with no consideration to co-operation with the residents of a neighbouring authority.

TWBC seem to think that pushing development to the outer fringes of their boundaries is the way forward. A glaring example of this is the excessive and continuing overdevelopment of Paddock Wood. This has had a major negative impact on road congestion to the Tonbridge area. Developing infrastructure before massive building developments take place seem to be anathema to TWBC.

I worked for a Tunbridge Wells printing company in Longfield road from 1968 until 1985, TWBC attitude appeared to be "Oh, its Industry, shove it next to the Sewage Works and the Refuse Tip, with access via a road through a Council house estate and another not much more than a farm track via a single carriageway railway bridge at High Brooms, which incidentally is still in use as one of the access routes to the Longfield Road Industrial Estate. It's nice to know TWBC haven't changed!

Of course TWBC would reap the benefits of 4000 new households Council Tax, while TMBC would reap all the congestion and aggravation. Seems a fine example of co-operation and fairness.

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Progress seems to dictate that some development must take place, in my opinion that should take place in what is known as the Castle Hill scheme. A site nearer to Tunbridge Wells, with direct access onto the newly upgraded A21, with a railway station at High Brooms and good access to Tunbridge Wells Hospital and the schools at Tonbridge...

This site should be considered as a replacement for the Capel/ Tudeley scheme as it avoids the destruction of the beautiful village of Capel and the surrounding area and largely negates the problems of lack of infrastructure.

Also, I understand the same landowner owns large tracts of land on both sites so he won't feel out of pocket with the developers.

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Supporting Information File Ref No: SI_6a-b

Comment

Consultee	Tara Stanley [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Tara Stanley [REDACTED]
Comment ID	PSLP_131
Response Date	03/06/21 20:41
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	flooding1.jpg flooding 2.jpg (1)
Question 1	
Respondent's Name and/or Organisation	Tara Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1	
Question 4	
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Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

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I have been a resident of Paddock Wood my whole life (33 years). Most of my family and my friends reside in Paddock Wood and East Capel too.

Over recent years I have noticed how traffic congestion has increased severely, causing me daily delays and issues. I have noticed the GP surgery struggle with surges of new patients creating long waiting times for appointments, treatments and even blood tests. I have had a long term illness and have seen first hand how Paddock Wood health surgery has become overwhelmed with numerous GP's unable to take on new patients. This is without the proposed increase in housing and the large amount of people who would come with this. I have also seen how flooding devastates Paddock Wood, East Capel and its surrounding areas. The land between housing leading up to Five Oak Green has frequently been unwalkable with severe and repeated flooding issues.

I have been concerned about the proposals for numerous reasons including the lack of infrastructure to support the developments. I see Paddock Wood and East Capel struggling with its numbers already, with a lack of school places, lack of GP and dental availability. I have concerns over how much worse the traffic can possibly get with the possibility of thousands more cars on the road locally. I feel the proposals will create Paddock Wood and Capel into one large urban sprawl, ruining its beauty. Our beautiful green spaces will be stamped out, along with its bio-diversity- leaving us with an over-populated area, unequipped to cope or support its increased numbers and losing 600 acres of greenbelt land. Paddock Wood and East Capel's flooding issues will be worse than ever as the development is entirely on a flood plain. There has been a lack of engagement with the public response to Reg 18, and it has been clear this this has been a widely unpopular proposal to residents for all of the above reasons. 97% opposed the plans.

Tunbridge Wells Borough Council is set to get all the council tax from the proposed housing whereas Tonbridge and Malling will get nothing but an increase in issues regarding traffic, flooding and shortages in education and medical facilities. The council leader told Save Capel -'you will never win'. As a resident, I feel as though our opinions simply aren't being considered.

I do not believe that East Capel is the right area for the level of housing proposed. Tunbridge Wells Borough Council want to add 2060 homes to East Capel and I believe this is a completely disproportionate amount that will destroy our rural greenbelt. There has been a complete lack of interest in investigating other areas as alternatives such as Castle Hill or Blantyre. Hundreds of acres of good quality farming land will be lost if plans proceed in East Capel. Paddock Wood and Capel will be joined together by the housing eradicating all our beautiful green areas. I consider this area to be beautiful because of our green areas which will be lost and replaced with housing for people in an area that lacks the infrastructure to support them.

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Other areas such as Castle Hill and Blantyre have not been given adequate consideration as locations for proposed housing.

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If you would like to attach a file in support of your comments, please upload it here. [flooding 2.jpg \(1\)](#)

If you would like to attach a file in support of your comments, please upload it here. [flooding1.jpg](#)

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Comment

Consultee	Andrew Sweeney ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Andrew Sweeney ([REDACTED])
Comment ID	PSLP_1350
Response Date	04/06/21 16:28
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Andrew Sweeney
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Strategy for Paddock Wood, including land at east Capel

Question 4

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Flood Risk

There was a significant flood event in 2013/14 affecting Tonbridge and Golden Green.

Development of East Capel is entirely on the flood plain.

HOW can development of such an area even be considered both from a common-sense point of view and in light of Govts concern over sustainability and global warming.

These proposals are surely a future scandal if allowed to proceed.

Finally, it should be noted the South-East of England is prone to a lack of water; with the reservoir at Bewl Water frequently suffers low levels in summer. Has proper research to be done to evaluate the impact of a new town on supply?

Rail Transport

A huge expansion of housing at Capel and Tudeley, along with other housing development downline in Kent will put significant demand on peak time train services. It is unclear if Tudeley will have a station and if not then of course commuters will be drawn to Tonbridge via road.

Tonbridge station parking is already limited and constrained so thousands more commuters and or vehicle movements really could be disastrous.

Schools

East Capel has a 200 student primary school which already causes severe congestion at the location.

These proposals seek to add 2000 pupil secondary school.

This is not much improvement on their previous proposal.

Process

I question the integrity of this process.

TWBC has 20 wards and is seeking to put half of their proposed new housing in 1 ward, obliterating the existing local communities, green belt land materially impacting Tonbridge which already suffers from severe peak time congestion on road and rail infrastructure.

Has TWBC worked to identify brownfield sites to the same extent as they have targeted greenfield sites for development? Despite the assertion that no other brownfield sites exist some might suspect TWBC prefers to deal with a single transaction, rather than engage in the hard work to identify multiple but more suitable locations.

Para 137 NPPF requires local planning authorities to “examine fully all other options for meeting its identified need for development” before concluding whether exceptional circumstances exist to justify changes to Green Belt boundaries.

Does this draft plan fail this test?

The land to be used is Green Belt that lies adjacent to Kent's Area of Outstanding Natural beauty (AONB) and in close proximity to at least one Area of Ancient Woodland. To use Green Belt land, there must be “exceptional circumstances”, and housing need is NOT sufficient to overrule currently protected Green Belt.

It is understood that the housing need figure is not a mandatory target and the NPPF is clear that only in exceptional circumstances may a Green Belt boundary be altered, through the Local Plan process.

Consequently, Government-imposed housing targets are disproportionate for a borough and parish with such a high proportion of Green Belt and/or AONB land.

Sevenoaks Council has pushed back on this external imposition of housing targets from central government which in any case, uses out of date 2014 ONS data, not the updated 2016 numbers.

Finally, TWBC received extensive comments objecting to the local plan in 2019 and apart from dropping its grossly ill-conceived proposals for another school in Tonbridge has ignored the responses and is just carrying on trying to bludgeon its way through.

It seems TWBC is simply paying lip service to “community engagement” but I suppose as the communities affected are not voters in TWBC they simply don’t care.

In summary

Unwarranted proposals to build on green belt and on flood plain.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_121

Comment

Agent	Georgina Illsley [REDACTED]
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Consultee	[REDACTED]
Company / Organisation	Tarmac Trading Ltd.
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Tarmac Trading Ltd. [REDACTED]
Comment ID	PSLP_1899
Response Date	04/06/21 16:55
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.9
Files	PSLP_1899 & 1905 Heaton Planning for Tarmac Trading Ltd. Representation with Appendices Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Tarmac Trading Ltd.
Question 2	
Agent's Name and Organisation (if applicable)	Heaton Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR/SS 1 and EN 9 - please see Comment Numbers PSLP_1899 and PSLP_1905]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TUNBRIDGE WELLS LOCAL PLAN REGULATION 19 PRE-SUBMISSION CONSULTATION - REPRESENTATIONS ON BEHALF OF TARMAC TRADING LIMITED

We are writing on behalf of Tarmac Trading Limited (Tarmac) with regard to their land interest north west of Paddock Wood. The purpose of this letter is to outline the availability and suitability of the site for consideration by the Borough Council and local developers in securing potential offsetting/off site biodiversity net gain contributions in coordination with nearby land which is proposed to accommodate strategic growth as set out within the emerging Local Plan.

We would also like to comment on the consistency of proposed policy EN 9 against the National Planning Policy Framework (NPPF) in relation to the locational hierarchy for biodiversity net gain.

Background

The site lies to the north west of Paddock Wood within the wider extent of Stonecastle Farm Quarry, an existing sharp sand and gravel quarry which straddles the administrative boundaries of Tonbridge and Malling and Tunbridge Wells.

Tarmac's freehold land interests in this area extend to ca. 80 hectares (Ha); a map showing the extent of Tarmac's freehold interest is enclosed at Appendix 1. The wider extent of Tarmac's freehold interest contains operational areas associated with Stonecastle Farm Quarry plant site. The operational areas are illustrated on drawing reference SC/003/A enclosed at Appendix 2. These areas are to be retained in operational use over the plan period of the Tunbridge Wells Pre-submission Local Plan (the 'Plan').

The site subject of this letter is promoted to highlight its potential for biodiversity net gain contributions. The site extends 22 Ha across the north east of the freehold interest. It includes Ancient Woodland (1.8 Ha) and National Forest (5.9 Ha) with designated Priority Habitats (7 Ha) and bare ground surrounding three former silt lagoons.

The site hereby promoted is shown at Appendix 3.

[TWBC: for appendices, please see supporting documents]

Policy and Legislation

The Plan sets out the overarching development strategy for the Borough covering the period between 2020 and 2038. One of the key challenges identified in the Plan is meeting the housing needs of the Borough, which has been assessed in line with national policy using the standard methodology at approximately 678 per annum, equivalent to 12,200 additional homes over the Plan period as a minimum.

Combined, the designated High Weald AONB and Metropolitan Green Belt cover approximately 75% of the Borough. These designations are instrumental in determining the development strategy and location of future growth within the Borough. There is an identified need to deliver a minimum of 12,200 additional homes over the Plan period

The Plan sets out two strategic growth areas which comprise a strategic extension to Paddock Wood including east Capel (Policy STR/SS 1) and a garden village at Tudeley (Policy STR/SS 3). Paddock Wood strategic growth area is located on existing agricultural land and woodland and is facilitated through the release of ca. 150 Ha of Green Belt land. The proposed extension to Paddock Wood comprises 3,490-3,590 new dwellings, considerable employment use, and associated education, leisure, retail, and health facilities and is to be delivered using garden settlement principles.

Policy STR/SS 1 (The strategy for Paddock Wood, including land at east Capel) requires certain environmental enhancements to offset the overall impact of development in that location. These include:

- . Creation of a Paddock Wood 'Wetland Park' to the north of the western parcel to deliver flood water attenuation and new wetland habitat, and allowing for informal recreation via a network of footpaths and boardwalks;
- . For development on land to the west, to provide compensatory improvements to the Green Belt; and
- . Provide a scheme for the management and funding for green spaces and green infrastructure for each parcel of land, for both amenity and biodiversity for the lifetime of the development.

The Plan also introduces a requirement for all development to contribute towards delivering net gains for nature, in accordance with the emerging Environmental Bill. The Environmental Bill will, through various mechanisms, provide a new framework for improving the natural environment. The 'biodiversity gain objective' set out in Part 6 (supporting Schedule 14) is one of these mechanisms, whereby the biodiversity attributable to developments covered by the Town & Country Planning Act (1990) will be required to exceed the pre-development biodiversity value of the 'onsite habitat' by at least 10%, which is defined as the habitat on the land to which the planning permission relates.

Strategic Objective 8 of the Plan seeks to 'conserve and enhance the natural environment' and achieve 'net gains for nature'. Biodiversity compensation will be achieved, if required, through a combination of on-site provision, off-site contribution or through purchasing biodiversity credits. Part 6 (supporting Schedule 14) section 93 sets out the 'Biodiversity gain site register' which will be used by Local Planning Authorities (LPAs) when off-site biodiversity compensation is required. The Government register will set out compensation receptor sites to be used by developers and the LPA to achieve biodiversity net gains through development.

Proposed Policy EN 9 of the Plan (Biodiversity Net Gain) sets out the criteria for development to achieve biodiversity net gain. All major development (10 dwellings plus, 1,000 sqm plus of floorspace, new build, or conversion or outline proposals capable of accommodating either) is required to provide mitigation, compensation, and enhancement measures for biodiversity on or adjacent to the development site.

The National Planning Policy Framework (NPPF) is the overarching planning policy guide for England and provides guidance on the principles required when determining planning applications. Paragraph 175 (a) states that 'if significant harm to biodiversity resulting from a development cannot be avoided..., adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'.

Sustainable development is achieved by balancing economic, social and environmental objectives (NPPF Para. 8). In order to achieve the levels of housing and economic growth anticipated over the plan period, it is important to ensure that planning policies provide adequate flexibility to ensure that development is achievable. It is preferable to provide biodiversity offsetting in proximity to the development site, however, the overall objective is to achieve a net gain in biodiversity within the LPA.

Part 1 (a) of proposed Policy EN 9 states that the location and type of net gain shall be provided in accordance with 'the supporting text or as otherwise required by supplementary planning guidance'. Paragraph 6.135 of the supporting text to proposed Policy EN 9 states that, for major development, off-site proposals will only be considered in 'exceptional circumstances' and in the interests of biodiversity. We do not consider that the requirement for 'exceptional circumstances' is consistent with the approach at paragraph 175 (a) of the NPPF.

The approved Defra Biodiversity Metric (2019) used to calculate biodiversity net gain has an in-built locational hierarchy whereby if habitat creation, enhancement and accelerated succession is undertaken off-site, an additional spatial risk multiplier is applied. The offsite risk multiplier seeks to ensure that compensation habitat is provided locally to where biodiversity losses occur. Where off-site compensation is local, within the local planning authority area (LPA) or the same National Character Area (NCA), it is considered acceptable and no off-site risk multiplier is applied.

We are supportive of providing compensation habitat locally within the LPA/NCA.

Key Opportunity for Net Gain at Stonecastle Farm

As previously set out, the site comprises ca. 22 Ha and includes an area of Ancient Woodland and National Forest with Priority (Deciduous Woodland) and bare ground surrounding three former silt lagoons. The bare ground at present has low value for biodiversity.

The site falls within an area identified for Network Enhancement (Zone 2) which is defined by Natural England as "land connecting existing patches of primary and associated habitats which is less likely to be suitable for creation of the primary habitat. Action in this zone that improves the biodiversity value through land management changes and/or green infrastructure provision can be targeted here." 1 (emphasis added)

The site is located 500 m north of the village of Whetsted and ca. 1.5 km north west of the existing settlement of Paddock Wood. The A228 Whetsted Road separates the site from the settlement of Paddock Wood. The A228 Whetsted Road will form the new western settlement boundary of Paddock Wood taking into consideration the strategic growth site STR/SS 1. Therefore, the site will be located less than 500 m from the new settlement boundary of Paddock Wood. The site is therefore in close proximity and can, if required, accommodate biodiversity enhancement to offset potential biodiversity losses as a result of the proposed strategic-scale development at Paddock Wood, or indeed anywhere else within the Borough.

The site is located within the Metropolitan Green Belt and contains areas of Ancient Woodland and Priority Habitats which are protected under proposed policies STR 9 (Green Belt), EN10 (Protection of designated sites and Habitats), and EN13 (Ancient Woodland and Veteran Trees). The safeguarded areas are illustrated on Inset Map 4 of the Plan (Paddock Wood). Proposed policy STR 9 (Green Belt) supports improvements to the environmental quality and accessibility of the Green Belt through developer contributions.

Tarmac hereby seeks to promote the site for biodiversity offsetting in accordance with the emerging Environment Bill and planning policies set out above. Promotion of the site for biodiversity enhancement is considered to support the environmental objectives of the emerging Plan and assist in the sustainable development of strategic growth site STR/SS 1. Off-site biodiversity offsetting is the least favoured mechanism to achieve net gains through development. However, given the proximity of the strategic growth site (STR/SS 1) to our client's land, it is considered that the biodiversity offsetting in this location is supported through proposed policy EN 9 (Biodiversity net gain).

The proposed restoration strategy demonstrates the ability of the site to achieve a high-quality scheme that provides a wide range of habitats to support biodiversity gains. The size of the site provides further opportunities to establish a wide variety of environmental improvements on the wider scale through off-site compensatory measures.

One of the two key locations for sustainable growth within the Plan is proposed in close proximity to the site as an extension to Paddock Wood (Policy STR/SS 1). Development of the site is governed by various environmental parameters including requirement for a Paddock Wood 'Wetland Park', compensatory improvements to the Green Belt and a scheme for the management and funding for green spaces and green infrastructure. Furthermore, proposed policy EN 9 requires all major development to provide mitigation, compensation, and enhancement measures for biodiversity on or adjacent to the development site with off-site proposals considered in exceptional circumstances.

In addition to proposed strategic growth at Paddock Wood, there are a number of consented development sites at Mascalls (476 houses), Church Farm (300 houses) and Residential and Secondary Expansion site (350 houses). Development coming forward on these sites, in combination with the strategic growth sites at Paddock Wood and Tudeley, strengthens the need to provide mitigation, compensation, and enhancement measures for biodiversity on or in close proximity to these development sites.

Our client's land is available, well related to the proposed strategic growth site west of Paddock Wood and extends across a large area of designated Green Belt land where improvements to environmental quality are highly supported through the Plan.

Concluding Remarks

We would welcome consideration by the Council of the potential for our client's land north west of Paddock Wood to be used as a site for potential biodiversity offsetting to enhance biodiversity within the Borough, in line with the contents of the emerging Plan and the approach set out in the Environment Bill. The strategic location of our client's landholding in close proximity to the strategic growth site surrounding Paddock Wood strongly supports use of the site for off-site biodiversity compensation.

We would be delighted to discuss a holistic future development strategy for the site which mutually supports the Council's growth aspirations for Paddock Wood, east Capel, and Tudeley, as well as the environmental gains required through emerging legislation and planning policy.

We would also like to highlight the in-consistency of proposed Policy EN 9 against the NPPF in relation to biodiversity net gain and the potential limitations this places on achieving the required levels of development.

We trust that these representations are of benefit to the Council in refining the emerging Local Plan and its associated evidence base. Should any matters require clarification we would be delighted to assist. Likewise, we look forward to further discussions to explore the timely delivery of compensatory environmental uses at the site.

1 National Habitat Network Maps - User Guidance v.2 (Natural England) May 2020

[TWBC: for full representation with appendices, please see supporting documents]

For office use only

New Site Submission? Enter site address

Stonecastle Farm Quarry Plant Site (site available for biodiversity net gain)

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here.

PSLP 1899 & 1905 Heaton Planning for Tarmac Trading Ltd. Representation with Appendices Redacted.pdf

Supporting Information File Ref No: SI_99

Comment

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Consultee	[REDACTED]
Company / Organisation	Taylor Wimpey UK Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Taylor Wimpey UK Ltd [REDACTED]
Comment ID	PSLP_1819
Response Date	04/06/21 09:57
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1772-1828 (not inclusive)_Turley for Taylor Wimpey_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Taylor Wimpey
Question 2	
Agent's Name and Organisation (if applicable)	Turley
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against the Pre-Submission Local Plan as a whole, Policies STR 1, STR 7, STR/SS 1, STR/SS 3, STR/CRS 1, AL/CRS 3, PSTR/HO 1, EN 2, EN 9, EN 14 and EN 26– see Comment Numbers PSLP_1772, PSLP_1813, PSLP_1818, PSLP_1819, PSLP_1820, PSLP_1821, PSLP_1823, PSLP_1824, PSLP_1825, PSLP_1826, PSLP_1827, and PSLP_1828. The full representation has been attached as Supporting Information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

No

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TUNBRIDGE WELLS PRE-SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION LAND WEST OF FRYTHE WAY, CRANBROOK (SHELAA REF: 25)

Thank you for the invitation to comment on the above consultation. We write on behalf of our client, Taylor Wimpey UK Ltd, who control land west of Frythe Way, which abuts the south eastern edge of Cranbrook (SHELAA Site Ref: 25).

We have examined the Pre-submission Local Plan (PSLP) and conclude that as drafted it is neither legally compliant, nor sound. The Council's Sustainability Appraisal (TWBC, 2021) concludes Option 13 (The Pre-Submission Local Plan) to be an 'appropriate strategy'. We are unable to reach the same conclusion, as the SA has not first taken into account 'reasonable' alternative strategies, contrary to paragraph 35 of the NPPF and the corresponding SEA Regulations.

We also conclude that Tunbridge Wells Borough Council's (TWBC) statutory Duty to Cooperate under Section 33A of the 2004 Act has not been discharged. The Council has not in our view demonstrated that there has been active, constructive or on-going engagement with adjoining authorities, including Sevenoaks District Council (SDC), in respect of known unmet housing needs. Nor has an effective

strategy been put in place between the authorities to address such needs. The justification drawn from the SA process that TWBC are unable to assist SDC is contested. Distributing such unmet needs solely in line with SA Option 9 (Dispersed Countryside) is not a reasonable alternative in our client's opinion. It serves only to support a pre-determined outcome to select Option 13 (Pre-Submission Local Plan) as the 'appropriate strategy'.

In addition, the site selection process that flows from the SA (TWBC, 2021) and SHELAA (TWBC, 2021) contains notable errors and inconsistencies, which appear to have contributed significantly to the omission of more suitable and sustainable sites in favour of those proposed in the PSLP.

The quantum of growth proposed in the PSLP, and the over reliance placed on two large strategic sites to deliver between 67-69% of newly allocated supply is also questioned. In relation to the first, we contend adjustments are required to the overall housing requirement to both reduce the evident shortfall in affordable homes, and to assist adjoining authorities with known and growing unmet housing needs. We contend this is particularly important given three of the adjoining LPAs have been reported on as failing to discharge their statutory duty to cooperate, with their Local Plan's either withdrawn or delayed as a consequence. In addition, the Secretary of State for Housing, Communities and Local Government has confirmed there are significant unmet and mounting housing needs requiring collaborative action with London within the next five years. All of which highlights how important it is for the emerging TWBC PSLP to be positively prepared.

Turning to the second issues, we outline concerns over the justification for, lead in times and annual yields purported for the two strategic sites. It is our contention that these are unrealistic, and are contrary to leading evidence bases published for sites of this scale. As a consequence, we suggest the quantum of growth envisaged will not come forward as fast or at the rates envisaged, nor will it be delivered within the plan period. We accordingly recommend additional allocations are made to compensate for this shortfall, in sustainable locations that are capable of being delivered in the first five years of the plan period. We outline concerns in relation to TWBC's land supply assumptions in this period to evidence such a need.

We also outline concerns over the quantum of growth directed to certain locations and settlements. We contend these proposals are unlikely to support the climate change objectives set out in Policy ST7 of the PSLP. Our client supports the justification for and benefits of strategic growth at Cranbrook, ranked 2nd in the Settlement Role and Function Study (TWBC, 2021). In this respect, our client's site (Site 25) represents a modest proposal for 70 homes that is well contained by woodland, is partly within the settlement, has good accessibility to the high street and other facilities by foot (far better than some of those chosen for allocation), and no other overriding constraints to development. We set out in detail the factual errors, inconsistencies and missing evidence in our comments on the SA and SHELAA process below, which has thus far led to the omission of this site for allocation.

Our client continues to respectfully purport the justification for and benefits of this site's allocation. This includes the sharing of an emerging vision for the future of this site (See Document A); and confirmation from Kent County Highways there are no overriding highway constraints to the delivery of the site (see Document B). The land required to deliver the proposed development, its accompanying infrastructure and community benefits is in the control of Taylor Wimpey. It is available for development now, can be delivered well within five years and is considered a suitable and logical location to direct some of the future growth needed at Cranbrook. The emerging vision document appended confirms there to be no known overriding constraints to the delivery of these proposals.

Given the nature and detail of our representations, specifically in relation to the plans legal compliance and soundness, we would respectfully request attendance to participate in the examination of the PSLP. In the interim, the following representations are made to assist the Council and Inspector in their examination of the PSLP.

Soundness

STR/ SS1 – Strategy for Paddock Wood, including land at east Capel

For the avoidance of repetition, we refer to our comments / objections to Policy STR1 in relation to the overly optimistic capacity, lead in time and delivery rates assumed for this site. We contend the application of more realistic rates will likely result in the delivery of these sites beyond the plan period, and a consequential need to allocate additional sites to compensate for this within the plan period. In this respect, we purport the benefits and modest contribution our clients site (Site 25) can make to assist in addressing such deficits.

We trust these comments are useful and duly noted. We would welcome the opportunity to elaborate on such matters at the forthcoming Examination into the subsequently submitted version of this Plan.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Diana Tennant [REDACTED]
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Event Name	Pre-Submission Local Plan
Comment by	Diana Tennant [REDACTED]
Comment ID	PSLP_1664
Response Date	04/06/21 14:41
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Diana Tennant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Postern Lane for 28 years and we have been fortunate to benefit from the Green Belt around this area, which we very much hope will be protected as required by The National Planning Policy. In 2016 the Inspector said that there was no need to allocate any land in the Green Belt to planning as there are a number of Brown Field and alternative sites available.

The main reason for the Green Belt is to prevent urban sprawl. This plan would effectively join Tonbridge to Paddock Wood via Tudeley and East Capel.

2% of the TWBC population live in Capel Parish, with this plan, 51% of the local housing plan is forced on Capel Parish. It is on the edge of TWBC, who will receive the Council Tax and Tonbridge and Malling will have all the traffic, the residents using the station, and schools.

Building so many houses in Capel and Tudeley will cause a significant increase in traffic, as most houses would have 2 cars. There is already extreme traffic congestion on the B2017 every morning and afternoon with people going to the local schools and the station and it is often difficult to get out of the Lane on to the B2017. The many extra cars would also be detrimental to air quality.

The increased number of people using the train from Tonbridge will be unsustainable as the commuter trains are already packed. There was a suggestion that Network Rail will put in another station near Capel, but apparently they will not approve or fund a station or the disruptive work required for bridges and tunnels.

The beautiful landscape across the Medway Valley will be altered forever and for at least 15 years, it will be a construction sight, visible for miles around. A rural Parish will change to an urban one and the existing community will be overwhelmed.

Development at East Capel is entirely on a flood plain. Tudeley has a high flood risk and the water would then go to nearby towns.

Hundreds of acres of good quality agricultural land would be lost forever.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are various brown field and alternative sites which would be suitable for houses, rather than building on the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

A large part of the developments will be on the Medway Floodplain and covering good agricultural land with houses will make the Medway more liable to flood and increase the flood risk in Golden Green, East Peckham, Tonbridge and Yalding.

There will be a huge increase in air, light and noise pollution to the Low and High Weald. Many people visit All Saints Church at Tudeley with the beautiful Marc Chagall windows and this Church would be surrounded by houses instead of the lovely Kent countryside.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_125

Comment

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Event Name	Pre-Submission Local Plan
Comment by	Tesco Stores Ltd [REDACTED]
Comment ID	PSLP_1928
Response Date	04/06/21 12:25
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1921-1930 (not inclusive) MRPP for Tesco SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Tesco Stores
Question 2	
Agent's Name and Organisation (if applicable)	MRPP
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Map 27, Map 67

[TWBC: this representation has been input against Policies STR 1, STR 6, AL/PE 6, EN 15, PSTR/PE 1, STR/SS 1 and STR/SS 2 – see Comment Numbers PSLP_1921, PSLP_1923, PSLP_1924, PSLP_1926, PSLP_1927, PSLP_1928 and PSLP_1930. Full copy of representation attached as supporting information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

Don't know

Is sound

Don't know

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

REPRESENTATIONS ON BEHALF OF TESCO STORES LIMITED TOWN AND COUNTRY PLANNING (LOCAL PLANNING) REGULATIONS 2012 TUNBRIDGE WELLS (REGULATION 19) LOCAL PLAN CONSULTATION

As you know, we act on behalf of Tesco Stores Ltd, in respect of their various interests in Tunbridge Wells Borough and respond on their behalf to the Regulation 19 Tunbridge Wells Local Plan consultation, under the following headings.

Background

MRPP has extensive knowledge of both Tesco's activities in the Borough and the present (and historic) formalisation of planning policy in the Borough. We welcome the opportunity to engage with the emerging Local Plan and do so positively both in terms of representing our client's interests, and in terms of helping the Council to formulate effective policies which support development for the benefit of the Borough's businesses and residents.

Tesco Stores Ltd engaged with various components of the adopted Local Plan, both in terms of the development needs identified in the existing Core Strategy (primarily in relation to retail capacity) and the treatment of its various interests in the Borough in the subsequent Site Allocations DPD. We have, on their behalf, thoroughly reviewed the Reg 19 Local Plan and have sought to respond only to those policies and issues which directly or indirectly affect their property interests. We trust that this targeted approach assists officers, who will find our comments generally supportive, subject to several clarifications regarding evidence and the justification for designations, allocations and policies.

For ease, we set out our representations in a single letter and have, for each relevant policy or supporting text, used the Council's recommended responses (i.e. objection, support, support with conditions, or general observation). We have also set out some basic background to our client's presence in the Borough.

Tesco in Royal Tunbridge Wells

Tesco has been represented in Royal Tunbridge Wells since 1969 when its store at 29 Grosvenor Road first opened. Tesco has continued to serve the community, uninterrupted, since then and has subsequently enhanced its presence to now include:

- Supermarket Format – Woodsgate Corner (Pembury)
- Metro Format – Grosvenor Road, Tunbridge Wells
- Rye Road, Hawkhurst
- Express Format - St. Johns Road (Tunbridge Wells), London Road (Southborough) and Commercial Road (Paddock Wood)
- One Stop Format – Badsell Road (Five Oak Green), Forest Road (Hawkenbury)

It is well documented that Tesco, having secured planning permission for a substantial replacement superstore at Pembury, took the difficult decision not to implement this, arising from significant changes in the convenience shopping sector and other local factors. However, several of its stores, including Pembury, have undergone improvements as part of the firm's 'refresh' programme, with a greater focus on customers, merchandising and the quality of the retail environment.

Responses to Policies

Policy STR/SS1 - Strategy for Paddock Wood, including land at east Capel (support)

Tesco broadly supports the strategic approach for the expansion of Paddock Wood and east Capel and acknowledges the improvements to three neighbourhood centres providing approximately 2,000sqm of commercial floorspace (Class E) in total. It is agreed that this would be appropriate given the substantial planned growth in population here, secure more sustainable attitude and provide qualitative benefits (i.e., choice and competition).

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We reserve the right to attend any hearing sessions on the topic matters we have commented on accompanying written representations should the Inspector need to raise any questions during the Local Plan Examination.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_2

Comment

Agent	Paul Webster [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Maple Planning & Development Ltd
Address	[REDACTED] Tunbridge Wells TN2 [REDACTED]
Consultee	The Exall Family [REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	The Exall Family [REDACTED]
Comment ID	PSLP_81
Response Date	04/05/21 12:34
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_81_Paul Webster Maple Planning for the Exall Family_SI.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	The Exall family
Question 2	
Agent's Name and Organisation (if applicable)	Paul Webster, Maple Planning
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy STR/SS1 – Paddock Wood (Western Parcel).

On behalf of my clients, the Exall family, I write to detail their representations in respect of the above referred matter.

The Exall family own the extent of land as detailed on the attached plan. It represents a proportion of the Western Parcel of the wider Paddock Wood allocation as set out at Policy STR/SS1.

The wider policy designation promotes a comprehensive mixed use development for Paddock Wood, encompassing approximately 3,490 – 3,590 dwellings, employment provision, new primary schools, a new health centre, and sports, recreation and play facilities.

The Western Parcel is located to the north-west of the town, immediately to the west of Eastlands Estate (which is where, amongst other commercial occupiers, Baxall Construction are based), to the west of the houses on Maidstone Road and Nursery Road, and to the north of the commercial units on Eldon Way.

The Exall family are supportive of both the wider aspirations for the growth of Paddock Wood, and the identification/allocation of their land as part of that allocation.

However, alongside Policy STR/SS1, it is important to have regard to Map 28, which details a conceptual 'structure plan' for the wider allocation. That structure plan, although presumably only indicative at this stage, shows my clients land as part of a 'Strategic Landscape Corridor'.

Having regard to the characteristics of the site, though, I would question if this is the most logical approach to land use planning.

My clients land is previously developed – being largely covered in hardstanding and historically used for commercial purposes (being the former Paddock Wood brickworks).

By reference to the sustainability agenda, surely the use of previously developed land to accommodate new development is sequentially preferable to the use of greenfield components of the allocated land?

Or, to put it more simply, it makes more sense to build on previously developed land, rather than to return said previously developed land to a greenfield status whilst using adjacent greenfield land to accommodate new development.

As such I would respectfully suggest, on behalf of my clients, that Map 28 is in need of review, with a more sustainable focus on the allocation targeting new built form to areas of existing previously developed land located within the wider site allocation, before (sequentially) extending that focus to the greenfield components.

I hope that the foregoing sufficiently details my clients position, but should you require any additional information then please do not hesitate to contact me.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here. [PSLP_81_Paul Webster Maple Planning for the Exall Family SI.pdf](#)

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1496
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ

Question 1

Respondent's Name and/or Organisation Ian Bailey, Tonbridge & Malling Borough Council

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: see also representations PSLP_1495 (Covering letter on whole Plan), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant Yes

Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

This representation relates to the evidence base supporting the two strategic site allocations at Tudeley and East Capel/Paddock Wood:

The transport evidence base documents underpinning the Local Plan are inconsistent, contradictory and unrealistically optimistic. There is therefore a lack of clarity regarding the infrastructure interventions required to deliver a sustainable plan.

To illustrate this point, the transport assessments, modelling assumptions and proposed mitigations do not take into account normal organic growth and planned development proposals in the Borough of Tonbridge & Malling or other neighbouring authorities and therefore do not adequately address the impacts on the local highway network and the consequential negative impacts on local communities.

Notwithstanding this, the mitigations proposed are considered to be insufficient to fully address all of the impacts on Tonbridge, for example, increased traffic flows into Tonbridge and surrounding villages causing increased congestion and a likely worsening of air quality.

The highway impacts on this Borough will extend beyond Tonbridge, Hadlow, Golden Green and East Peckham, for example additional traffic heading north along the A228 to access the M20 and A26 towards Maidstone and these should also be addressed.

The evidence for the impact on the landscape in the vicinity of the strategic site allocations and biodiversity is incomplete because the Landscape and Visual Impact Assessment only applies to sites located within the High Weald Area of Outstanding Natural Beauty.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To revise the evidence base to address the omissions identified and ensure that the necessary mitigations are implemented

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge Civic Society
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge Civic Society [REDACTED]
Comment ID	PSLP_1266
Response Date	04/06/21 15:06
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Tonbridge Civic Society
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Policy STR/SS1

Tonbridge Civic Society – the largest amenity society in Tonbridge with almost 500 members – objects to the above proposals, which would have a big impact on Tonbridge and the countryside near it.

The proposal for 2,160 houses in East Capel taken together with the plans for a further 2,800 dwellings in the proposed Tudely “garden settlement” dealt with under policy STR/SS3, essentially amounts to a more or less continuous urban sprawl between Tonbridge and Paddock Wood.

This massively increased population will naturally focus for facilities on their nearest significant town, Tonbridge, which will be swamped by this pressure on its roads, railway station, healthcare and the like, which are already overburdened by substantial development in the town in recent years, with more proposed in Tonbridge and Malling Borough’s own local plan. This is totally unacceptable, particularly given that Tonbridge is in a different borough that will receive none of the rates levied on the new households.

Meanwhile this very substantial development will have a negligible impact on Tunbridge Wells, the centre of the TWBC that will be in receipt of the rates.

We see no evidence in the plan that the impact on Tonbridge has been assessed leave alone addressed

Most of our comments on the Tudely village proposal apply equally to this part of the plan and we would request that those applicable are taken into account here as well.

In addition, we note that this policy proposal casually brushes aside the fact that groundwater levels are high in the northern part of this area due to the proximity of the Upper Medway flood plain. It is clearly environmentally irresponsible to plan such substantial housing development on a flood plain and once again the increased flood risk will impinge on Tonbridge as well as other settlements along the river and not on Tunbridge Wells. We already have more than enough worries on this count

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To explain in more detail the injurious impact of the proposal on Tonbridge

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Steve Terry [REDACTED]
Email Address	[REDACTED]
Address	
Consultee	Steven Terry [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge Line Commuters
Address	[REDACTED] Paddock Wood TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge Line Commuters [REDACTED]
Comment ID	PSLP_1161
Response Date	03/06/21 21:30
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Tonbridge Line Commuters
Question 2	
Agent's Name and Organisation (if applicable)	Steven Terry - Committee Member
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 For Paddock Wood

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Tonbridge Line Commuters is the local public transport user group for the Tonbridge & Paddock Wood Area. We have over 50 years of experience in dealing with successive railway administrations and local bus companies in order to maintain and improve services

As an organisation we believe that the proposed Tunbridge Wells Local Plan does not properly address the public transport aspects of building large amounts of housing on greenfield land, and does not ensure that adequate transport infrastructure will be provided *prior* to the major expansion of housing in the Paddock Wood area.

Specifically;

- It is inevitable that due to the largely "dormitory" nature of the proposed Paddock Wood area developments that most adult residents will need to travel outside the immediate area to work, even if post Covid-19 there remains a significant element of home working.
- The existing road infrastructure in the area is already inadequate. Paddock Wood, which would be the most likely rail-head for commuting, would require a major increase in car parking provision, as well as road infrastructure upgrades *before* a further increase in housing. We do not see a strong enough commitment by TWBC to achieving this.
- We are not convinced that a bus network centred around travel to and from Paddock Wood town centre and railway station would be economically viable enough to develop and sustain a regular enough service with long enough operating hours to significantly reduce car journeys.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anne Trevillion [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anne Trevillion [REDACTED]
Comment ID	PSLP_1236
Response Date	04/06/21 12:58
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Anne Trevillion
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I have lived in Paddock Wood for over 30 years. In that time there have been new housing developments, not one of which has added to the cultural life and community of Paddock Wood, other than the Green Lane playing field with its mostly locked changing building. No new allotments have been provided, no dedicated cycle lanes, no park with interesting and imaginative plantings. No cultural hub such as art gallery, theatre or any kind of public art. In that time on street parking has become a real issue everywhere, and the traffic has become a real problem. Locally the bookshop and toyshop closed down years ago, and the so-called high street has empty buildings and an inordinate number of charity shops.

House prices are so high that local young people cannot afford them. The increase in the number of cars now parking at each house are a sign of the number of adult children now having to stay with their parents, but the housing was not planned to accommodate 3 and 4 cars per house. You can't stop people having their cars, as there is no feasible way of travelling without a car. Tunbridge Wells is not very accessible by train, and the buses are infrequent, very expensive, and don't run after 5 pm. The bus stops are far away from the majority of the housing in Paddock Wood. There is no way that a resident of Paddock Wood can participate in any evening (i.e. cultural) activity in Tunbridge Wells using public transport. Tonbridge is accessible by train, but there are few buses from the rest of the town to the station. – there is no joined up transport policy.

So we see a dormitory town, where most people work away from the town, travelling by car, and there is little in the town to engender a sense of community. Your plan consigns Paddock Wood to being no more than a town with some railway history – yet celebrates Tunbridge Wells as a tourist attraction and cultural hotspot. This attitude is so negative and fails to show any vision of sharing the cultural attributes of the area so everywhere becomes somewhere with a feature of which it can be proud. Yet the plan dumps the majority of the housing on Paddock Wood, with nothing to compensate. Just a very much larger dormitory town with no real centre or civic amenities.

The newest developments have no corner shops – no community halls or places for residents to meet. People have to drive to get to the local shops – the distances are greater than most people have time for by walking, and there is no safe cycle route.

This comment now focuses on STR/SS1.

I do not believe this is the right place to build the number of homes proposed.

The land is in a flood plain. The number of new homes is so vast as to increase the size of the town by a factor of 3. I see no evidence in the plan that flooding and drought issues, or local shops and local places for people to meet have been addressed. The plan state that there are likely to be flooding issues in the wet months (it is a floodplain) – and water supply issues in the dry months. Where is the plan to collect the excess water in the wet months and use it in the dry months? There need to be reservoirs, which would add habitat for water birds and wildlife. Note that the new estate off Green

Lane in Paddock Wood has tarmac driveways, causing more water runoff. Why were these not made water permeable? It is evidence that no real effort is being made to address the local flooding and water collection issues.

The transport issues are huge. The roads are poor. The B2017 is narrow, poorly maintained, and a nightmare when there are cyclists. The A228 similarly has no space to overtake cyclists, and is far too narrow for the type of traffic that it takes. Yet this is the road that everyone will have to use to access Paddock Wood, Tunbridge Wells or Tonbridge. So there is not sufficient infrastructure.

There is a nationwide shortage of GPs. How is there to be sufficient medical provision or dental provision for the increased population? I do not believe there is the capacity to serve the health needs of the increased population.

There is a site in Tunbridge Wells that has been an eyesore for decades – the old cinema site. Use that first for housing before moving onto Green Belt, unspoilt land in an area with no facilities and transport.

Question 6

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Reduce the number of houses, and aim to use brownfield sites elsewhere as much as possible.

Provide transport infrastructure in advance of the building, so people have real alternatives to car use.

Make dedicated cycle lanes all over the existing Paddock Wood town and on B2017, A228 and all other roads so cycling is a safe alternative. Cycles and pedestrians don't mix; cycles and cars don't mix.

Have a joined-up transport policy with cheap buses (as in London), through tickets on bus and train, buses that run near to people's homes to a hub where regular, frequent and useful bus and train service connect so people can access Tonbridge, Tunbridge Wells, and other local towns and villages throughout the day and evening, every day and evening.

Deal with flooding issues by collecting floodwater in wet months for use in dry times. Insist that parking surfaces are water permeable to replenish the groundwater and avoid water running into the overwhelmed drainage system.

Provide allotments for the houses - the pandemic and Brexit has shown that we need to have the opportunity to grow plants for better mental health and also produce our own low-carbon vegetables.

Provide more attractive green spaces - interesting plantings, imaginative landscaping using drought tolerant plants. Give residents ideas for how they can plant their gardens for less water use and sustainability for wildlife and pollinators.

Address the lack of meaningful cultural and sustainable living opportunities in Paddock Wood and Capel. Local theatre, small cinema, art gallery, craft workshops, repair facilities, no-waste shops. Community halls and gardens available in each housing area for use by the community - for birthday parties, yoga, music making, support services such as Sure Start, hearing aid services - whatever the community needs.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Vincent [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Vincent [REDACTED]
Comment ID	PSLP_888
Response Date	02/06/21 11:13
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	David Vincent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS 1 Paddock Wood inc land at East Capel

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- ☐ It is not effective
- ☐ It is not justified
- ☐ It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I've been a resident in Five Oak Green for 17 years, having moved here in 2004 with my wife, the rural location immediately appealed, with a village school and good, local amenities, it was the perfect place to start and raise our family whilst being able to commute easily to London for work. I have always been concerned about traffic increases, flood risk, noise increases, school place availability, access to good medical care and having access to green belt land for walking. These local plans seem to increase the risks of all my concerns, with no consideration to the current village residents and as such I believe the plans are unsound. With a young family, I do not want to be surrounded by extra traffic, noise/sound/light pollution and increased flood risk due to building on green belt land. There are other local sites such as Castle Hill that can cater for the increased housing demand much better. Destroying green belt land for housing which will be out of reach for younger locals seems illogical.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- ☐ Yes, I wish to participate in hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Losing farm land and flood plains - destroying green belt land for housing is unsound offers very little other than income for the property developers.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- ☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	jenny vincent ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	jenny vincent ([REDACTED])
Comment ID	PSLP_1306
Response Date	04/06/21 14:42
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jenny Vincent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Five Oak Green since 2004 and moved into the village newly married with my Husband. It is an lovely small community surrounded by amazing countryside that us and locals enjoy. We now have 2 daughters now 12 & 9 who also love their village location, they both attended the local Capel Primary and my eldest is now at Weald Grammar in Tonbridge, which is 3 miles away. The rush hour traffic (outside of covid restrictions) sees the traffic levels more than doubling the journey time for this short distance and it is not uncommon for the traffic jam to tailback right to FIVE OAK GREEN to the primary school. How can a proposal putting 4,000 houses into 1 location not have any impact on an area. Tonbridge & surrounding areas will just completely ground to a halt with over 4,000 extra cars on the roads. The parish will increase 500% in size and the infrastructure to supposedly help with the traffic (additional roads concreting yet more local fields/ local countryside) will never be in place before the volume of new houses are built. One proposed road would mean concreting farmers field which are home to cows & crops. My daughters have especially loved watching the different crops grow over lockdown and even written to local farmers and become friends with them and even been allowed to name the new calf's after showing such an interest. All this will be lost. With regards to infrastructure I am concerned also as to how sewerage system will cope with the 500% increase in homes in the area. It struggles to cope at the best of times and over the last few years Paddock wood have had sewerage collapses from the strain of new homes built in the area where with infrastructure not considered first. The water companies may suggest wonderful plans but will they be in place before any vast scale of building went ahead? I could continue on much more infrastructure problems, school oversubscriptions in the area as new primary & secondary schools will not be built again until xx amount of houses are built and places in the area are already oversubscribed. With 25+ years to build the housing to this scale you can see that the local problems will get far worse with not infrastructure happening before the plans start. Flooding is also another big issue for the proposed areas. The parish has suffered local flooding in recent years with excess water coming off of the fields that are proposed to be built on. Concreting these areas is just going to exacerbate these problems for the new homes and surrounding areas. How is this a plausible plan? Finally the local wildlife will be dramatically affected. We have seen recently on walks so many animals my daughters have never seen before, lizards, multiple butterflies, buzzards, herons and these are just to name a few. There will be so many animal habitats affected by this vast proposal. Why could the plan not see other brown sites be considered including the Castlefield's area to reduce the impact of the whole are being placed on the boroughs boundary where it is out of site out of mind for the other 19 wards. The proposed housing needs (to which are questionable on them being the realistic 'true' figures) need to be spread amongst the ward in the borough and greatly reduce the size of the proposal in Tudeley. I am concerned that the supposed housing allowance for 'local people ' in these figures will never be truly met when greedy developers put a price tag on them. I can see my daughter's who love this are will never get to bring their families up in this area as it will be too expensive to live and who would want to live in a concrete city?

Five Oak green will just become a continued extension of the ever increasing housing in Paddock Wood & with the plan also for 1,000 houses by the hop farm through the Maidstone borough council will mean virtually any field left in the local area, these again our on flood plains. How big will these expanding plans get if all the boroughs keeps getting these plans passed

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Why have other suitable sites not been considered within the borough?. there are other suitable brownfield sites that should be considered and haven't within the borough, there are now empty office buildings, such as AXA that are for sale, also the old cinema site and the main one at Castlefields site that have suitable land that is not an AONOB. I understand that there is a housing need but not to this level and certainly not to this scale in one area. If Tudeley is to be considered, if numbers are not met in other suitable locations, then this must be as an absolute minimum distribution to the greenbelt in terms of size and scale

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please come and visit our area when reviewing this plan and walk the areas to see how vast the scale and destruction will be to a local small ward of the borough. This needs to be considered in person to see the flaws in the plan not just looking at it on paper .
Thank you for your time in considering my response

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Rex Wakeling D.C.M. [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Rex Wakeling D.C.M. [REDACTED]
Comment ID	PSLP_181
Response Date	18/05/21 11:10
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Rex Wakeling
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paddock Wood: Totally against the Draft Plan for 4000 Houses for Paddock Wood, East Capel & Tudley Village.

We Need Social Housing in the Area, for People who Live In Paddock Wood and Capel. But before that we need infrastructure in place before any Houses are built! The mention Infrastructure is in the Draft Plan.

The Green Belt will be concrete over and lost of Wildlife, Trees Hedgerows as well as Farmland for Farmers to grow Food etc for the County and Nation. Instead of Garden Of England, it be called Concrete Of England.

I totally reject the Draft Plan for 4000 Houses in Paddock Wood & Capel.

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Gail Watson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Gail Watson [REDACTED]
Comment ID	PSLP_393
Response Date	25/05/21 16:11
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Gail Watson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- ☐ It is not effective
- ☐ It is not consistent with national policy

Question 5

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I have lived in Capel for more than 20 years, having moved to the area from Sevenoaks because of the peaceful countryside and to get away from traffic congestion and a built up area. We live on the outskirts of Five Oak Green and will be directly affected by the proposed link road which will run from Capel Primary School immediately in front of our house.

Since moving to the area the road traffic has become more of a problem, with cars racing down Church Lane and along the main road in Five Oak Green, where it is amazing that there have not been serious fatalities. There are times each day when we cannot go out by car because of cars parked on both sides of Church Lane, during term time. Occasional mobile speed cameras have no effect. Even today there are times when there are lengthy delays to get to/from Tonbridge because of the hold ups near the Somerhill schools, and having TGV next door will make this even worse. The area around the FOG shop is already very dangerous, with traffic constantly passing and no easy parking, with cars parked all around the green and on pavements and delivery lorries making it impossible to pass at certain times of the day. Increased traffic volumes will make all of this considerably worse.

The building plans are totally out of proportion to the local area, meaning that Capel will be swamped by a huge number of houses nearby. It is currently very difficult to get a doctor's appointment, meaning that thousands of families will be joining already stretched surgeries. There will be a similar knock on effect in respect of all other local services and transport.

The plans for the land East of Capel and surrounding Paddock Wood, together with TGV will almost all be built on farmland to the benefit of one already wealthy individual, and will make life a lot easier for TWBC as there is only one landowner to deal with. It was only a few years ago that TWBC turned down a modest planning application from the Poacher and Partridge pub saying that this would spoil the surrounding countryside, yet the same individuals are now happy to build 4000 houses literally next door.

The current proposals have taken no regard to alternative sites proposed, such as the Castle Hill proposal. Equally no consideration has been made to scaling down the proposals to a more manageable level. As such, I feel that the public consultation is a tick box exercise and a sham.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposals do not take into account any alternative sites or the possibility of a scaled down version (ie far fewer houses)

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Because having local people participate is the only way to stop this development taking place

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicola Gibb [REDACTED]
Email Address	[REDACTED]
Company / Organisation	West Peckham Parish Council
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	West Peckham Parish Council [REDACTED] [REDACTED]
Comment ID	PSLP_1114
Response Date	03/06/21 15:14
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	West Peckham Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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This submission is from West Peckham Parish Council on behalf of the residents of West Peckham, a small village on the east side of Tonbridge and Malling Borough.

TWBC wish to put very a major housing allocation adjacent to the border with Tonbridge and Malling Borough Council area. This will have major effects on the local road and rail infrastructure for the residents of the local parishes. No mitigation of the effects are planned.

We are concerned that the proposed development will generate significant traffic on the roads connecting to the M20 as the limited junction between the A21 and the M26 does not encourage eastbound traffic to travel via the A21.

The B2016, Seven Mile Lane, already carries a heavy and increasing traffic load as does the A228, Kings Hill, currently making it difficult to leave West Peckham village across the dangerous junctions. The increase in traffic due to the proposed major development will increase the likelihood of serious accident at the Seven Mile Road crossroad with Mereworth Road, adjacent to Mereworth Primary School and at the junction with The Street and the A228.

Many local residents commute to London and the trains at Tonbridge are already full. The increase in numbers of commuters getting on at Paddock Wood will make these crowded trains unusable, potentially causing more people to travel by car.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Question 8

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This submission is from West Peckham Parish Council on behalf of the residents of West Peckham, a small village on the east side of Tonbridge and Malling Borough.

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The B2016, Seven Mile Lane, already carries a heavy and increasing traffic load as does the A228, Kings Hill, currently making it difficult to leave West Peckham village across the dangerous junctions. The increase in traffic due to the proposed major development will increase the likelihood of serious accident at the Seven Mile Road crossroad with Mereworth Road, adjacent to Mereworth Primary School and at the junction with The Street and the A228.

Many local residents commute to London and the trains at Tonbridge are already full. The increase in numbers of commuters getting on at Paddock Wood will make these crowded trains unusable, potentially causing more people to travel by car.

Future Notifications

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No, I do not wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_66

Comment

Agent	Mr Julian Black [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Kember Loudon Williams
Address	unknown unknown unknown
Consultee	Mr Anthony Whetstone [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED], Five Oak Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Anthony Whetstone [REDACTED]
Comment ID	PSLP_1125
Response Date	03/06/21 12:20
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_1125, 1129, 1132_KLW for Mr and Mrs Whetstone SI Representations redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Mr & Mrs Whetstone
Question 2	
Agent's Name and Organisation (if applicable)	Kember Loudon Williams Ltd
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policies Map (Inset Map No(s)) 27 & 28

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Introduction and Background

Our client has land interest that forms part of Tunbridge Wells Borough Council's (TWBC) planned/proposed expansion area of Paddock Wood, which along with land at east Capel is proposed to deliver approximately 3,490 – 3,590 new houses.

Tudeley Brook Farm (the Site), is a private home with several outbuildings and set in extensive grounds which extend to approximately two hectares. The Site lies to the north of Paddock Wood directly south of Whetsted Road (A228). The full extent of the holding is identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and referenced 'Site DPC19'. The land is also included within the masterplan vision, development strategy and draft policy allocation for the proposed extension of Paddock Wood: referenced as Local Plan Allocation STR/SS1 and identified as part of the 'Western Parcel' in Map 27 Masterplan Areas of the Local Plan.

The Site (DPC 19) was not included within the original call for sites process, during the Regulation 18 consultation stage. Following consultation, a series of strong and credible planning arguments were brought forward including, but not limited to, the beneficial relationship of the Site to Whetsted Road and Tudeley Brook presenting 'natural' tangible and defensible boundaries to the western parcel, the facility to contribute meaningfully to flood water/water management requirements to the benefit of the wider development, and with other interests, the provision of public open space/ country park, integrated

with land to the south and west for the benefit of new and planned communities: all supporting the inclusion and integration of the Site within the planned growth proposed at Paddock Wood.

The Site was then appraised by a team of highly regarded independent consultants covering amongst other disciplines, urban design and master planning, flood and water environments, transport and integration and ecology. The complete professional team, appointed by TWBC undertook the master planning work (based on garden settlement principles) to inform the proposed strategic growth at this location.

Following months of detailed assessment and appraisal across all technical disciplines, the appointed consultant team independently concurred with our view on the planning and environmental benefit of fully including the Site within the planned expansion of Paddock Wood. The land now forms part of the Western Parcel of Strategic Site STR/SS1 (as set out in Map 27 on page 148 of the Regulation 19 version of the Plan) and similarly features in the Structure Plan (as set out in Map 28 on page 149 of the Regulation 19 version of the Plan). The land has been removed from the Green Belt and is designated within the Structure Plan as land within a Green and Blue Strategic Landscape Corridor, with overarching visual/physical amenity, ecological, landscape, movement and connection benefits to manage flood waters and to support the well-being of the new communities.

Green and Blue Strategic Landscape Corridor

This green and blue infrastructure is a core component in the acceptability of the proposed development. The Site is an integral part of the masterplan vision adding real value to the wider strategic development planned around Paddock Wood and acts as a facilitator in the following ways:

- . With other land parcels adjoining to the south and west, the site provides a significant and necessary area of 'natural' public open space that will provide an appropriate quantum of amenity space for informal and formal play, whilst providing amenity value for the planned and existing houses;
- . The Site plays a crucial part in providing community infrastructure for the new and existing residents of Paddock Wood with an important green footpath running alongside the boundary;
- . The Site's northern and eastern boundaries are defined by Whetsted Road and Tudeley Brook respectively – the combination will form a strong and defensible new edge to the settlement expansion, thus protecting from future incursion into the Green Belt. Visibility to and from adjoining rural areas will be limited and cohesion between settlements will be maintained;
- . The Site will make a positive contribution to strengthening and restoring an integrated network of habitats for the benefit of nature – this is critical and is a direct response to the heightened importance of integrating biodiversity and ecological interest into new developments that is emerging through the Environment Bill, and which will receive Royal Assent shortly; and
- . Use of the Site provides an opportunity for meaningful improvement to the extant local flooding and drainage issues. It also an essential component of the wider flood alleviation measures that are so critical and necessary in this location to support the delivery of the new housing and, fundamentally, to protect the safety of future residents.

Whilst commendable, this green and blue infrastructure designation raises a requirement to facilitate land equalisation agreements for the benefit of landowners required to "give over" their land for the future benefit of the wider community. The merit and benefit that the Site brings should be acknowledged and properly accounted for in the Local Plan.

Comprehensive Masterplan

Section 3 of the Pre-Submission Local Plan reveals with visions and strategic objectives and sets out the main guiding factors for different parts of the Borough. For Paddock Wood the vision is *"to provide for **comprehensive planned strategic growth that is fully aligned with timely infrastructure provision and which delivers significant improvements** in local employment, town centre, leisure and other services/community facilities commensurate with its enhanced role, as well as ensuring that it is not vulnerable to flooding"*.

Paragraph 5.193 in the supporting text to Policy STR/SS1, also notes the vision for Paddock Wood and further comments that it is important to *"help develop the growth around Paddock Wood and east Capel **strategically and holistically**"*.

The Strategic Sites Topic Paper for Pre-Submission Local Plan (March 2021) explains that the appointed consultant team, led by David Lock Associates (DLA), correctly took an "ownership blind" approach to developing the master plan vision for the planned growth. Adopting this approach ensured that the

planned expansion fully maximised the development potential in terms of securing the important garden settlement principles, providing the key infrastructure in the right locations, without influence or favour on landowning interests.

This ownership blind approach to master planning has directly resulted in the Site being positively included within the wider strategic allocation for Paddock Wood in the Western Parcel of Strategic Site STR/SS1 (Map 27) and also in the Structure Plan (Map 28). We welcome the Site's allocation but have grave concerns that it does not feature nor is it discussed anywhere in written form in the Regulation 19 version of the plan. In other words, there is no commitment in the actual wording of any policies to support the Site and facilitate its wider integration. This is contrary to TWBC's adopted professional and independent advice from its advisors who have recommended its inclusion within the masterplan. It is essential now that TWBC commits fully to the entire masterplan vision, including the Site at Tudeley Brook Farm, to ensure that the full benefits of the masterplan are realised. Specific wording within the draft policy is required to ensure that the vision is comprehensively delivered.

TWBC's objectives for a collaborative landowner approach is reinforced in the Strategic Sites Topic Paper for Pre-Submission Local Plan (March 2021). This Topic Paper provides the background to the Strategic Sites Working Group forum and explains that all stakeholders were made aware of the requirement to deliver the growth around Paddock Wood and east Capel, and Tudeley Village, in line with garden settlement principles, *"acknowledging that these carry a higher infrastructure burden"*. Paragraph 3.5 states that site promoters were advised that they may need to *"prepare for the potential use of equalisation agreements in order to achieve ambition, but reasonable, objectives sought"*.

Chapter 7 of the same topic paper is concerned with deliverability and viability but throughout this chapter, reference is only made to the key site promoters. Regrettably, TWBC have focussed their attention on the four principal housebuilders: Crest Nicholson; Dandara; Redrow and Persimmon with little regard to the smaller site promoters. TWBC has failed to properly acknowledge that there are other important areas of land that, following independent review, now form viable and necessary component parts of the overall plan. This requires resolution in order for the plan to become effective and therefore sound.

The final paragraph to Policy STR/SS1 currently states: *"It is highly likely the delivery of the development will require land equalisation agreements. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate master planned approach"*.

Given that TWBC have acknowledged that it is *"highly likely"* that the development will require land equalisation, in the interests of astute planning and deliverability, the local plan must address these land equalisation omissions now. Without the necessary controls to ensure the comprehensive delivery of the whole masterplan vision, the policy/plan is not effective and is, therefore, unsound.

Furthermore, the Strategic Sites Masterplanning and Infrastructure Study (February 2021), prepared by DLA, has a whole chapter dedicated to delivery (Chapter 7). It highlights that *"instances may arise where one developer is meeting the full cost of infrastructure shared by all, or one is disproportionately contributing in a different way such as by providing land"*. It concludes that *"Developers should be invited to form their own collaboration agreement or alternative mechanism for the equal sharing of costs. Should this not occur, **TWBC should facilitate this process**"*.

TWBC's own advisors have therefore recommended that TWBC must 'step in' if it is becoming clear that an equalisation agreement is unachievable. Furthermore, they point out that this should be actioned in a timely fashion so that the delivery of the development is not delayed.

It is therefore important that this land equalisation agreement is enshrined into the policy wording now for clarity and to avoid unnecessary delays in the delivery of the wider masterplan. The present wording contained within the draft policy (*It is highly likely the delivery of the development will require land equalisation agreements*) is vague and lacks the 'teeth' necessary to ensure that the scheme is delivered in its entirety, as envisaged. The correct vehicle to support the development of Paddock Wood is through an equalisation agreement. It is imperative that TWBC, as Planning Authority, take complete charge of this process in the public interest and absent of private agreements between the affected stakeholders.

We would respectfully ask TWBC to note that we approached Crest Nicholson, historically, and again very recently to explore collaborative working possibilities: linking in with Site DPC19. Regrettably, especially given the emphasis and need for comprehensiveness, these approaches have been rejected. So, despite our endeavours, at present there is no collaboration or agreement between landowners.

Without TWBC's support, there are concerns that our client's land (and other smaller land holding interests) that form a legitimate and important part of the integrated masterplan vision will be marginalised to the detriment of the overall planned vision and interests of acknowledged importance including: amenity provision and open space, blue/green infrastructure, connectivity, ecology and biodiversity, all of which are key and central planks to the masterplan/ policy vision of the Paddock Wood expansion. Delivery is central to the soundness of the plan and it is clear that land equalisation is fundamental to this.

Flooding

Throughout the Plan there is a stated ambition to ensure that the proposed growth strategy can be accommodated to provide betterment, without further harm and risk to areas that are vulnerable to flooding.

We have real concerns that this "betterment" will not materialise if the Site is left to stand in isolation and that the wider development will cause further harm to the Site which is already prone to flooding.

The Strategic Flood Risk Assessment "SFRA" (July 2019) shows that the Site is identified as being located in Flood Zone 2 but surrounded by land in Flood Zone 3a. The maps showing the flood zone of the site, taken from the SFRA, is provided below for reference.

[TWBC: for map, please see full representation attached as a supporting document]

Long dated on-site experience shows that following heavy rainfall, the culvert to the north west of the Site (which runs under the A228) is not fit for purposes. It has insufficient capacity even now to accommodate heavy rainfall and results in leeching from Tudeley Brook (which borders the subject site to the east) during inclement weather patterns. Our clients have funded their own flood defence strategy to ensure that the house itself remains protected during these periods but the garden areas become unusable during these weather conditions.

Flooding clearly presents a constraint that has to be managed through the masterplanning process and it is imperative that our client's land is included and used proactively to mitigate flood risk elsewhere in the wider development plans. Leaving the Site isolated will significantly increase the level of leeching to the detriment of our client's amenity.

There is a case to say that the whole of the Site (including the formal house) should be taken over and restored back into the functional flood plain. At present, there is for example a 600mm flood bunding barrier running the entirety of the Tudeley Brook elevation. Removing this bunding along with the other structures and hardstanding on the Site would significantly and materially extend the space available for flood storage. Restoring the functional floodplain would generate significant betterment and indeed this is a practice endorsed in the NPPF with Paragraph 157c.

A key objective for Paddock Wood is ensuring that the proposed growth strategy can be accommodated without further harm and risk to areas that are vulnerable to flooding, to provide betterment. If the Site is left to "row its own boat" there will be no betterment, only harm. The development scheme would go against the stated ambitions of the local plan. A mechanism for compensation needs to be put in place now in Policy STR1/SS1 and a properly conceived and managed land equalisation strategy will assist with this.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure that the strategic allocation is deliverable and therefore sound, it is imperative that all the landowners are given due consideration and are fully involved in the plan making process.

The plan states at Paragraph 5.178 that site promoters have “indicated” their support for the proposals and so deliverability is “anticipated” to be achievable over the plan period. Our experience has shown that this is not the case.

In order for the plan to be effective and deliverable, stronger commitment and management from TWBC is required. The Council must take charge of this process (as advised by DLA) and we recommend that the Council seeks to ensure a land equalisation agreement is in place for the western parcel of land at Paddock Wood prior to submitting the draft Local Plan to the Secretary of State.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to ensure that the Plan is found sound.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1125, 1129, 1132 K LW for Mr and Mrs Whetstone SI Representations redacted.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Wildman [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Wildman [REDACTED]
Comment ID	PSLP_863
Response Date	01/06/21 22:43
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	David Wildman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I live adjacent to the A228 on the outskirts of Pembury. The area covered by the proposed development is therefore at some distance from the place where I live. although I do walk and otherwise visit and pass through that area frequently. Even though I do not live there, I feel strongly that the proposed development would destroy both the recreational value of significant areas of Green Belt, and also the character of a large area of immense charm that presently is enjoyed by far more people than just those who live close to the proposed development.

The local road infrastructure is already overloaded and certainly not capable of supporting 4000+ new homes from developments proposed for Tudeley and East Capel. In particular the A228 and the A264 will not support extra traffic into and out of Tunbridge Wells town centre. The A264 is already almost impassible at peak times. The A228 carries a great deal of ambulance traffic between Tunbridge Wells and Maidstone hospitals. I live adjacent to the A228, and already find it difficult and dangerous to join the road. Two large trucks can barely pass each other, and must slow to a crawl on the A228 between Pembury and the Five Oak Green roundabout.

A station at Tudely seems unlikely as an option to relieve pressure on road transport, but it is difficult to see how additional parking could be provided at either Paddock Wood or Tonbridge Stations where parking is already difficult.

The proposed development falls entirely within the Green Belt and an area considerably larger than the proposed development will inevitably be blighted. Associated necessary infrastructure such as new or wider roads will cause further blight. Other current infrastructure including schools, hospitals, libraries, gyms and other recreational facilities etc will be overloaded, and addition of new facilities will further blight the countryside.

The development itself would fall entirely within the Green Belt and would result in almost continuous development from Paddock Wood to Tonbridge. Apart from direct destruction of Green Belt on which the development would stand, it would serve to break apart two Green Belt areas thus substantially increasing its destructive effect.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Wildman [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Wildman [REDACTED]
Comment ID	PSLP_147
Response Date	16/05/21 16:59
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	David Wildman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I live adjacent to the A228 on the outskirts of Pembury. The area covered by the proposed development is therefore at some distance from the place where I live. although I do walk and otherwise visit and pass through that area frequently. Even though I do not live there, I feel strongly that the proposed development would destroy both the recreational value of significant areas of AONB and Green Belt, and also the character of a large area of immense charm that presently is enjoyed by far more people than just those who live close to the proposed development.

The local road infrastructure is already overloaded and certainly not capable of supporting 4000+ new homes from developments proposed for Tudeley and East Capel. In particular the A228 and the A264 will not support extra traffic into and out of Tunbridge Wells town centre. The A264 is already almost impassible at peak times. The A228 carries a great deal of ambulance traffic between Tunbridge Wells and Maidstone hospitals. I live adjacent to the A228, and already find it difficult and dangerous to join the road.

A station at Tudely seems unlikely as an option to relieve pressure on road transport, but it is difficult to see how additional parking could be provided at either Paddock Wood or Tonbridge Stations where parking is already difficult.

The proposed development borders directly on to the High Weald AONB so that the latter will inevitably be blighted. Associated necessary infrastructure such as new or wider roads will cause further blight. Other current infrastructure including schools, hospitals, libraries, Gyms and other recreational facilities etc will be overloaded, and addition of new facilities will further blight the countryside.

The development itself would fall entirely within the Green Belt and would result in almost continuous development from Paddock Wood to Tonbridge. Apart from direct destruction of Greem Belt on which the development would stand, it would serve to break apart two Green Belt areas thus substantially increasing its destructive effect.

The settlement at Tudeley, which includes the historic church with its Chagall windows, has immense character immense character which contributes greatly to the surroundings. This character would be lost for ever if the development goes ahead.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I do not believe the planned development is capable of modifications which would make it acceptable.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Comment

Consultee	Ms Bridget Fox [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Kempton Way Grantham NG31 6LL
Event Name	Pre-Submission Local Plan
Comment by	Woodland Trust [REDACTED]
Comment ID	PSLP_1421
Response Date	04/06/21 16:31
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Woodland Trust
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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The Woodland Trust does not take a position on the creation of new settlements on greenfield sites per se. We are however concerned about the inclusion of ancient woodland in this site, risking the protection afforded this vital habitat in the NPPF and reflected in the draft local plan policy EN13.

Ancient woodland is a precious habitat that should be protected and managed in a sustainable way to maximise its wildlife, landscape and historical value. Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. Ancient woods are important reservoirs of biodiversity, but already highly fragmented, so that they and their associated wildlife are particularly vulnerable to encroachment from development. Further details on the necessary protection for ancient woodland can be found in the Woodland Trust's Planners Manual for Ancient Woodland (2nd edition 2019).

<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>

Existing and emerging national policy requires not only the protection of existing habitats but their enhancement and extension. Policies for biodiversity net gain and nature recovery cannot be delivered if irreplaceable ancient woodland is eroded.

The Paddock Wood and Capel site includes the following areas of ancient woodland:• Unnamed ASNW at TQ67244374• Whetsted Wood ASNW at TQ66144546• Unnamed ASNW at TQ66234528

We note and welcome the proposal in EN13 to assume a 25m buffer zone for ancient woodland. However, given the scale of development proposed at this site, we feel that a larger buffer is required to secure the necessary legal protection for the ancient woodland.

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.

Question 6

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We recommend redrawing the site boundaries to exclude areas of ancient woodland from land allocated for development.

Whether the ancient woodland is within or outside the development site, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Buffer zones can form part of the accessible natural green space required for future residents.

This will improve compliance with national policy by protecting the ancient woodland from loss or fragmentation and from harmful effects of pollution or encroachment on root areas. It will also make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Woodland Trust is the UK's leading woodland conservation charity with specific expertise on the management and protection of ancient woodland.

Supporting Information File Ref No: SI_41a-b

Comment

Agent	Steve Clarke [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Graham Simpkin Planning
Address	[REDACTED] [REDACTED] Longfield [REDACTED]
Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Yalding Parish Council
Address	[REDACTED] [REDACTED] MAIDSTONE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Yalding Parish Council [REDACTED]
Comment ID	PSLP_624
Response Date	28/05/21 13:11
Consultation Point	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_616, 622-625_GSP for Yalding Parish Council_SI-2_Representation.pdf PSLP_616, 622-625_GSP for Yalding Parish Council_SI-1_Covering Letter_Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Yalding Parish Council
Question 2	

Agent's Name and Organisation (if applicable) Graham Simpkin Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

[TWBC: this representation has been input against Policies STR 1, STR 4, STR 6, STR/SS 1, STR/PW 1 - see Comment Numbers PSLP_616, PSLP_622, PSLP_623, PSLP_624, PSLP_625]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Representations on the Tunbridge Wells Local Plan 2021 on behalf of Yalding Parish Council

1 INTRODUCTION

1.1 Graham Simpkin Planning has been instructed by Yalding Parish Council to review the Pre-submission (Regulation 19) Tunbridge Wells Local Plan 2021 (hereinafter referred to as the Local Plan) and its associated evidence base as to the potential effects of the plan on Yalding Parish and to consider whether the Local Plan is legally compliant and meets the test of soundness.

1.2 Yalding Parish lies immediately adjacent to the Tunbridge Wells Borough Council (TWBC) administrative area on its north-eastern edge with the southern part of the parish lying less than a mile from the existing northern part of the built-up area of Paddock Wood which contains a number of employment sites, a railway station on the Ashford to Tonbridge-London main-line and convenience retailing as well as a secondary school.

1.3 Yalding lies within Maidstone Borough Council's administrative area. To the west of the parish runs the A228, to which Yalding is connected by Gravelly Ways/Beltring Road at Beltring and the B2162 Hampstead Lane via the B2015 through the parish of Nettlestead. The parish also has a direct road connection through to Horsmonden to the south east via the B2162. Roads also connect Yalding village to Paddock Wood via Laddingford and Queen Street and along Willow Lane and Lucks Lane. Yalding village lies towards the north of the parish with Laddingford village to the south. The parish is heavily influenced by the three rivers that run through it (Medway, Teise and Beult) which all converge in Yalding. The parish is also served by the Medway Valley railway line which runs between Maidstone and Paddock Wood, with two stations at Yalding and Beltring.

1.4 The Parish are aware that any representations at this stage should relate to matters of compliance with legal and procedural requirements and the soundness of the Local Plan, as these are the matters that will be examined.

2 Legal Compliance

2.1 The Local Plan appears to have been prepared in line with the adopted Local Development Scheme (February 2021) and the adopted Statement of Community Involvement.

Duty to cooperate

2.2 Yalding Parish Council do not wish to specifically comment on whether the Plan is legally compliant in terms of the Duty to Cooperate preferring to leave that for the examining Inspector to determine. The Parish is also aware that there are likely to be imminent changes with regard to the Duty to Cooperate and that these are currently being considered by the Government alongside other potential reforms to the current planning system.

2.3 However, Yalding PC is aware that the emerging Local Plans of two local planning authorities have fallen at the Examination stage (Wealden and Sevenoaks) and that there are on-going concerns with regard to the Tonbridge and Malling Local Plan. The common problematic issue to all three plans is the Duty to Cooperate.

2.4 All of these Councils immediately adjoin TWBC.

2.5 Given that the Duty to Cooperate works in both directions, there must be some doubt therefore, that TWBC has met its legal obligations in this area and TWBC should have made clear how the Council has responded to the cooperation challenges identified by planning inspectors reporting on Local Plans in the above three council areas. They have failed to do so.

2.6 The Parish would also wish to put on record, as an adjoining authority whose administrative area lies immediately adjacent to the proposed significant expansion of Paddock Wood including newly proposed employment areas, that other than through the general consultation processes that have taken place in the preparation of the new Local Plan they have not been directly consulted by TWBC or been invited to actively engage with them as they have prepared this pre-submission (Reg 19 draft).

Sustainability Appraisal (SA)

2.7 Again the Parish Council do not wish to specifically comment on the comprehensiveness or assumptions and findings of the SA preferring to leave that for the examining Inspector to determine.

2.8 TWBC must however have clearly set out in the SA how they have approached the various options assessed and how they have reached the conclusions on their preferred options and why some have progressed and some not. It is incumbent on the Council to demonstrate that the SA has not been designed in a way that justifies its own preferred approach rather than genuinely considering potential spatial development options and then basing the preferred strategy on how each option performs. Given that the Council's preferred strategy has not fundamentally changed since the Reg 18 consultation, the fact that additional spatial development scenarios have been added to the SA since the Regulation 18 draft does provide a degree of uncertainty as to whether the SA has actually led the development of the Council's preferred spatial strategy or has been designed to justify it.

3 Soundness

3.1 Yalding Parish Council's comments have been considered in the light of and are based on the four tests of soundness.

- . **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- . **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- . **Effective** - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- . **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

3.2 The Parish Council expressed concerns in their response to the Regulation 18 Consultation in relation to the proposed strategy in two main areas that of Transportation and Flooding and in particular, the potential implications of the proposed significant expansion of Paddock Wood on both as they may directly affect land within the Parish Council's area.

3.3 In its Regulation 19 Pre-Submission version of the Local Plan, TWBC are still proposing very significant growth at Paddock Wood and East Capel of approximately 4000 new dwellings (Table 4/page 42), plus employment (11.2ha - Table 5/page 43) and associated leisure and education and health/community facilities. As stated above, Paddock Wood lies very close to the southern boundary of Yalding Parish and Maidstone Borough Council's administrative area. Indeed, the proposed urban extension of Paddock Wood would extend almost to the boundary shared by the Boroughs.

3.4 Yalding PC acknowledges the master-planning work that has taken place since the Regulation 18 consultation, in particular that of the Strategic Sites Working Group that Maidstone BC is represented on. In this regard, the progress which has led to the Paddock Wood and East Capel Structure Plan (map 28 page 149) which has sought to clarify and provide more detail on how the expansion might be delivered is noted.

3.5 We also note the fact that extensive SuDS and Green and Blue Strategic Landscape Corridors are proposed on the northern side of Paddock Wood, whilst noting that the proposed employment areas have significantly less of these proposed features.

3.6 Nevertheless the Parish Council remain of the view that it has not yet been demonstrated that the plan is positively prepared, justified and effective on the grounds of Transport and Flood Risk and the potential for the significant levels of new development proposed for the Paddock Wood area to impact on traffic through the Parish and the risk of flooding downstream.

As a result, the Parish Council have particular concerns regarding elements of the following policies;

STR1 The Development Strategy

STR5 Ensuring Comprehensive Development

STR6 Transport and Planning

STR/SS1 The Strategy for Paddock Wood including land at East Capel

STR/PW1 The Strategy for Paddock Wood

The reasons for which are discussed in greater detail below.

4 TRANSPORT

4.1 The Paddock Wood economic opportunities report (December 2020 by SQW) prepared as part of the evidence base of the Regulation 19 Plan and the master-planning work indicates that only 30% of the workforce in Paddock Wood live and work in the town, 30% commute to Tunbridge Wells, 20% commuting out to Tonbridge and Malling and some 5% commuting out to Maidstone and. In terms of in-commuting some 30% commute in from Tonbridge and Malling, 25% from Tunbridge Wells and 15% from Maidstone.

4.2 Having analysed the economic baseline of Paddock Wood SQW concludes as follows;

'7.2 The strategic context and rationale for this paper is that the DLP plans for the significant growth of Paddock Wood in terms of housing and population: the town will nearly double in size. The clear focus of all of TWBC's adopted and emerging planning and economic development policy is on Tunbridge Wells itself, and its relationship with the wider functional economic area, including Tonbridge and Sevenoaks. The target sectors and economic priorities / objectives do not align well with the Paddock Wood economy: one that is principally and increasingly dominated by large-scale wholesale/distribution and logistics employers, growing at the expense of other economic sectors; housing unaffordability for those who live and work in Paddock Wood is growing; outward commuting is increasing as well.

7.3 Sat within this context, there is a risk that a consequence of the planned growth of Paddock Wood could be a significant increase in out-commuting with a mis-match between the future population and the employment base/sectors.'

4.3 Whilst the Plan has been amended to reflect some of the recommendations of SQW it is difficult to see how the Council will ensure that the wholesale/distribution and logistics sectors will not continue

to dominate employment provision in Paddock Wood especially in the light of potential longer-term structural changes to working patterns and consumer demands as a result of fall-out from the Covid-19 pandemic.

4.4 Any significant increase in out-commuting would inevitably lead to a proportion of those additional journeys heading towards Maidstone and passing through Yalding Parish and potentially in particular the constrained historic bridges that are already congested.

4.5 If out-commuting increases as a result of the dominance of the wholesale/distribution/logistics sector, and the jobs are not filled by Paddock Wood residents then it is logical that they will be filled by workers from elsewhere including from within Maidstone District, again with potential implications for traffic flows into and out of Yalding Parish.

4.6 The Regulation 19 Plan and relevant policies/supporting text (see paragraph 3.6 above) and supporting evidence is silent on this issue and thus in the opinion of Yalding Parish Council not effective or justified.

4.7 Then there is the issue of modal shift and the extent of the Plan's reliance on this and the proposed public transport improvements. The proposals for significant development in the Paddock Wood area remain predicated on the fact that significant public transport improvements, alongside junction and highway improvements will ensure that additional transport impacts on the local road network will be sufficiently mitigated. The supporting evidence base is clear, that in order to mitigate the effect of this substantial planned growth the active transport measures, enhanced public transport and the associated highway improvement works are all required to render the proposed level of development at Paddock Wood/East Capel anywhere near acceptable in terms of impact on the local highway network.

4.8 Clearly work as part of the master-planning for the proposed allocation has put some further 'flesh on the bones' of the public transport improvements in an attempt to highlight anticipated modal shift targets and shed further light on the highway works necessary to mitigate some of the impact of the proposed growth on the local highway network.

4.9 However, the analysis behind this conclusion still does not guarantee that there will be the significant modal shift necessary to mitigate the impact of planned growth.

4.10 Public Transport is largely run on a commercial basis and whilst contributions to 'kick-start' services can be sought from developers, these cannot fund the provision of these services in-perpetuity and in any event it is also very likely to be the case that the improvements will only be provided once a 'critical mass' of new homes to supply the passengers has been reached. There is also of course no guarantee that once any developers' subsidy/contribution ceases or is exhausted, that the services will be at that stage be commercially viable and continue. Or for that matter, there is no guarantee that people can be enticed from their private cars onto public transport in the first instance.

4.11 As with the earlier Regulation 18 Consultation draft, the Regulation 19 Draft and the supporting evidence base does not sufficiently consider cross-border traffic movements and therefore fails to consider whether there will be traffic impacts beyond the areas where public transport improvements are proposed.

4.12 Currently there is an established level of commuter traffic movements between Maidstone and Tunbridge Wells that use 'B' roads and other roads that connect to the A228 corridor that run through the Yalding Parish. With the level of development proposed for Paddock Wood and TWBC's aspirations for Tunbridge Wells itself and the changes to the employment offer of both, there is potential for these movements to increase.

4.13 There is also inconsistency between the assumptions in the Stantec Access and Movement Report for Paddock Wood/East Capel and Tudeley Village and the SQW report as to the extent of internal and external movements.

4.14 Due to the longer distance of these commuting movements the proposed public transport improvements that are focussed on Paddock Wood are not considered to present a suitable mitigation package.

4.15 It is also clear that even with the highway mitigation proposed key junctions on the A228 and others to the north of Paddock Wood will be over capacity. The two junctions on the A228, the 'Hop Farm' roundabout and the Branbridges Road/Boyle Way roundabout, have both been assessed as being over capacity and yet mitigation is only proposed for one of them. Given that the Beltring Road/Gravelly Ways junction (one of the key connections with the A228 for the highway network in

Yalding Parish also falls in this section it is likely that users of this road will be affected, particularly due to the need to use both roundabouts if travelling from Tunbridge Wells/Paddock Wood to Yalding. (Refer to SWECO March 2021 Report Appendix G).

4.16 Given that the public transport improvements will not extend into the Yalding Parish it is considered that it is reasonable to assume that there will at least be an increase of traffic movements affecting key junctions within Yalding Parish although it cannot be established how significant these increases would be. A similar concern is also raised about the development proposed for Horsmonden and the potential increase in traffic on the B2162. Modelling that has been undertaken shows an increase in potential distribution of traffic northwards on the B2162 towards Yalding

4.17 There are also concerns about a potential indirect impact of the proposed 'Colts Hill Bypass' on the A228. Currently due to the constraints of this part of the A228 some commuters travelling from the Maidstone area to the Tunbridge Wells/Tonbridge area seeks alternative routes that avoid the A228 mainly going via the A26 and thus avoiding both the A228 and the Yalding area. It is possible that with the creation of the bypass that some of this traffic will return to using the A228 including accessing it via routes that run through Yalding Parish.

4.18 Overall it is argued that the transport evidence base insufficiently considers cross-border impacts with Yalding Parish and this therefore impacts on the conclusion as to whether the level of development in the Paddock Wood area is sustainable or whether it would lead to additional unmitigated impact on the local road network in Yalding Parish, particularly to the south of Yalding and Laddingford as well as the High Street/Town Bridge area of Yalding.

4.19 Yalding Parish Council also wishes to put on record at this stage their concerns and strong objections to the suggested possibilities (however remote and medium to long-term they may be) at paragraph 4.12 of the Local Cycling and Walking Infrastructure Plan (LCWIP): Phase 2 prepared by PJA for the closure to all vehicular traffic, except buses, of the Maidstone Road Railway Bridge and to close Commercial Road to through traffic in effect reinstating measures that had been installed by KCC and subsequently removed. This is likely to render access to Paddock Wood Town Centre and its services very problematic for residents of Yalding Parish, forcing them to use unsuitable rural lanes to the east of Paddock Wood or onto the congested A228 Whetsted Road and B2017 Badsell Road to gain access to the Town Centre and local services. The Parish notes that the above possibilities do not appear in the costed proposed set of cycling and walking improvements that are set out in the LCWIP and would hope that the possibilities set out at paragraph 4.12 are nothing more than a 'kite-flying' exercise. They also note that the Stantec report does not mention this as possibility, but they do note the Strategic Sites Masterplanning & Infrastructure Study (David Lock Associates) does raise the possibility of introducing a new bridge and link over the railway to the west of the Town Centre to provide easier access to the northern employment areas and reduce traffic on Maidstone Road, but recognises that this will require extensive discussions between the various landowners/developers and Network Rail (or their successor body).

4.20 It is the case that significant elements of the proposed transport mitigation package remain to be determined and are uncertain. In this regard the Parish Council considers the plan and the policies relating to Paddock Wood to not be justified or effective.

5 FLOODING

5.1 The impact of any development on the river network remains a significant consideration for Yalding Parish. The parish is the meeting point for three rivers; Medway, Teise and Beult. On reviewing the local plan and the relevant parts of the evidence base, the Parish has concerns regarding the impact of the proposed development strategy on two of these river networks; the Medway and the Teise.

5.2 Flooding issues within Yalding arise from three types of flooding (fluvial, surface water and groundwater).

5.3 In respect of fluvial flooding, the SFRA recognises that a primary cause of fluvial flooding events on the River Medway is the overloading of foul and/or sewer systems in the Paddock Wood area. The proposed level of development is thus potentially likely to increase this issue. The Parish Council recognises that additional work has been undertaken by JBA in association with the 'Structure Plan' for Paddock Wood/East Capel undertaken on behalf of TWBC by David Lock Associates. JBA have stated the following in their January 2021 Technical Note.

'The proposed Masterplan layouts have not been assessed in the River Medway flood risk model, as modelling of development parcels prepared for the Level 2 SFRA indicated that the influence of

development on flood risk from the Medway was smaller in scale than from Paddock Wood Streams. Flood risk from the River Medway is confined to the northern extent of the masterplan area (at the periphery of the River Medway floodplain), and potential impacts brought about by development are more influenced by potential loss of floodplain storage, compared with potential obstruction to flood flows as in Paddock Wood.'

It is clear that more work is required to ensure that the proposed level of development does not result in the loss of floodplain storage which in turn will have a potential knock-on effect on flood risk from the River Medway and as a direct consequence an adverse impact on land and property in Yalding Parish. It is essential that this work is undertaken to avoid the level of development and any loss of floodplain storage having an adverse cross-boundary impact.

In this regard Yalding Parish Council do not consider the plan to be effective or justified.

5.4 Yalding Parish Council note the work that has been done to include and assess the impact of 'conveyance routes' across the new development to ease previous concerns about development blocking flood paths.

5.5 They welcome the apparent conclusion that these conveyance routes and other potential mitigation appear to show a possible reduction, albeit minor, across significant areas of the Queen Street and Fowle Hall areas of the Parish east of the Medway Valley railway-line. See extract from Appendix B of the JBA Technical Note (1%AEP +70% Climate change) plan below.

[TWBC: For extract map, please see full representation attached as a supporting document]

The JBA Technical Note concludes

'While this strategic representation of the sites and conveyance routes still shows some areas with increased flood depths, the majority of these areas are within the masterplan area. The modelling demonstrates the benefit of localised drainage measures and it is considered that more comprehensive drainage arrangements accompanied by more detailed analyses would enable the development of the residential sites outlined in Option 1 to be brought forward without any off-site increases in flood depths being predicted. On this basis it is considered that the principle of development can be supported for the layout described by Option 1 (TWBC's preferred Option) provided that appropriate provision is made for the layout of drainage and flow routes through the proposed development. These measures would need to be supported by more detailed analyses that reflected the level of design detail and evidenced that the measures were appropriate. Consideration would need to be given to the long-term management and maintenance of the mitigation measures, so these were not inadvertently compromised for the lifetime of the development.'

5.6 So while it is clear that a potentially significant step forward has been made in terms of modelling Flood Risk much work remains to be done to ensure that the potential level of development and detailed drainage design achieves what is considered theoretically possible in the Technical Note bearing in mind the final caveat of the Technical Note states;

'The layout, form and location of the conveyance routes has been chosen to provide a strategic understanding of the implications of proposed development and should not be used as the basis to define the detailed design or geometry of the measures that will need to be included in the preparation of more detailed development layout designs. It is also possible that there are other mitigation options or measures that could be considered, and the results of the study are not intended to imply that other options would not be appropriate.'

5.7 Yalding Parish Council remains to be convinced that the proposed expansion of Paddock Wood and its environs will not have a resultant knock-on effect on land and property with the Parish Boundary in terms of increased Flood Risk.

5.8 In respect of the River Teise, the SFRA is heavily focused on issues at Paddock Wood and fails to consider the potential surface water impacts of development at Matfield and Horsmonden on the River Teise and no further work appears to have been undertaken since the Regulation 18 Consultation draft.

5.9 A key issue with the SFRA is that in respect of cross-border issues it places emphasis on the development management role rather than seeking to analyse and address potential issues at the local plan examination stage. It is considered unsustainable and ineffective to propose a high level of development in and around a settlement where there are recognised surface water and fluvial flooding issues without consideration of cross-border issues at the local plan stage.

5.10 Pertinently, the continued lack of consideration of cross-boundary issues at this stage does not comply with DEFRA guidance which seeks to address cross-boundary flooding issues at the local plan preparation stage. Overall it is considered that this is an ineffective approach to consideration of flooding matters within the local plan and that the plan is not justified or effective in this regard.

6 CONCLUSION

6.1 Yalding Parish Council recognises there has been a step forward with regard to some aspects of the assessment of flood risk but there remains a worrying lack of consideration of the impact on the River Medway flood plain and a lack of detail and uncertainty in other areas. Leaving the details to application stage is not an effective and justified way to prepare a Local Plan.

6.2 The Local Plan and evidence base is also relatively and unacceptably silent on cross boundary traffic implications regarding the scale and mix of the proposed level of development at Paddock Wood/East Capel, particularly with regards to the concerns of SQW with regard to the on-going structure of the Paddock Wood economy and the availability and location of the workforce needed to service the economy. There is a consequent danger that inward and outward commuting from an expanded Paddock Wood will have considerable impact on the road network through Yalding Parish and this has not been appropriately or effectively modelled.

6.3 The Plan places great emphasis on public transport and active travel measures to mitigate the impact of the development on the local highway network, yet even with these and the proposed highway improvements junctions that provide vital links to the road network to and from Yalding Parish will remain over-capacity and some of these are not proposed to be mitigated in any event. There is no certainty that the public transport and active travel measures will be sustainable and effective in the long term.

6.4 In conclusion, the review of the Regulation 19 Local Plan and its associated evidence base has raised concerns about whether the Local Plan's approach to and the proposed level of development in the Paddock Wood Area is justified and effective in terms of potential cross-boundary implications in particular for Yalding Parish.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here. [PSLP_616_622-625_GSP for Yalding Parish Council_SI-1_Covering Letter_Redacted.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP_616_622-625_GSP for Yalding Parish Council_SI-2_Representation.pdf](#)

Comment

Consultee	Graham Hughes [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Graham Hughes [REDACTED]
Comment ID	PSLP_366
Response Date	25/05/21 10:03
Consultation Point	Map 26 Site Layout Plan (View)
Status	Processed
Submission Type	Web
Version	0.6
Question 1	

Respondent's Name and/or Organisation	Graham Hughes
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Question 3

To which part of the Local Plan does this representation relate?	Paragraph(s)
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

As a long standing Tonbridge resident, educated in Tonbridge with friends and relatives in the area, I am writing to object strongly to TWBC's plans to develop a large 2,800 housing estate on Green Belt land at Tudeley. This will effectively be a large new suburb of Tonbridge with TWBC benefitting from the rates while we Tonbridge residents and Tonbridge and Malling District Council will carry a lot of the extra costs and have to deal with the major problems which will arise. Many of my friends object similarly. TWBC are effectively dumping the adverse effects of this development on Tonbridge residents and TMDC with very little thought and little apparent consultation with TMDC. **The plan cannot have been positively prepared** if it just pushes the resulting problems into the neighbouring Borough.

TWBC have ignored other better, cheaper sensible options across the Borough and gone for an unnecessarily high risk big solution on Green Belt land which breaches the law – the circumstances here are not exceptional circumstances. The plan is **not justified** and the Policy is **unsound**. For 2,800 homes, the plan has not properly considered many factors and as it simply does not work should be scrapped. These factors include:

Affordability – the private houses representing 60% will be relatively small and very expensive. I doubt if enough people can afford to buy these houses in such volumes and who would want to live on a huge, expensive housing estate, with building going on for 20 years? If high prices are not obtainable, the viability of the development will be thrown into doubt. The plan is **not effective or justified** in this regard.

The plan fully acknowledges that the northern part of the site is in a high risk flood area. I have seen many floods in the area with some local roads blocked for days because of the Medway flooding. Surface water run off is another problem with local streams often flooding, a problem exacerbated by the sloping nature of the site. Nowhere near enough attention has been given to these major problems and **the plan is not effective and so is unsound**. I would not want to own a house anywhere near the bottom part of the proposed site. I cannot see this part of the development being sustainable if it is regularly flooded so **the plan is inconsistent with national policy**.

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge B2017 Road and overloading of the already busy roads in Tonbridge, especially in school term time and the peak mornings and evenings. There will be gridlock at peak times. The plan is **not effective** about this issue.

Parking on the development is inadequate and makes little provision for visitor parking. Parking in Tonbridge is already inadequate and cannot cope with the likely increase. With more commuters, no extra trains and no extra parking at the stations, there will be chaos near the station at peak times. Again the plan is **not effective**. The emphasis on more cycling will make little difference - cycling on the busy roads is already dangerous and many accidents will ensue.

One new secondary school and one new primary school combined with a doubling of Capel Primary will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There will be even more pressure from the large number of children from the Capel

and Paddock Wood developments despite the two planned primary schools and expansion of Mascalls. In reality, KCC are not going to invest in all these schools in one small area given the requirements in the rest of Kent and their own cash shortages so there will be a large shortage of school places. Schools will only be built after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and be paid for by someone else.

There are literally no services like electricity and water anywhere near the site – the whole idea of Green belt – so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from the Tudeley development and potentially the Capel development will create major water supply issues, not forgetting sewage issues, the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

For the above reasons, **the plan is flawed and unsound.**

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge Civic Society
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge Civic Society [REDACTED]
Comment ID	PSLP_1274
Response Date	04/06/21 12:50
Consultation Point	Map 26 Site Layout Plan (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Tonbridge Civic Society
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy STR/SS1

Tonbridge Civic Society – the largest amenity society in Tonbridge with almost 500 members – objects to the above proposals, which would have a big impact on Tonbridge and the countryside near it.

The proposal for 2,160 houses in East Capel taken together with the plans for a further 2,800 dwellings in the proposed “garden settlement” dealt with under policy STR/SS3, essentially amounts to a more or less continuous urban sprawl between Tonbridge and Paddock Wood.

This massively increased population will naturally focus for facilities on their nearest significant town, Tonbridge, which will be swamped by this pressure on its roads, railway station, healthcare and the like which are already overburdened by substantial development in the town in recent years, with more proposed in Tonbridge and Maidstone Borough’s own local plan. This is totally unacceptable, particularly given that Tonbridge is in a different borough that will receive none of the rates levied on the new households.

Meanwhile this very substantial development will have a negligible impact on Tunbridge Wells, the centre of the TWBC that will be in receipt of the rates.

We see no evidence in the plan that the impact on Tonbridge has been assessed leave alone addressed

Most of our comments on the Tudely village proposal apply equally to this part of the plan and we would request that those applicable are taken into account here as well.

In addition, we note that this policy proposal casually brushes aside the fact that groundwater levels are high in the northern part of this area due to the proximity of the Upper Medway flood plain. It is clearly environmentally irresponsible to plan such substantial housing development on a flood plain and once again the increased flood risk will impinge on Tonbridge as well as other settlements along the river and not on Tunbridge Wells. We already have more than enough worries on this count

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Juliet Andrew [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Juliet Andrew [REDACTED]
Comment ID	PSLP_975
Response Date	02/06/21 16:48
Consultation Point	Map 28 Paddock Wood and East Capel Structure Plan (published with the permission of David Lock Associates Ltd) (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 3	

To which part of the Local Plan does this representation relate?	Policies Map
--	--------------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Map 28

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a resident in Queens Street Paddock Wood and have lived here since 2010. Since the new developments in Mascalls Farm the traffic has already increased considerably. Further down Queens street the bridges over the railway lines are effectively single lane and there has already been an increase of road traffic accidents since the Mascalls development due to the high volume of traffic travelling over these bridges and on the bends either side.

Our house flooded December 2013 from the downwards journey of the water across the neighbouring concreted yard of the farm adjacent to us. It was able to flow through our house and disperse into the lower ground which is currently apple orchards. This will not be able to happen once the land is developed.

We appreciate the government has a housing target to meet, however we strongly object to the disproportion allocation of development in Paddock Wood. Out of an overall housing target of 12000 dwellings. Paddock Wood is currently being allocated approximately 4000 of these, approximately 1/3 of the total borough's allocation. If we include our neighboring villages, Capel and Tudeley figures our joint allocation is over 6000 dwellings over half of the boroughs target.

The development should be spread across the borough using brown sites, expanding areas such as the Longfield site where millions of government funds has already been spent improving the road infrastructure and where there are community services are more opportunities of work available.

The plans should meet an economic objective– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

Developing housing in Paddock Wood does not improve the local economy. There is no specific industry in the area and despite the rail link with London, the trains are unaffordable for many, overcrowded in peak times with insufficient parking for commuters. (Cost for annual season ticket to mainline terminals plus annual parking ticket is over £6K, however there is a waiting list for parking season tickets due to the lack of spaces).

There are limited options in terms of traffic management around the area. Many of the roads are narrow and unable to be widened due to the flood management ditches and the railway bridges. (We have confirmation from Network Rail that they will not be widening bridges to support more road traffic).

Our understanding is that parking is limited with the new developments and therefore people will end up parking in the already narrow roads leading to further congestion.

The current services such as our doctors, dentists and schools are over subscribed. The local police station has been sold off for development and therefore we would like evidence that these services including the fire services have realistic, plans to be sufficiently scaled to meet the additional demands of an increased population.

There are insufficient plans to meet **a social objective**– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment,

with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

Our experience so far is that our community high street is to be demolished to make way for further development. This is despite the opposition raised by the local community and the rationale of building a new community centre on green space instead of extending our local sports and leisure centre and turning that into a proper community hub rather than a tired sports hall with very little to offer the youth community of Paddock Wood. There are insufficient green spaces and developments in areas such as Foal Hurst Wood will make these over crowded. There is no parking at many of the local parks and the roads into Paddock Wood are too dangerous to allow children to walk along.

The new housing proposals are to be built on land that is subject to flooding. There are flood mapping plans that provide evidence of this. The long term strategy in previous developments around Paddock Wood has been to leave some areas of land for drainage however these have no long term maintenance strategies and in some cases have now been developed. It is clear these strategies are not working as residents across many parts of Paddock Wood are being flooded more than before. We have no confidence in the sweeping statements that flooding issues have been addressed and we would like to understand the compensation that will be provided to the existing and new residents of Paddock Wood when this occurs.

We cannot see how the development supports **an environmental objective**— to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimizing waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

The development of the Church Farm site has already demonstrated the lack of respect for our natural environment. Trees that were subject to planning consent were 'inadvertently' destroyed by the developers.

As mentioned already flooding is of a major concern across Paddock Wood. Residents on the East side of Paddock Wood have had to purchase their pumps due to regularity of flooding down Castle Hill, Mile Oak Road and Queens Street. We are currently surrounded by apple orchards and they are assisting to disperse the run off but if these are developed the situation will be exacerbated.

We would also like to understand if Natural England have been consulted regarding the development proposals as required with a development. The government policy is to protect the best and most versatile (BMV) agricultural land from development. The proposed areas for development (Paddock Wood, Capel and Tudeley) TBWC are the most likely to meet this criteria:

Namely the agricultural land

- . gives the highest yield or output
- . has the widest range and versatility of use
- . produces the most consistent yield from a narrower range of crops
- . requires less input

and this is evidenced by our neighboring farm consistently and successfully growing asparagus see:
<http://publications.naturalengland.org.uk/publication/6056482614804480>

Coupled with this is the government have promised to see hundreds of thousands of new trees planted, including in towns and cities and near rivers to reduce flood risk, and help meet the government's commitment to increase planting to 30,000 hectares per year across the UK by 2025.

A further £1.4 million has been awarded to the Environment Agency to fund 'woodlands for water'— 15 projects to plant over 850,000 trees that will protect around 160km of river and help to reduce the risk of flooding to over 500 properties. Tree planting can play a valuable role in reducing flood risk, slowing the flow of water to nearby communities.

It would seem that removing trees by developing our local orchards is counter productive to government policy.

<https://www.gov.uk/government/news/39-million-to-drive-innovative-tree-planting>

Question 6

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I would suggest that the development across TBWC in more equitable therefore alleviating Paddock Wood from the issues raised above specifically:

Development of arable land when the government has specifically stated that farming must be preserved in the UK. - In other words there are other options in Tunbridge Wells that do not consist of developing farming land

Do not build on the orchards which is contrary to the government directive to plant more trees

Do not create an over populated area around Paddock Woods with poor infrastructure, transport links and public services and little job prospects.

Do not increase the flooding in and around Paddock Wood due by concreting the countryside.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Tammy Thew [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Tammy Thew [REDACTED]
Comment ID	PSLP_90
Response Date	06/05/21 15:00
Consultation Point	Map 28 Paddock Wood and East Capel Structure Plan (published with the permission of David Lock Associates Ltd) (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Mrs Tammy Thew
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1	
Map 28	
2.f	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Having only recently found out that there is an indicative location to put a Gypsy/Traveller site on Ledgers Work, Queen Street, Paddock wood, TN12 6NN, myself and my husband aswell as our neighbours absolutley, vehemently oppose this decision. The Ledgers Works location is directly next door to my property and inbetween my neighbours home. Who in their right mind would consider putting a gypsy/traveller site between 2 residential homes!! Not only would this have a financial impact on our home but it would also deem it unsellable. We have worked very hard for many year for this not to happen.

We brought our property in a rural location for peace and quiet, so not only do we have to contend with the fact that 100's of homes are now proposed to be built directly around our home we have now found out about the traveller site.

Not only am I having sleepless nights thinking about what the decision will be in the future, this is also having a impact on my mental health! I don't want to be back on medication again because someone/people have these ideas but don't think about the impact that it's going to have on the people that live in these areas.

Question 7

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Yes, I wish to be notified of future stages of the Local Plan

Local Plan Regulation 19 representations in document order

**Comments on Section 5: Place
Shaping Policies: Strategic Sites:
Tudeley Village and Paddock Wood,
including land at east Capel: Policy
STR/SS 2: The Strategy for Paddock
Wood Town Centre**

Comment

Consultee	Elisabeth Baker [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Elisabeth Baker [REDACTED]
Comment ID	PSLP_1072
Response Date	03/06/21 12:50
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation	Mrs Elisabeth Baker
---------------------------------------	---------------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR6 2b) Low Traffic Town, possible closure of Paddock Wood Railway Bridge to vehicles as part of the Local Cycling & Walking Infrastructure Plan

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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With particular reference to the sections of the LCWIP page 48 Section 4.12:

Low Traffic Town: The Maidstone Road railway bridge provides the only vehicle access over the railway line in Paddock Wood. Consequently, it is the focus of a high proportion of vehicle trips in the town. The concept of a 'Low Traffic Town' would expand upon the Low Traffic Neighbourhood principle recommended in this report by removing vehicle access over the railway bridge except for bus services. This is likely to reduce the number of vehicle trips in the town which in turn would improve conditions for walking and cycling and create further opportunities for improving the town's streetscapes.

Commercial Road: this is the main high street in Paddock Wood and should be the key public space in the town. Instead, its layout is primarily focussed on accommodating through traffic, providing access to car parks, and enabling access for larger vehicles (>7.5t). Consequently, the resulting streetscape does not fulfil its potential as the key street in the town. To achieve more significant change, the current vehicle access and parking facilities would need to be reviewed and considered for removal to create a healthier, greener, and more attractive High Street. This approach would build upon KCC's previous EATF design arrangement which also removed through access for vehicles.

This is a reprehensible plan for anybody with any mobility issues. I am 79, disabled and cannot walk very far or stand for very long. My granddaughter is 2 and is also disabled. She can neither walk nor cycle, nor is she likely to in future. We live on the same road with the railway bridge between us. In the event of a fall my lanyard would telephone my daughter to come to my assistance but the bridge closure would mean a long detour for her to get to me. This detour would quadruple the mileage she, and many others living on the Hop Farm side of the bridge, would have to drive daily. The closure of a section of Commercial Road requiring disabled people to walk further to access shops would also seriously affect our family and would cause a lack of trade to the local businesses as people would avoid more inaccessible Paddock Wood to shop elsewhere more convenient and accessible.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Elisabeth Baker [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Elisabeth Baker [REDACTED]
Comment ID	PSLP_1098
Response Date	03/06/21 14:36
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Elisabeth Baker
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS2	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I have lived in the same house in Paddock Wood for 45 years. It used to be a pretty town. The fields and countryside were everywhere and it felt very rural; now the entire town is a mass of over development. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy. The current town population of Paddock Wood is over 8,000 people and with approximately 3,500 houses planned in Paddock Wood and another 2,800 in Tudeley 2 miles away, the local population is likely to be flooded with another 12,000 plus people. It cannot continue. We do not need another 150% of our population added to our town. As the town expands the flooding will only get worse as trees, hedges and drainage ditches are removed or concreted over. Traffic is terrible, particularly during rush hours and school drop-off/collection times. East Capel and Tudeley are small villages; they don't have the infrastructure to be able to take on anything like this size of over-development. It will ruin the current villages and Paddock Wood. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level. We should use Brownfield sites rather than dumping 6,000 new houses in an area of outstanding natural beauty that has historically been productive farming land, and which protects Paddock Wood from flooding.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lynn Ball [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Lynn Ball [REDACTED]
Comment ID	PSLP_634
Response Date	28/05/21 10:42
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Lynn Ball

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I wish to object to the proposed closure of Paddock Wood railway bridge and Commercial Road to traffic.

As your report points out Maidstone Road is the main vehicle route into the village, closing this route will only lead to congestion elsewhere.

I live in Laddingford, Paddock Wood is my nearest shopping destination which is only easily accessible by car.

What would be the preferred route to Waitrose from any direction?

Darman Lane and Queen Street is not suitable for increased traffic flow and what would be the suggested route for traffic entering Paddock Wood from Five Oak Green or Tunbridge Wells?

Warrington Road and Old Kent Road are both residential areas, both would be used by the increased traffic.

Closing Commercial Road to traffic will also have a detrimental effect on the retail businesses there, surely a greater enforcement on roadside parking would be a better option.

Trying to make Paddock Wood a 'low traffic town' is rather ironic in view of the huge volume of residential property being built.

Encouraging residents to cycle and walk is to be commended but this must be achieved without detriment to those having to use the car when visiting Paddock Wood.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_136

Comment

Agent	Mr Jonathan Buckwell ()
Email Address	
Company / Organisation	DHA Planning Ltd
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Consultee	()
Company / Organisation	Barth-Haas UK Ltd
Address	 Paddock Wood TN12
Event Name	Pre-Submission Local Plan
Comment by	Barth-Haas UK Ltd ()
Comment ID	PSLP_2020
Response Date	03/06/21 12:06
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	DHA Planning for Barth-Haas-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Barth-Haas Uk Ltd
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

[TWBC: the full representation attached has been divided into Policies STR/SS1 (PSLP_2019), STR/SS2 (PSLP_2020), Policy ED2 (PSLP_2021), Vision and Strategic Objectives (PSLP_2022), Policies STR1 (PSLP_2023), STR3 (PSLP_2024) and STR4 (PSLP_2025)]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of Barth-Haas UK Ltd (herein 'BarthHaas') in respect of the Tunbridge Wells Borough Council Pre-Submission (Regulation 19) Local Plan (PSLP) consultation.

1.1.2 These representations relate to BarthHaas' existing site at Hop Pocket Lane, Paddock Wood.

1.2 The site

1.2.1 The site comprises the Barth Haas UK headquarters and production facility, which is located east of Hop Pocket Lane in Paddock Wood.

1.2.2 Barth Haas UK forms part of the Barth Haas Group – who are the world's largest supplier of hop products and services. It operates across all continents and provides support to its customers and partners throughout the production and sale cycle. This includes research and development, breeding /growing and marketing. As is recognised in PSLP paragraph 5.236, Paddock Wood evolved around the production of hops, and so as a company who continue to trade in hop products, BarthHaas provides an important link with the history of the town, as well as being an important local employer in its own right.

1.2.3 Our client is currently considering options to expand their facilities. This is likely to require relocation, with an alternative location in or close to Paddock Wood preferred, which will then free up the site. The existing premises are dated and no longer suit the needs of modern businesses – especially being an imposing five storey building – it is likely that the site would need to be redeveloped in order to be attractive to future occupiers.

1.2.4 The extent of the site is shown in Figure 1 overleaf.

[TWBC: for Figure 1: Site Location Plan see full representation attached]

1.2.5 The site was promoted for development through a response to the Regulation 18 consultation draft Local Plan.

1.2.6 The site is very close to both the town centre and the railway station, the latter being accessible via a pedestrian access point immediately south of the site.

1.2.7 The site was assessed by the Council as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA). This concluded that the site could be suitable to be redeveloped to accommodate between 40 and 140 dwellings. The SHELAA concludes that the site is suitable, available and deliverable for such a use, and is in a sustainable location. It is therefore suitable to be allocated for this form of development.

1.2.8 Strategic Sites Masterplanning and Infrastructure Main Report paragraph 4.152 also recognises that some other town centre uses (e.g. retail and leisure) may also be appropriate in this location.

1.3 Local Plan Background

1.3.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.3.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3.3 This submission comments on the plan having regard to these tests of soundness as well as wider legal compliance.

1.4 Legal Compliance

1.4.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.4.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.4.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.5 Assessment of Soundness

1.5.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough.

It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.5.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.5.3 This representation comments on the following elements of the plan:

- Vision and Strategic Objectives;
- Development Strategy and Strategic Policies;
- Place Shaping Policies; and
- Development Management Policies.

Place Shaping Policies

1.5.15 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

Policy STR/SS2

1.5.20 This policy sets out a strategy for the town centre as defined on Inset Map 5. Whilst the Strategic Sites Masterplanning and Infrastructure Main Report identifies the existing BarthHaas site as potentially falling within an expanded town centre, the site is excluded from the town centre as defined on Inset Map 5 and Map 30.

1.5.21 Whilst it is recognised that the town centre is currently located wholly to the south of the railway, if BarthHaas were to relocate from their existing premises this would create a potential development site immediately north of the station, as recognised in the PSLP. Whilst the primary use of this site is expected to be residential, which does not require a town centre location, there may also be scope for an element of town centre uses on this site, especially on the ground floor. This is especially so given its location opposite the station, and on the side of the station most likely to be used by residents of the Paddock Wood strategic extensions accessing the station on foot or by bike.

1.5.22 We therefore **COMMENT** that it may be appropriate to extend the town centre boundary to cover the BarthHaas site, as suggested in the Strategic Sites Masterplanning and Infrastructure Main Report, in the interests of flexibility and good planning.

1.6 Summary and Conclusions

1.6.1 In summary, this representation has been prepared on behalf of BarthHaas in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.6.2 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, and especially the identification of the existing BarthHaas site as being suitable for residential-led development.

1.6.3 However, we object to the wording of Policy ED2 for the reasons set out above.

Question 6

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1.5.22 We therefore **COMMENT** that it may be appropriate to extend the town centre boundary to cover the BarthHaas site, as suggested in the Strategic Sites Masterplanning and Infrastructure Main Report, in the interests of flexibility and good planning.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_97

Comment

Agent	David Murray-Cox [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Turley
Address	[REDACTED] [REDACTED] Reading [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Bellway Homes Strategic
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Bellway Homes Strategic [REDACTED]
Comment ID	PSLP_1756
Response Date	04/06/21 12:23
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1747-1748, 1750-1756, 1758_Turley for Bellway Homes_Representation_Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Bellway Homes Strategic
Question 2	
Agent's Name and Organisation (if applicable)	Turley
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

[TWBC: for further comments by Bellway Homes Strategic, please see Comment Numbers PSLP_1747-1748, PSLP_1750-1756, PSLP_1758]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TUNBRIDGE WELLS PRE-SUBMISSION LOCAL PLAN – REPRESENTATIONS ON BEHALF OF BELLWAY

We write on behalf of our client, Bellway Homes Strategic, in relation to the Pre-Submission draft Local Plan for Tunbridge Wells Borough which is currently subject to public consultation. This letter provides the background to Bellway's interest in the Borough and sets out representations on their behalf.

BACKGROUND

Bellway has a legal interest in the land to the north and south of High Woods Lane (Mouseden Farm) on the eastern edge of the built up area of Tunbridge Wells/Hawkenbury which it is promoting for residential led development. The site is separated by High Woods Lane. The area south of High Woods Lane is currently in agricultural use and bordered to the east by woodland, to the south by existing sports uses and to the west by existing residential development. The area north of High Woods Lane is also within agricultural use, with further agricultural uses/woodland to the east and an indoor bowls club and allotments to the west.

The adopted Proposals Map indicates that both parts of the site are within the Green Belt and AONB.

On the basis of the Proposals Map published as part of this consultation indicates that the southern part of the land (south of High Woods Lane) is to be designated under Policy RTW1923 with that area to adjoin the 'Proposed Limited to Built Development'. The northern part of the land promoted by Bellway is not subject to any other proposed allocations. The draft Proposals Map appears to indicate that both parts of the site will continue to be located within the Green Belt and AONB.

Policy STR/SS 2: Tudeley Village

The draft Local Plan proposes a standalone garden settlement (referred to as Tudeley Village) where 2,100 dwellings are expected by the Council to be delivered in the Plan period). We have set out

comments on the deliverability of this site elsewhere in these representations and reserve the opportunity to comment in greater detail if this site is retained in subsequent versions of the Local Plan.

This development is to be focused on the very small settlement of Tudeley. It is clear that the existing settlement comprises a small number of dwellings with very limited facilities. This view is reinforced by the text in the draft Local Plan. Although the railway line runs between the site of the proposed garden settlement, Tudeley is not served by a railway station and the nearest stations are at Tonbridge (approximately 4km to the west or Paddock Wood (approximately 7.4km to the east).

The Policy does not include any requirements for the garden settlement to provide a new railway station, despite the text at 5.218 of the draft Local Plan which refers to the 'opportunity' for the provision of a station.

On the basis of this policy context and the description of Tudeley in the draft Local Plan, our interpretation is that the area would, in normal circumstances, be considered to be a wholly unsustainable location for the scale of growth envisaged in the emerging Local Plan. There are very little facilities or employment opportunities in the area and the existing public transport opportunities are limited. The Council's approach appears to be that the garden settlement itself may deliver employment uses and facilities and that links to other settlements will be provided.

Bellway contend that the steps required to make Tudeley Village a sustainable location for the scale of growth envisaged are significant. The Council cannot have certainty that employment uses will be forthcoming in a manner which reflects housing delivery or that those uses will be sustained in this inaccessible area over the longer term. Whilst the Council seeks to ensure that the allocation supports the use of public transport opportunities to other settlements, it is highly likely that the garden settlement itself will continue to generate a significant level of trips by car to other locations.

It is clear that there are other, alternative options (such as the land at Mouseden Farm) which are capable of providing new homes in areas which are closer to a range of existing services and facilities which can be enhanced and can facilitate access via public transport, walking and cycling.

Bellway consider that Tudeley Village will support the delivery of a strategic scale development which is fundamentally in the wrong place.

In addition to the specific points set out above, Bellway consider that there is no clear explanation within the Council's evidence base to explain why the Tudeley Village option has been selected and other options discounted. The area in which Tudeley Village is located in the Green Belt, as is the site promoted by Bellway at Mouseden Farm, however in the case of Tudeley Village, this does not support sustainable patterns of development and does not build upon existing facilities whereas the delivery of additional recreation at High Woods Lane would. Indeed the Council have acknowledged this as a solution by securing planning permission but cannot deliver it, so why a residential allocation to facilitate such needed recreational facilities is not being supported by the Council is a mystery.

We note that the SHELAA assessment of Tudeley Village (site 448) appears to be based upon assumptions about what services and facilities the development could provide. For example the SHELAA states "The Services and Facilities objective scores positively reflecting the likely well thought-out provision in the new settlement as a result of the master planning process. The settlement also benefits from the proximity of enhanced provision at the nearby North Farm retail park, Tonbridge and Royal Tunbridge Wells.". The SHELAA also refers to "A positive score for travel is applied following a similar logic to air quality whilst also considering new bus routes and relatively easy access to train stations.

However, as we establish above, Tudeley is not served by a railway station and the nearest stations are at Tonbridge (approximately 4km to the west or Paddock Wood (approximately 7.4km to the east).

Whilst the SHELAA analysis of site 448 found the site "is considered suitable as a potential Local Plan allocation subject to further consideration", it also found that "The site is in the Green Belt: the TWB Green Belt study (2017) identified that the harm caused by the release of land in this broad parcel is 'high'."

Bellway consider that the Council's proposed allocation of a garden settlement at Tudeley Village is fundamentally unsound. The location of this site is remote and it does not benefit from a railway station. Although there are stations in the area, these are some distance away and the garden settlement appears to be predicated on the basis that a movement strategy will be implemented to access these. That primarily relies on new road links

It is clear that the policy sets a complex and complicated level of requirements which will take time to address before any permission can be granted and in combination with the need for infrastructure delivery, demonstrates the need for caution to be exercised in relation to the site's overall delivery.

SUMMARY

These representations set out **significant concerns** regarding the draft Local Plan for Tunbridge Wells Borough. In summary, the level of housing required to address issues of affordability and does not provide any realistic opportunities to make a meaningful contribution to meeting affordable housing needs. Whilst the Council claims that the housing supply represents a buffer over the planned requirement, this is based on extremely optimistic assumptions and short lead in times before the key sites deliver. In the case of Paddock Wood the Plan then relies upon very high delivery rates.

A more diverse and greater range of sites are required to address affordability, provide affordable housing and to help ensure that the housing requirement is achievable.

The Plan also provides a disproportionately low level of new housing at Tunbridge Wells despite the sustainability of this settlement, in comparison to other, less sustainable locations. This is borne out by the selection of the Tudeley Village site as a location for a new garden village in a remote location where the extent of measures to support sustainable travel is extremely unclear. Alternative options are available which would direct development to the most sustainable settlement (i.e. Tunbridge Wells) and which are in sustainable locations.

This conclusion is supported by the Council's own evidence which demonstrates the availability and suitability, sustainability and logic of alternative sites on the edge of Tunbridge Wells (including the land promoted by Bellway which is subject to these representations).

The Council's own evidence has overstated the contribution that certain sites, including the land promoted by Bellway which is subject to these representations) makes to the Green Belt. When the land is assessed in a more robust manner (and when assessed independently rather than as part of wider Broad Areas), the contribution is significantly reduced.

The southern part of the land promoted by Bellway (i.e. the land south of High Woods Lane) is subject to a planning permission for recreational uses. That application was submitted by the Borough Council, despite it having no interest in the land. In contrast, Bellway has a legal interest in the land and is promoting this area, as part of a wider site, for residential development. Bellway would be willing to work with the Borough Council to explore opportunities for bringing forward the approved recreational facilities in the area, which residential development on the site could help deliver.

Whilst the Council is pursuing (by allocating and seeking planning permission) land outside of its control for sports and recreation uses, it is concurrently planning to release a number of sites which are already within those uses for residential development which the Council does own. As a matter of general principle this approach appears unjustified.

As it is currently drafted the Local Plan is unsound. It relies on unsustainable and undeliverable solutions to housing needs and is partly premised on releasing the Council's own land for housing whilst proposing land it does not own for compensatory sports and recreation purposes. These fundamental issues of unsoundness are compounded by a lack of documentary evidence to explain why the Council has selected the approaches and proposed allocations in the emerging Local Plan.

Bellway would be willing to enter in to dialogue regarding the land north and south of High Wood Lane and the extent to which this site could deliver housing (delivering the greater range and diversity of sites) in a sustainable location. Bellway would be willing to discuss the manner in which such housing could assist in delivering additional recreational facilities in the area.

[TWBC: for full representation, please see supporting documents]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

If you would like to attach a file in support of your comments, please upload it here. PSLP 1747-1748, 1750-1756, 1758 Turley for Bellway Homes Representation Redacted.pdf

Comment

Consultee	Rosaleen Boardman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rosaleen Boardman [REDACTED]
Comment ID	PSLP_948
Response Date	02/06/21 12:28
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Rosaleen Boardman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please accept this as my response to the consultation by Tunbridge Wells Borough Council on the Pre-submission Local Plan.

I understand the need to provide more housing but the impact on the local infrastructure needs to be taken into account.

In particular, I am very concerned about the proposed closure to cars of part of Maidstone Road in Paddock Wood. I live on the north eastern outskirts of Paddock Wood and always use this route into Paddock Wood. However, if this road closure goes ahead, I will have to make a detour of a quite a few miles along the already busy A228 Whetsed Road and then the similarly busy Badsell Road past the new housing estate to join the queuing vehicles at the controlled traffic lights joining Maidstone Road near Mascalls School. There will be a substantial increase in traffic flow with cars and commercial vehicles using this detour - you just have to stand on the street near to the proposed closure by the bridge to see how many cars and tradesmen use the direct Maidstone Road route through town. People are going to get fed up with the hold ups and will probably drive onto Tonbridge to do their shopping there which will have a significant impact on the retail trade for the independent shops in the High Street in the northern part of Paddock Wood.

There is also the increased level of air pollution which will occur in a large residential area as cars are waiting on Badsell Road to get onto Maidstone Road

Please use some common sense and review this road closure proposal.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Joshua Boyle [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Joshua Boyle [REDACTED]
Comment ID	PSLP_1170
Response Date	03/06/21 22:21
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Joshua Boyle
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not positively prepared

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The closing of the Railway Bridge and the Pedestrianisation of Commercial Road, whilst also not creating more dedicated retail space would be disastrous for local business and people. It would also carve what would become the "old town" in two.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Don't do it

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: . No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter & Veronica Bryant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter & Veronica Bryant [REDACTED]
Comment ID	PSLP_1431
Response Date	03/06/21 21:17
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Peter & Ronnie Bryant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please accept this letter as my response to the consultation by TWBC on the Pre-Submission Local Plan.

Following my previous letter of October 2019 in response to the Local Plan I wish to make further concerns as follows:

The impact of the road network between Paddock Wood and Tonbridge would be considerable as traffic is already heavy especially at high peak times. The closure of Hartlake Road would also contribute to additional build up and congestion in the Tonbridge area.

Tonbridge Station already accommodates huge numbers of commuters and is used for large number of school children. Additional housing would inevitably increase usage of this station. Car parking in Tonbridge is limited to the numbers of cars wishing to use local facilities, an increase of cars wishing to park for commuter purposes would only cause further parking problems.

Flooding continues to be of great concern for the low-lying villages as green fields are used for housing.

To use these green fields for housing and destroying the lovely countryside is in my view an act of vandalism by TWBC.

I wish you to reconsider this Local Plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Dr Colin Buchanan [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Dr Colin Buchanan [REDACTED]
Comment ID	PSLP_1392
Response Date	04/06/21 07:18
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Dr Colin Buchanan
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I write to express my dismay and disgust that you should even consider closing this road to through traffic. For more than 25 years this has been my regular route from East Peckham through to Tonbridge in the morning (variably 7.30 to 9.30 AM), en route to the station. I have not noticed any obvious increase in traffic over that period. It is a delightful uncongested route through the beautiful local countryside, avoiding the congested alternative via the busy East Peckham bypass and through Whetsted and Five Oak Green, through the school traffic and roadside parked cars. The alternative would be to enter Tonbridge from the Hadlow Road and join a trail of cars backing up from the traffic lights. These experiences relate to the occasional temporary closure of Hartlake Road because of surface floodwater in the winter.

The only people who will benefit from the Road closure will be the very few who live at either end of the road, and even then they may have to make unnecessary detour for their planned journey depending on which direction they would be travelling.

I wish also to express my anger that this proposal has not been made widely known to the public who may use the road, having only learnt yesterday of this proposal from a friend. The loss of such a longstanding public thoroughfare should be prevented in the public interest.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Alastair & Christine Byron [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Alastair & Christine Byron [REDACTED]
Comment ID	PSLP_876
Response Date	24/05/21 09:44
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Alastair & Christine Byron
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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We are greatly puzzled and dismayed to learn of the proposal to restrict the entry from Watlingtonbury to bus traffic only. Many like us in Watlingtonbury regularly use this route as the most direct. We value the selection of shops in Paddock Wood.

How would it benefit the environment to make our journey longer and therefore use more fuel? The bus is not possible for us since with heavy shopping we could not carry it the half mile up hill to our home.

Please think again and reject this proposal.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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Comment

Consultee	Susan Cranmer [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Susan Cranmer [REDACTED]
Comment ID	PSLP_1437
Response Date	03/06/21 19:42
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Susan Cranmer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am writing to object to the closure of Hartlake Road Tudeley.

I use this road on a regular basis four to five times a week. Despite me using Hartlake Road I was also a Tudeley resident for most of my life. I can confirm that the road was busier during the lockdown when more people were parking their cars by the Hartlake Bridge and using the river for recreation or walking but since the lifting of lockdown the road is back to its normal flow of vehicles.

If this road is closed that will mean a round trip to get to Tudeley via Hadlow Road, the industrial estate and Tudeley Lane which is congested and time consuming due to the traffic stop start, especially during peak times. I would say this would put 30 - 40 minutes extra time on my journey, which would be over an hour round trip.

The Poacher Pub will lose customers and the surrounding restaurants in the Tudeley area.

Hartlake Road is not used as a 'rat run' but genuinely used by people that need to make a journey into or through Tudeley or back into the Golden Green area.

By closing Hartlake Road there is not another route that you can use to get from a to b. You have to completely change your journey which increase air pollution, makes other roads much more busier, time consuming and costly.

Hartlake Road should not be closed and to even consider it is outrageous. It serves no purpose but to push traffic onto the busier road of Hadlow Road and clogging up Tonbridge even more or having cars driving through East Peckham which is a narrower road, more congested and with more residents, many of whose houses sit literally on the side of the road.

Whereas Hartlake Road residents houses are all sited further back from the road and they do not feel the impact as much of cars passing their door.

I strongly oppose to the closure of Hartlake Road.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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Comment

Consultee	Mrs F Duke [REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs F Duke [REDACTED]
Comment ID	PSLP_1110
Response Date	01/06/21 09:00
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Letter
Version	0.6
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs F Duke
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My name is Mrs F Duke of the above address. I am writing to you with regards to the proposed closure of the Railway Bridge to cars. I have lived at my current address for over 50 years and have always been happy to walk to the village whenever it was possible for me to do so. Unfortunately I am no longer able to walk very far and rely on Family, Friends and G4 to take me shopping and to appointments that I need to go to. My children live on the south side of Paddock Wood so use the bridge to come and collect me to take me to Waitrose shopping each week. At the moment it is a quick and easy journey to collect me or to get to me in an emergency, but if they are unable to use the bridge it will be a much longer and drawn out journey that will cause more pollution rather than less. It will also be at least a 10 minute drive on a good day to get to the Doctors rather than the current 3 minutes. Where is the sense in this decision? I already feel that I am cut off due to my needing help to get anywhere and this decision if it goes ahead will only make me more cut off.

Please re think this decision as in my opinion it will cause more pollution problems and traffic jams in the area than leaving it as it is.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Mrs K Bell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	East Peckham Parish Council
Address	The Jubilee Hall Pippin Road TONBRIDGE TN12 5BT
Event Name	Pre-Submission Local Plan
Comment by	East Peckham Parish Council [REDACTED]
Comment ID	PSLP_1094
Response Date	03/06/21 09:33
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	East Peckham Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Further to the earlier submission by East Peckham Parish Council. East Peckham Parish Council now wishes to put on record our concerns and strong objections to the suggested possibilities (however remote and medium to long-term they may be) at paragraph 4.12 of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the closure to all vehicular traffic, except buses, of the Maidstone Road Railway Bridge and to close Commercial Road to through traffic in effect reinstating measures that had been installed by KCC and subsequently removed.

It is the view of East Peckham Parish Council that this is likely to render access to Paddock Wood Town Centre and its services very problematic for residents of East Peckham, forcing them to use unsuitable rural lanes to the east of Paddock Wood or onto the congested A228 Whetsted Road and B2017 Badsell Road to gain access to the Town Centre and local services. The Parish Council notes that the above possibilities do not appear in the costed proposed set of cycling and walking improvements that are set out in the LCWIP and would hope that the possibilities set out at paragraph 4.12 are nothing more than speculative.

East Peckham Parish Council also notes the possibility of introducing a new bridge and link over the railway to the west of the Town Centre to provide easier access to the northern employment areas and reduce traffic on Maidstone Road, but recognises that this will require extensive discussions between the various landowners/developers and Network Rail.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Mr Jonathan Easteal [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Jonathan Easteal [REDACTED]
Comment ID	PSLP_1406
Response Date	04/06/21 15:32
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Jonathan Easteal
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 2 The Strategy for Paddock Wood Town Centre	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I do not believe the proposal to close Maidstone Road to traffic is sound. It will put residents to huge inconvenience as well as causing drivers to drive even further to get out of town on the north side. Proposals for restricted access on Commercial Road will likewise cause huge inconvenience to residents. I don't believe these plans are reasonable nor proportionate.

They have been developed to solve a problem that I don't believe exists.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plans for Maidstone and Commercial road should not be approved.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	. No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anja Ennis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anja Ennis [REDACTED]
Comment ID	PSLP_1065
Response Date	03/06/21 12:38
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.5
Question 1	

Respondent's Name and/or Organisation	Mrs Anja Ennis
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR6 2b) Low Traffic Town, possible closure of Paddock Wood Railway Bridge to vehicles as part of the Local Cycling & Walking Infrastructure Plan

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

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With particular reference to the sections of the LCWIP page 48 Section 4.12:

Low Traffic Town: The Maidstone Road railway bridge provides the only vehicle access over the railway line in Paddock Wood. Consequently, it is the focus of a high proportion of vehicle trips in the town. The concept of a 'Low Traffic Town' would expand upon the Low Traffic Neighbourhood principle recommended in this report by removing vehicle access over the railway bridge except for bus services. This is likely to reduce the number of vehicle trips in the town which in turn would improve conditions for walking and cycling and create further opportunities for improving the town's streetscapes.

Commercial Road: this is the main high street in Paddock Wood and should be the key public space in the town. Instead, its layout is primarily focussed on accommodating through traffic, providing access to car parks, and enabling access for larger vehicles (>7.5t). Consequently, the resulting streetscape does not fulfil its potential as the key street in the town. To achieve more significant change, the current vehicle access and parking facilities would need to be reviewed and considered for removal to create a healthier, greener, and more attractive High Street. This approach would build upon KCC's previous EATF design arrangement which also removed through access for vehicles.

This is a reprehensible plan for anybody with any mobility issues. My daughter is 2 and has many health problems. She can neither walk nor cycle, nor is she likely to in future. My mother is 79 and cannot walk very far or stand for very long. We live on the same road with the railway bridge between us. In the event of a fall her lanyard would telephone me to come to her assistance but the bridge closure would mean a long detour for me to get to her. This detour would quadruple the mileage I, and many others living on the Hop Farm side of the bridge, would have to drive daily. The closure of a section of Commercial Road requiring disabled people to walk further to access shops would also seriously affect our family and would cause a lack of trade to the local businesses as people would avoid more inaccessible Paddock Wood to shop elsewhere more convenient and accessible.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anja Ennis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anja Ennis [REDACTED]
Comment ID	PSLP_1095
Response Date	03/06/21 14:23
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Mrs Anja Ennis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS2	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

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I have lived in Paddock Wood for 40 years. It used to be a lovely town. The fields and countryside were stunning and it felt very rural; now the entire town is a mass of concrete. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy. The current town population of Paddock Wood is about 8,400 people and with approximately 3,500 houses planned in Paddock Wood and another 2,800 in Tudeley 2 miles away, the local population is likely to be flooded with another 12,000 plus people. It is unsustainable. As the town expands the flooding will only get worse as trees, hedges and drainage ditches are removed or concreted over. Traffic is terrible, particularly during rush hours and school drop-off/collection times. East Capel and Tudeley are small villages; they don't have the infrastructure to be able to take on anything like this size of over-development. It will ruin the current villages and Paddock Wood. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level. We should use Brownfield sites rather than dumping 6,000 new houses in an area of outstanding natural beauty that has historically been productive farming land, and which protects Paddock Wood from flooding.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

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Comment

Consultee	Duncan Ennis [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Duncan Ennis [REDACTED]
Comment ID	PSLP_1080
Response Date	03/06/21 13:23
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.4

Question 1

Respondent's Name and/or Organisation	Mr Duncan Ennis
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR6 2b) Low Traffic Town, possible closure of Paddock Wood Railway Bridge to vehicles as part of the Local Cycling & Walking Infrastructure Plan

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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With particular reference to the sections of the LCWIP page 48 Section 4.12:

Low Traffic Town: The Maidstone Road railway bridge provides the only vehicle access over the railway line in Paddock Wood. Consequently, it is the focus of a high proportion of vehicle trips in the town. The concept of a 'Low Traffic Town' would expand upon the Low Traffic Neighbourhood principle recommended in this report by removing vehicle access over the railway bridge except for bus services. This is likely to reduce the number of vehicle trips in the town which in turn would improve conditions for walking and cycling and create further opportunities for improving the town's streetscapes.

Commercial Road: this is the main high street in Paddock Wood and should be the key public space in the town. Instead, its layout is primarily focussed on accommodating through traffic, providing access to car parks, and enabling access for larger vehicles (>7.5t). Consequently, the resulting streetscape does not fulfil its potential as the key street in the town. To achieve more significant change, the current vehicle access and parking facilities would need to be reviewed and considered for removal to create a healthier, greener, and more attractive High Street. This approach would build upon KCC's previous EATF design arrangement which also removed through access for vehicles.

This is a ridiculous plan for anybody with any mobility issues. My daughter is 2 and is disabled. She can neither walk nor cycle, nor is she likely to in future. My mother-in-law is 79 and cannot walk very far or stand for very long. We live on the same road with the railway bridge between us. In the event of a fall her lanyard would telephone my wife to come to her assistance but the bridge closure would mean a long detour for us to get to her. This detour would quadruple the mileage I, and many others living on the Hop Farm side of the bridge, would have to drive daily. The closure of a section of Commercial Road requiring disabled people to walk further to access shops would also seriously affect our family and would cause a lack of trade to the local businesses as people would avoid more inaccessible Paddock Wood to shop elsewhere more convenient and accessible.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sarah Goodall [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Sarah Goodall [REDACTED]
Comment ID	PSLP_1398
Response Date	03/06/21 17:29
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Sarah Goodall
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I write to register my objection to the ludicrous plan to close Hartlake Road permanently to through traffic.

It is a vital access route between the villages, for residents and businesses alike. The disruption to all the businesses along there would quite probably lead to their undoing - as if Covid 19 hasn't already caused enough heartache and pain.

As a long term resident of Tonbridge, as well as a local business owner I strongly object to such a disruptive move.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

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Comment

Consultee	Mrs D Green [REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs D Green [REDACTED]
Comment ID	PSLP_1106
Response Date	01/06/21 09:00
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Letter
Version	0.9
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs D Green
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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My name is Mrs D Green of the above address, where I have lived for 34 years and previously for 20 years on the North side of Paddock Wood on Maidstone Road.

I am writing to you with regards yours plans to close the Railway Bridge to all traffic except Busses. I find this idea a bad one for many reasons but the main one is that my Mother who needs help to get anywhere, as she can no longer walk far due to ill health lives on the North side of the bridge. I walk to her if I am just visiting, but if she needs shopping or to be taken anywhere, or even calls us in an emergency it is currently quick for us to get to her by car. If your plans go ahead it will take at least 10 minutes to get to her on a good day if the traffic is good, if not longer. This frightens me.

The proposed plans in my opinion will cause far more congestion and pollution in and around Paddock Wood and are not going to make life better for the residents of the area and are just cutting off one side of the area from the other. This is not acceptable in my view.

By all means cut the speed limit if this will make the area safer but not residents off from each other.

I hope you seriously reconsider this decision as in my opinion it is definitely the wrong one.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Mrs Sharon Benita Gregory [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Sharon Benita Gregory [REDACTED]
Comment ID	PSLP_1436
Response Date	03/06/21 16:43
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Sharon Benita Gregory
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 2 The Strategy for Paddock Wood Town Centre	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No
Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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This plan which proposes to prevent all vehicles except buses travelling to Paddock Wood via Maidstone Road has not been positively prepared. It has penalised a section of people living in the East Peckham, Maidstone direction. It is not effective because all that will happen is a larger volume of traffic will be forced onto an alternative route, via Five Oak Green direction. This is a heavily used road already without redirecting more traffic to it. It does not also take into account the large volume of residential development in that area which will have its own increase in traffic.

This major proposal has also not been widely advertised. Even Paddock Wood Town Council learned of it only recently. Such a change should be well advertised and a formal meeting held inviting all those concerned.

I support improved areas for cycling and pedestrians, however not everyone is physically able to adopt this method of transport, and public transport in this direction is an expensive alternative and has a very limited timetable. I cycled to Paddock Wood from East Peckham for some years, and asked for a cycle path from that direction but it would seem that was never a possibility. I therefore continued to cycle the journey, sharing with all manner of vehicles. The road speed could be reduced for safety, ie 40mph instead of 50-60mph.

The proposals do not take into account how people will be able to get to the Waitrose car park Paddock Wood for example if they proposed to close Commercial Road from the East Peckham direction. Cycling is all very well but you cannot shop for a family of 4 or 5 on a bicycle, therefore this plan has forgotten reality.

The proposed scheme may have looked at other towns for comparison, but the road system in Paddock Wood is much smaller in the variety of options available, and really cannot be used in the same way.

The amount of housing which is being added to the outskirts of the town will lead to more car users because of the distance to the centre.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is a fact that idling traffic stuck in jams creates more pollution than when traffic can flow through areas. The road leading to the bridge is blocked a lot of the time by parked cars which creates a hold up in both directions. I sympathise with those that park there but I believe there should be an allocated parking area off-road, perhaps on land which is vacant (ie near the dentist practice). It should also restrict parking during peak times to enable traffic to flow. I believe many other town centres would not have allowed parking on such a key road as has happened into Paddock Wood.

With regard to proposal of 20mph speed limits, I would like to add that the general public needs to be re-educated on the current range of speed limits, ie 30mph, 40mph, 50mph and so on. 20mph in a car is not a realistic one, and even a fast cyclist would probably travel faster than this.

The road speed where cyclists and vehicles share could be reduced for safety, ie 40mph instead of 50-60mph which would not inconvenience drivers too much if adhered to.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

There are major changes to residents and it needs a wide audience.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Zoe Harrison [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Zoe Harrison [REDACTED]
Comment ID	PSLP_309
Response Date	24/05/21 11:19
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Zoe Harrison
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/PW 1 The Strategy for Paddock Wood	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

[TWBC: the following comment received by email on 20 May 2021]:

I wish to state my strong objections to the completely ridiculous ideas laid out in your plans for Paddock Wood. Whilst urging people in roadside banners to "shop local" you are proposing a high street with no traffic allowed to pass through it and to shut the bridge which is the main route into Paddock Wood for anyone living that side or in surrounding villages.

By doing so, people will simply get in their cars and go elsewhere which will destroy the village and the lovely independent shops we have here as without allowing vehicle access, people will not shop local! You also state only buses will be allowed to go over the bridge, what about emergency vehicles? The bus service is so dire here, it's beyond expensive and stops ridiculously early so is really not feasible to expect people not to drive!!

Please see some sense, we have numerous amazing country lanes for people to cycle in, doing this stupid and crazy plan will cause people to actually travel further in their cars, as they will just avoid the area, thus increasing pollution further.

A petition has been started against your ridiculous plan on facebook and within a few hours has amassed nearly 200 signatures, this will continue to grow and you need to take people living in the village opinions into account, not just focus on funding!!

[TWBC: the following representation received by email on 24 May 2021]:

The plan to close the High Street in Paddock Wood and the railway bridge to all vehicles except buses has not been thought through at all. It is a completely ridiculous suggestion quite frankly. Given that the reason, according to your strategy for housing development paragraph 4.4, is that Paddock Wood has been chosen for over 3500 additional houses because of it's "main road links", you are now proposing to close one of these off completely!

Under your proposed scheme anyone living the other side of Paddock Wood will no longer be able to enter via the railway bridge into the town but will instead be sent on a good couple of miles detour and end up down Badsell Road (which will already be suffering from clogged up traffic due to all the new housing being put in there) This is going to cause traffic chaos with cars being backed up to the Colts Hill roundabout and surely the whole point of this "Active walking/cycling plan" is to reduce pollution, here you are just creating it by having people travel further to get to where they want to go and engines idling in built up traffic as there will be only one route into and out of Paddock Wood.

The closure of Paddock Wood High Street to traffic will be the death of all of the local independent shops we have and where the council have put signs up around the town encouraging everyone to "shop local" it is somewhat of a farce when you are now suggesting the only way to visit these shops is to walk. There are numerous elderly people who can't walk that far to collect their prescriptions, pick up a paper, visit the butcher or hardware store and even I as an able person, if I cannot shop and take the stuff easily back to my car to take home, will just travel elsewhere, again defeating the object as more miles and more pollution.

To suggest people travel by bus when there is only one bus an hour from Paddock Wood to Tonbridge and it stops at 18.05 is beyond ridiculous. Added to this is the sheer cost of public transport. A bus journey is nearly £4, do you seriously expect a family of 4 to forgoe their car at at cost of £2 for them all to travel to Tonbridge, to catch the once hourly bus and pay £16 for the privilege??

We have already lost a florist, Chinese, Indian takeaway and a hairdresser on the High Street to make way for yet more housing, we will lose all our shops if people cannot easily visit them and park nearby, maybe this is part of your plan so you can just turn the whole of Paddock Wood into a concrete housing jungle but I feel it is very sad for the village.

It is bad enough that we are having to take all these extra houses without any infrastructure in place to deal with it, that we are constantly having to put up with roadworks, traffic lights and utility problems whilst the workmen put in what is required, without then penalising us further by shutting the main routes into and out of Paddock Wood.

There are numerous country lanes available for cyclists and walkers and seen as they do not contribute towards the roads in terms of road tax, I do not see why their needs are more important. In an ideal world everyone would walk everywhere but we all lead busy lives, trying to get to work, nip to the shops etc and therefore cars are sadly required.

Please see some sense in your unfeasible and ill thought out plans as all these will do is close our lovely high street shops and cause traffic build up and pollution which is definitely not what the aim of this funding was!

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Jacqueline Hayward. Gan [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock wood Kent [REDACTED]
Consultee	Jacqueline Hayward Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Jacqueline Hayward Gant [REDACTED]
Comment ID	PSLP_1271
Response Date	04/06/21 12:43
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Jacqueline Hayward Gant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS2

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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I'm agreeable to some new housing but to start the Mascall's site and Church Road Site at the same time as Green Lane site, the Hop Pocket old pub site and lose the orchards and fields down to the old Elm Tree pub. The site of the fish and chip shop on Maidstone Road, the development on the site of the old police station, the corner detached house in Church Road are all being made into several properties. Every space with fields, orchards and the oxygen we get from the trees are being destroyed. They cut down the old oak trees on church road and hacked through the ancient hedgerows before the ecologist was present. I'm sure she was only present as several of us demanded to know why they were destroying habitats with foxes, owls, rabbits and badgers and bird life including 2 small egrets that live near the Church Lane site.

They closed Commercial Road to traffic with no consultation and placed later planters actually on the road with the two yellow lines covered potentially could cause an accident. I could not use my blue badge in the road and it isolated me in my home as well as shielding for 14 months as I am in group 4. My husband as well is in group 4.

My daughter too with medical problems which led her to have to sell her Land Rover as she sustained multiple fractures to her vertebrae.

I could not get a NHS placement in the local dentists as they had a long waiting list and were not taking new clients. The GP surgery as well finding the workload extremely busy pre any new houses being filled.

No infrastructure pre builds, no school, no extra GP practices, no fire station ready as it is a retained station and then no police station.

The train station car park is always full pre building works. The trains are full by the time they get to Paddock Wood so how will the thousands of new people in the new builds get to work on the shortened train service, also they took away the trolley service on the trains.

The building of the retirement buildings behind Barsley's has meant another car park taken away. We have already lost the Barclays Bank and the HSBC Bank in the small high street/ Commercial Road.

The bus service is extremely irregular and very expensive.

They also want to build on the Memorial Park again concreting again for a car park and leaving millions of pounds in debts payable over a huge amount of years.

Why are they placing out of borough, London borough social housing in the Green Lane site when they have approximately 1000 people on the social housing list?

The fields that are being built on had orchards which soaked up excess water after heavy rain and also flooded parts of Paddock Wood pre new builds. Now the fields and orchards are gone the water table and earth has flooded and they are building these houses on flood zones.

The idea of keeping the country green is a contradiction of cutting down everything on the green spaces and fields, approx it's possible that a paddock wood may have 3000/4000 more cars on the roads making it dangerous for children and adults with asthma, COPD, and other lung conditions causing increased harm when the country is meant to be going green. The bottle neck of the Badsall Road housing is opposite a school with over 1200 pupils all walking to school and breathing in the additional car fumes, the babies and toddlers in prams and pushchairs level to the exhaust pipes.

I moved to Paddock Wood 17 years ago for its green spaces and small primary school and later the larger school.

I'm disgusted by the lack of accountability and decision making by the current conservative councillors voting for the developments when they are meant to be working with the local community who do not want this huge amount of housing placed in Paddock Wood and not spread out over Tunbridge Wells.

Why build over 50 percent of the housing in Paddock wood and even more housing in Capel?

Then they also want to take the memorial land left to the people of Paddock Wood for exercise and fresh air and now the plan to build a new community centre with concreted car parks over the green spaces.

Why are the council agreeing to multiple sites in one small town.

Why are they not looking at the elderly and adults and children with special needs and taking away the cars from Commercial Road will mean no access for people with blue badges who can not take a hopper bus as they cannot travel on a bus when they have, like me, no bus stops near my home.

This surely is restrictive and against the Disability Discrimination Act.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Jacqueline Hayward. Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock wood Kent [REDACTED]
Consultee	Jacqueline Hayward Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Jacqueline Hayward Gant [REDACTED]
Comment ID	PSLP_1273
Response Date	04/06/21 12:52
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Jacqueline Hayward Gant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR6 2b) Low Traffic Town, possible closure of Paddock Wood Railway Bridge to vehicles as part of the Local Cycling & Walking Infrastructure Plan & partial closure of Commercial Road to traffic

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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They closed Commercial Road to traffic with no consultation and placed later planters actually on the road with the two yellow lines covered potentially could cause an accident. I could not use my blue badge in the road and it isolated me in my home as well as shielding for 14 months as I am in group 4. My husband as well is in group 4.

The idea of keeping the country green is a contradiction of cutting down everything on the green spaces and fields, approx it's possible that a Paddock Wood may have 3000/4000 more cars on the roads making it dangerous for children and adults with asthma, COPD, and other lung conditions causing increased harm when the country is meant to be going green. The bottle neck of the Badsall Road housing is opposite a school with over 1200 pupils all walking to school and breathing in the additional car fumes, the babies and toddlers in prams and pushchairs level to the exhaust pipes.

The bus service is extremely irregular and very expensive.

Why are the council not looking at the elderly and adults and children with special needs and taking away the cars from Commercial Road will mean no access for people with blue badges who cannot take a hopper bus as they cannot travel on a bus when they have, like me, no bus stops near my home.

This surely is restrictive and against the Disability Discrimination Act.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Teresa Homewood [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Teresa Homewood [REDACTED]
Comment ID	PSLP_951
Response Date	01/06/21 15:31
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Teresa Homewood
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 2 The Strategy for Paddock Wood Town Centre	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The councils proposal to shut access over the railway bridge to all vehicle apart from buses (which only come to Paddock Wood once an hour) would not deter any traffic going to Paddock Wood. It would only ensure longer journeys for anyone living in Paddock Wood as there are only two main routes in and out of Paddock Wood. The railway bridge being one of the two. It would effectively cut Paddock Wood town in half and cause considerable addition vehicle traffic along Maidstone Road for residents who need to go to Maidstone Hospital or who work outside Paddock Wood. It would send every vehicle on an additional 3 mile journey which would have extremely negative impact on the environment. Maidstone Road is used by pupils and parents walking to the primary school and pupils walking to the secondary school. By closing the railway bridge, each vehicle would instead of passing approximately 100 houses would send each vehicle on detour that passes 2 schools, 4 housing estates and the proposed new estate of approximately 3000 plus houses, causing more traffic jams and damage to the environment as well as additional pollution for the children walking to school. The council actually state that the bridge is the only access to Paddock Wood over the railway line. In addition there are two narrow lanes before the bridge, which do not have street lighting or road markings, these narrow country lines would therefore be used as a cut through if the bridge was closed, causing considerable inconvenience and pollution to the residents of these quiet lanes

In addition, there are several local villages where residents travel to Paddock Wood to shop or use the train station. Buy shutting the bridge these vehicles would either have to take 3 mile detour, causing congestion elsewhere or they wouldn't come to Paddock Wood at all and shop elsewhere, which would devastating for the local high street.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question

5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The only modification I can suggest is to not close the railway bridge.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As a resident of Paddock Wood it is necessary to have representatives at the hearing sessions who are aware of the negative impact the road closure would cause

Comment

Consultee	Angela Hurley [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Angela Hurley [REDACTED]
Comment ID	PSLP_1389
Response Date	03/06/21 19:08
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Angela Hurley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I wish to voice my strong objection to the proposal in your local plan to make Hartlake Road a no through road.

The distress and upheaval to residents of Tonbridge, Tudeley, Capel, Hadlow, Golden Green and East Peckham will be horrendous. The extra traffic on other roads especially at peak times is not acceptable. How are parents expected to get their children to school? What will be the impact on restaurants such as The Poacher and Partridge and The Bell Inn? This proposal is totally unacceptable and I urge you to reject it.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Colin Hurley [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Colin Hurley [REDACTED]
Comment ID	PSLP_1395
Response Date	03/06/21 19:21
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Colin Hurley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I wish to register my objection to this proposal. I regularly use this road. It's closure will will have a significant detrimental impact on all of the surrounding areas and local businesses. This was clearly demonstrated when the road was closed due to flooding.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Louise Jenner [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Louise Jenner [REDACTED]
Comment ID	PSLP_1417
Response Date	03/06/21 23:43
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Louise Jenner
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I'm writing to object to the closure of heartlake road within your plan.

I'm a resident of north tonbridge with one child attending a local primary school Woodlands, a toddler attending family childcare in tudeley and my work location based in East Peckham. The road closure of heartlake road (which has occurred due to road works) would make my morning commute a nightmare. This journey due to school drop off and childcare drop off already takes approximately an 1 hour 15 mins. These plans never look outside the traditional commute to work of one person traveling to one point/place of work.

With all the additional traffic pushed towards the town of Tonbridge my commute to work would take so much more additional time it would be impossible to complete my employment role before collecting my children. Many residents including myself work in local villages these roads enable us to get to work as there is such limited transportation outside of the main town.

Road traffic plans always look to push residents into walking or using public transport. However this isn't viable. The public transport outside of the town is very poor, there are limited if not no footpaths which would be extremely dangerous with multiple children.

The closure of this road would cause a huge impact to residents of local villages who use these roads for all domestic and social purposes. Local village businesses would lose passing customers/trade and possibly employees.

I wish to be kept updated on this matter.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Fiona Jones [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Fiona Jones [REDACTED]
Comment ID	PSLP_1397
Response Date	03/06/21 17:43
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Fiona Jones
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I write to confirm my objection of the proposed closure of Hartlake Road. This will have a knock on effect onto Tonbridge as outlined in TMBC's official objection. This is an ill-conceived idea that does not take anything into account other than forcing through the Capel development of which there is no support locally.

Wake up and listen to your residents and surrounding councils. You should be representing your constituents not alienating them.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Delwyn Kay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Delwyn Kay [REDACTED]
Comment ID	PSLP_1267
Response Date	04/06/21 12:52
Consultation Point	Policy STR 6 Transport and Parking (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation	Delwyn Kay
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR -6 proposed closure of Hartlake Road

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My family and I have lived in East Peckham for nearly 19 years and travel for work, school and social connection around the area.

Hartlake Road is the main route for our small village and a few surrounding hamlets into South Tonbridge and to the A21. To close this road would cause considerable inconvenience, travel, cost and pollution as we are diverted onto longer routes and thereby increasing delays for all travellers. The problem here is the proposed development of Tudley and Capel, not the needs of a few villagers to continue to use a necessary and local road to get to their nearest town. The main road route onto the A26 is fine for north Tonbridge or the high st but adds delay and congestion to our accessing south Tonbridge, where the girls schools are in particular.

Additionally it would prevent access to the Poacher restaurant and bar, this is local to East Peckham but would cease to be if Hartlake Road were to be closed. This would adversely affect their business by preventing access from one direction.

It would also affect our ease of accessing local river walks and historical sites, such as the river walks from Hartlake bridge or the famous Tudley church. It would be an effort to solve a potential problem of traffic on the road, but create more disturbance and restrictions for local residents seeking to explore their near outdoors. Preventing excessive housing developments in Tudley/East Capel would prevent excess traffic onto B2017 and traffic build upon the intersection with Hartlake Road, which is a much more sustainable and sensible solution than the proposed 'throw the baby out with the bathwater' solution of closing Hartlake Road.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Delwyn Kay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Delwyn Kay [REDACTED]
Comment ID	PSLP_1252
Response Date	04/06/21 12:24
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Delwyn Kay
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR 6, proposed closure of the B2160 at the railway bridge.	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My family and I have lived in East Peckham for nearly 19 years. We travel to Paddock Wood using this route each week to go to the supermarket, access our GP or to the vet for our ailing cat and when our daughter worked at Waitrose we travelled this route at antisocial hours several times a week.

The proposal to close the road would adversely affect East Peckham villagers from accessing their most local facilities for their GP surgery, vet, secondary school, supermarket and main street shops. It would funnel our local trips onto the B2017, in with all traffic heading to Colts Hill/Tunbridge Wells and Five Oak Green/A21 and Tonbridge and add 100% to travel time and distances. This only adds to congestion, pollution, travel costs and inconvenience for all travellers. It would adversely affect Paddock Wood shops as sales diverts to online or locals travel to other areas that are less inconvenient and offer more shops.

This proposal blocks local residents on the Hop Farm side of the bridge from accessing their own town and facilities without an excessvie diversion onto the B2017 or down small local lanes, meaning if they had mobility problems or needed to carry items such as supermarket shopping they would be unable to without excess car travel. The hourly 6/6A bus would not solve this problem as it does not serve the GP or Commercial St. It is likely that East Peckham residents would also resort to using small rural lanes as alternatives and thus this plan creates more problems than it solves.

With all the new development on the B2017 and around Church Rd it would be madness to turn those 2 roads into the main routes to access Paddock Wood, they are not able to handle that volume of traffic. The secondary school at the junction of the new houses and with the proposed development required at the school would only add to this congestion, queueing and pollution.

Additional plans to close Commercial Road to through traffic, in conjunction to the road closure proposal at the railway bridge, would make it quicker to go to a supermarket in Tonbridge than access Waitrose in Paddock Wood. How would their trucks access the store? What even is the route from East Peckham to Waitrose with these closures? B2017 past Putlands Gym and down Green Lane with its narrow road and speed reduction measures? Down small lanes to Queens St and Church Road? Down Lucks Lane and into Queens Street? Or funnel all the traffic, including the trucks, into Station Road that is single lane at points. It is clearly a nonsense proposal without understanding of how local traffic needs to access the area from the direction of East Peckham and overestimates the ability of people to carry out their business as a pedestrian. As a cyclist on the roads several times a week I can tell you now that this is not a possible way of completing my family weekly food shop!

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicola Kearns [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Nicola Kearns [REDACTED]
Comment ID	PSLP_1430
Response Date	04/06/21 16:50
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Nicola Kearns
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am writing to oppose your hidden scheme of trying to close Hart Lake.

I am sure many of you do not actually live in this area, however this is a well used road by the rural residents to enable them to get around the countryside. by closing this road as part of the local plan you are forcing us to use already heavily congested insufficient road schemes. by removing the use of HartLake you will be causing more pollution due to more traffic to be standing still because of the sheer weight.

TWBC appears to be very underhanded and not transparent with the information and is pushing all their issues on to Tonbridge. By closing this stretch of road you are clearly onside with Harry Teacher and what ever we say is not being taken into consideration.

Closing HartLake only will benefit one person and the local Plan!

You have increased the size of Paddock Wood tenfold and creeping into five oak green, you have not taken any responsibility in creating new roads or have proposed new schemes to enable the people who already live here and the people buying up the new housing stock that is currently being built.

if this is your answer to the issue by closing a road and also closing the bridge into paddock wood you are making everyones lives a further misery.

it is evident NONE of you live around here and your solution is childish and futile.

This idiocy MUST be STOPPED

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_156

Comment

Consultee	Strategic Planning ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) (Strategic Planning - [REDACTED])
Comment ID	PSLP_2195
Response Date	04/06/21 16:56
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Kent County Council-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP_2164), Section 2 (PSLP_2168), Section 3 (PSLP_2169), Policies STR1 (PSLP_2170), STR2 (PSLP_2171), STR4 (PSLP_2172), STR5 (PSLP_2174), STR7 (PSLP_2175), STR8 (PSLP_2176), Section 5 (PSLP_2177), Section 5: Royal Tunbridge Wells (PSLP_2178), Policies AL/RTW1 (PSLP_2180), AL/RTW5 (PSLP_2181), AL/RTW7 (PSLP_2183), AL/RTW14 (PSLP_2184), AL/RTW17 (PSLP_2185), AL/RTW21 (PSLP_2187), STR/SO1 (PSLP_2188), AL/SO1 (PSLP_2190), Strategic Sites (PSLP_2192), STR/SS1 (PSLP_2193), STR/SS2 (PSLP_2195), STR/SS3 (PSLP_2196), STR/PW1 (PSLP_2199), AL/PW1 (PSLP_2200), STR/CA1 (PSLP_2201), AL/CRS1 (PSLP_2202), AL/CRS2 (PSLP_2203), AL/CRS3 (PSLP_2204), AL/CRS4 (PSLP_2205), AL/CRS6 (PSLP_2206), AL/CRS7 (PSLP_2207), STR/HA1 (PSLP_2208), PSTR/BE1 (PSLP_2209), PSTR/BI 1 (PSLP_2210), PSTR/BM1 (PSLP_2211), PSTR/FR1 (PSLP_2212), PSTR/GO1 (PSLP_2213), PSTR/HO1 (PSLP_2214), AL/HO1 (PSLP_2215), PSTR/LA1 (PSLP_2216), AL/LA1 (PSLP_2217), PSTR/PE1 (PSLP_2218), AL/PE4 (PSLP_2219), PSTR/RU1 (PSLP_2220), PSTR/SA1 (PSLP_2221), AL/SA1 (PSLP_2222), PSTR/SP1 (PSLP_2223), EN1 (PSLP_2224), EN3 (PSLP_2225), EN4 (PSLP_2226), EN5 (PSLP_2227), EN8 (PSLP_2228), EN9 (PSLP_2229), EN10 (PSLP_2230), EN12 (PSLP_2231), EN13 (PSLP_2232), EN14 (PSLP_2233), EN18 (PSLP_2234), EN19 (PSLP_2235), EN20 (PSLP_2236), EN25 (PSLP_2237), EN26 (PSLP_2238), H1 (PSLP_2239), H3 (PSLP_2240), H7 (PSLP_2241), ED1 (PSLP_2242), ED2 (PSLP_2243), ED3 (PSLP_2244), ED4 (PSLP_2245), ED5 (PSLP_2246), ED6 (PSLP_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP_2248), Policies TP1 (PSLP_2249), TP2 (PSLP_2250), TP3 (PSLP_2251), TP4 (PSLP_2252), TP5 (PSLP_2253), TP6 (PSLP_2254), OSSR1 (PSLP_2255), Appendix 4 (PSLP_2256) and Evidence Base (whole Plan) (PSLP_2257)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Public Rights of Way

The County Council supports the references made to pedestrian and cycle environments but would draw attention to the need for connectivity between the network to local facilities and safe use of these sustainable transport opportunities.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lisa Landreau [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lisa Landreau [REDACTED]
Comment ID	PSLP_1324
Response Date	04/06/21 16:54
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Lisa Landreau
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR SS1 Paddock Wood	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

S4 Reference – Strategic.47, 4.50. Planning and Infrastructure Paper – Paddock Wood transport infrastructure. Sections 4.14, 4.24, 4.42, 4.43, 4.

Closing the Paddock Wood Maistone Road Railway bridge to incoming traffic will cause untold increase of emissions and is not a viable solution to the calming of traffic in the town. The plan has not taken into account the additional 1000 new houses (an average house now owns 2 cars) and the toll it will take on the environment. As the plan indicates, 80% of the traffic leaves PW and the traffic jams at Badsell road and Whetstead Road at peak times are long. As the majority of Paddock Wood live the Waitrose side, the Southbound train journey commuters who utilise the car park will drive an increased mileage of 4.6 miles to park. This is unrealistic and causes increased CO2. Residents who lives on the other side of the bridge will have to take this journey every time they need to get into Paddock Wood - it does not make any type of common sense.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure this plan is to the benefit of the town why not make Commercial road a one way system, the car park entrance at Church road and the other in Old Kent road negating the need for through traffic. The bridge must stay open to all traffic - 99% of the town is built south of the bridge so this would not negate traffic.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- ☐ No, I do not wish to participate in examination hearing session(s)
- ☐ Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- ☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicola Leeds ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Nicola Leeds ([REDACTED])
Comment ID	PSLP_2327
Response Date	04/06/21 16:53
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Nicola Leeds
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 Strategy for Tudeley Village

LCWIP Local Cycling and Walking Infrastructure Plan (p48)

[TWBC: this representation was set against the whole Plan but has been duplicated by TWBC at Policies STR/SS1, STR/SS2 and STR/SS3 for ease of reference - see PSLP_1310, PSLP_2326, PSLP_2327 and PSLP_2828 respectively]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
----------------------	------------

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Paddock Wood for 15 years, and have seen the expansion of the town even within that time. Despite promises, the infrastructure has never been delivered to address the issues created by the increase in housing. There has been increased flooding across the town, with more frequency, with some residents suffering from foul water in their homes caused by inadequate sewage systems having to cope with yet more residents. There has been a lack of investment by TWBC in Paddock Wood, no expansion of medical services, no improvement in the shopping facilities in the town, or in the leisure centre which is now run down. In fact, the opposite has been true. TWBC has consistently approved planning for developments that detract from Paddock Wood and add more problems without delivering on any of the investment that is critical. We have been promised time and again that there would be no further development without the infrastructure in place in advance. There is little or no regard on the impact of continued overdevelopment on the very nature of Paddock Wood and surrounding villages; no consideration of the increased flood risk to existing residents from the developments already approved, let alone those in the pipe line. And absolutely no consideration of the residents.

There is also a need to reassess the total requirement for housing going forward - the Government's "levelling up agenda" shows that increased housing will be needed in the north of England rather than in the SE corner - these changes in national approach have not been followed through into the local plan. TWBC have not sufficiently considered the future housing need of the borough to ensure that the number of dwellings being planned for is correct.

As part of the previous consultation on the local plan, TWBC included as part of its justification for building in Capel and Paddock Wood that the land owner had decided to sell the land, and that dealing with one land owner rather than several would be easier. This is possibly the worst, most egregious reason for building on one location that has ever been heard.

The local plan is not positively prepared, effective nor justified for a number of critical reasons.

Firstly, on the requirement for the plan to be positively prepared and effective. TWBC have not amended their plan to account for the changed circumstances brought about by the COVID 19 pandemic. The pandemic has shown that commuting and working patterns have changed and will continue to remain different to that expected pre-COVID - the local plan has not been reviewed to ensure it is fit for purpose going forward.

The vast majority of housing has been proposed to be placed at the tip of the borough - this site is entirely unsuitable for providing housing of increased job opportunities for the rest of the borough,

which stretches far to the east and south, whilst at the same time "lumping" the housing in one small area. The realities of travel across the borough means that this housing will not be suitable for those who live and are employed in, for example Cranbrook. Therefore, despite the stated aim of the plan to provide affordable housing and employment to the residents of the borough it will do the opposite. The proposal will result in people moving to the borough from outside it, ensuring that locals are unable to take advantage of the increase in housing, and inflating prices to the point that no one who works locally will be able to live here.

Much of the infrastructure included within the local plan will not be for TWBC to provide - and the rest will be dependent on "contributions" from developers. There is a very real risk that these will never materialise.

At the recent vote by councillors on whether to move to Reg 19 consultation, several of the papers were not made available, and worse, it was clearly stated in the meeting that some councillors had not even bothered to review the papers in advance of the vote. This is a clear abdication of responsibility, and undermining of due process.

Therefore the plan is not effective.

In relation to whether the plan is justified - the response to regulation 18 consultation was woefully inadequate - despite a large number of responses expressing serious concerns with the local plan (97% opposed the plan), these were not taken into account, with TWBC ploughing on with their proposal regardless of the views of the residents who would be affected by it. This makes a mockery of the consultation process required under national law. The only changes made were to exacerbate the issue by putting more houses into the plan for Capel and Paddock Wood.

The local plan also proposes to build on land that is at risk of flooding, while taking away agricultural land and green spaces. These are all in contravention of the stated aim of the plan.

The plan itself states that green belt is to prevent urban sprawl and should be protected - yet TWBC are proposing to remove 5% of green belt land in Capel parish to build the extension to Paddock Wood, and the Tudely Village. These are entirely unjustified removals of green belt land, and would in effect create a long corridor of development between Paddock Wood and Tonbridge. Green belt is meant as a protection - it should not be removed from such protection without significantly stronger justification. There are alternative sites which would not require the use of green belt land such as Castle Hill.

Flooding is a very real issue already in Paddock Wood and Five Oak Green. Flooding incidents are increasing, with the greatest threats coming from surface water flooding. The sites at Capel and Paddock Wood proposed for development are all prone to flooding, and play a key role in ensuring that existing developments are not affected more severely. This winter, the ground was saturated for weeks in the areas the plan expects to build. In Tudely, the water runs down the road like a river, and that is without the additional building in place. The proposal would remove trees and other vegetation that use the water; they would concrete over the very land with acts as a sponge. The mitigation that is proposed is insufficient to respond to this increased, and increasing risk. Combined with the proposal to create new roads to service these new developments, the issue just gets worse and worse. This is also against national policy which states that flood plans should not be built on where alternatives exist. Alternatives exist within Tunbridge Wells borough. Where mitigation plans are put in place, they will only exacerbate the impact on communities up and down river - places which already struggle with flooding - Tonbridge, East Peckham, Yalding to name just a few.

The plan also proposes to dig up more and more countryside to build additional roads to deal with the increased traffic - on yet more green belt and countryside. This area risks being covered in concrete, with the increase in air pollution, risk of flooding, reduction in green space and biodiversity the only likely outcomes.

The proposal made under the LCWIP Local Cycling and Walking Infrastructure Plan to block access to vehicles over the railway bridge will completely cut off half of Paddock Wood from the town centre - forcing all vehicles to use the A228, or country lanes. There is no consideration to the impact of having thousands of extra cars needed to make that journey, no consideration of the real world impact on the residents of Paddock Wood. What if there is an accident on the main road that closes it? What if an ambulance or fire engine is needed? What about residents who are less mobile? This plan will have the opposite effect to that stated. This has to be one of the most poorly thought through and ludicrous ideas within the local plan. Wishing that fewer people drove cars doesn't make it so. Taking other steps

- effective enforcement of parking on Commercial Road, creating a lively retail area rather than permitting more and more flats to be built in place of retail units will be much more likely to.

This plan goes against national policy - there is no provision for addressing the biodiversity crisis, no substantive plans to mitigate against the impacts of climate change with the expected increase in flooding. There is no recognition of the importance of green space for residents of Paddock Wood. There is no substantive plan for ensuring biodiversity net gain across the plan.

The only part of this plan I can support is the provision of a swimming pool - and yet, even with all the housing planned, it's still only potential in the plan. There is no assurance that ANY of the "benefits" put forward will be realised.

Paddock Wood has already absorbed 1000+ housing units, the intention to build yet another 6000+ dwelling within the space of 5 miles is utterly without consideration of the current character of the area, or its residents. Paddock Wood will grow in area by 200%, Tudely will expand by 500%. This is completely disproportionate. Local residents are being ignored.

It is also clear from the representations from Tonbridge and Malling Borough Council (TMBC), and its many residents that the duty to cooperate has been entirely disregarded by TWBC. The impacts of the exponential growth in housing proposed under this local plan will be felt by neighbouring local authorities as the services and infrastructure required by such a significant increase in housing and population will predominantly be felt by TMBC and Maidstone BC rather than by TWBC, but will not receive any revenue from council tax etc. the increase in traffic alone will have a significant impact on the residents of TMBC, there will be an increase in the number of people expecting to attend Tonbridge schools, and use leisure facilities in Tonbridge. TWBC's intention to put the vast majority of its intended housing growth right on the border with 2 other local authorities shows a blatant disregard for the knock on impact on those boroughs.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

TWBC need to LISTEN to its residents and neighbouring local authorities. There needs to be a fundamental reassessment of where additional housing is needed in the borough and not take the easy approach of putting the vast majority of housing into one small area of the borough which won't support other residents and unfairly results in 15 years of disruption for a small proportion of the borough's residents. This will help address the effectiveness of the plan.

Alternative sites need to be considered - and some have already been offered up by developers. There has been inadequate consideration of brownfield and alternative sites, with simple dismissal of such ideas in response to proposals offered under previous consultations. These sites should be where they are not on flood plains, not on good agricultural land that will be lost forever, and not where the impacts of the developments will be felt almost entirely by a small proportion of residents and by those residents of neighbouring local authorities who will not benefit from any additional funding.

In addition, options 7 and 8 as set out in the Sustainability Appraisal should be further considered to more fairly distribute housing need across the borough.

Should development continue in Paddock Wood and Tudely Village, it must be a requirement that the additional services and infrastructure the plan suggests "may" follow need to be in place first. There

needs to be a complete rethink of the LCWIP Local Cycling and Walking Infrastructure Plan so that the road bridge in Paddock Wood is not closed.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

the assessment of impact on the sustainability objectives in table 15 of the SA are not accurate - the benefits are overplayed - they would not be felt across the borough, the developments will not provide social mobility and inclusion as suggested, and the negative impacts on air, biodiversity, climate change, health, noise, travel and water are all under recognised.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Deborah Luckhurst [REDACTED]
Email Address	[REDACTED]
Address	- Paddock Wood -
Event Name	Pre-Submission Local Plan
Comment by	Deborah Luckhurst [REDACTED]
Comment ID	PSLP_630
Response Date	27/05/21 15:53
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Deborah Luckhurst
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I would like to object to the closer of the railway bridge to be closed and used for just bikes and buses. I'm unsure if you live in paddock wood and if you did you would realise that the ambulance station is the other side of the Bridge in eldon way. So if some needed an ambulance in Maidstone Road that means they would have to go past the garden centre turn left at the hop farm roundabout go alone wetstead Road to the other roundabout turn left along badsell Road come to the mascells traffic lights and turn left to get to Maidstone Road this taking 10 15 mins on the road if traffic was good. Which it won't be because people that live the other side of the bridge the industrial estate side of paddock wood. Would have to go all around the above roads to get home or all the people that live the other side of the town would have to go alone church road and up to green lane all having new houses built so more cars and more traffic. The said trip for an ambulance would normally take 2 to 3 mins but I feel you are putting people at risk. This will also cause a lot of trouble for people getting to work that live one end of the town and need to get out of town. The town has been built up over the years and more cars are on the road and you are wanting to close one of the main roads in the town. You really don't have a clue about what the people that live here want or need. We need more shops, Dr's, schools not more houses and roads being closes. Come to the town and ask people if they want a road closed. As for buses only to use the road that is the biggest joke the buses run one an hour.

I strongly object to this plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Richard Mewett [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Richard Mewett [REDACTED]
Comment ID	PSLP_1433
Response Date	03/06/21 18:17
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Richard Mewett
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

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Question 5

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It has recently been highlighted that TWBC are proposing to permanently close Hartlake Rd due to the Capel development. I wish to strongly object to such a ridiculous proposal. To close this road will cause untold problems for residents living on the TMBC side of Hartlake, increasing both traffic congestion and length of journeys. Hartlake is the main route for thousands in the villages of East Peckham, Hadlow and Golden Green. It will also create massive problems on the A26 Hadlow Rd. The entire development of Capel is strongly objected to and will cause increased flooding problems for thousands living downhill from it. The complete disregard and contempt by planning officers of TWBC in these matters for residents within TMBC has been abhorrent from the start.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Andrew Milligan [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Andrew Milligan [REDACTED]
Comment ID	PSLP_875
Response Date	21/05/21 21:27
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Andrew Milligan
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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As a resident of 40+ years in east Peckham the proposal to turn the paddock wood rail bridge to bus access only is beyond ridiculous.

This route is used by east Peckham residents to access paddock wood for rail, shops, friends houses, services including the health centre and vets

A through route to the matfield, and then the surrounding villages including brenchley

But also for access to a21 and beyond

The idea to close the bridge to everything except buses is to be frank absolutely ridiculous.... please try and access try and access the services named above but go the route you have suggested but take in mind the extra traffic due to the houses that are being built..

Reality is paddock wood will lose out and business will not be supported and this would be a shame

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Richard Oldfield [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Yalding [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Oldfield [REDACTED]
Comment ID	PSLP_1028
Response Date	02/06/21 21:58
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Richard Oldfield
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I read with stunned amazement of the proposal to close the Paddock Wood railway bridge to traffic, it is the dumbest proposal I have hear of in many years. The inconvenience, cost and damage to local people and their businesses would be significant and the benefit at best an illusion.

I suggest if this proposal is not binned immediately it is put to a local referendum, the verdict is not in my mind open to doubt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_78a-c

Comment

Agent	Mr Troy Hayes [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Troy Planning & Design
Address	[REDACTED] [REDACTED] London [REDACTED]
Consultee	Mrs Nichola Reay [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Paddock Wood Town Council
Address	The Podmore Building St Andrews Recreation Ground TONBRIDGE TN12 6HT
Event Name	Pre-Submission Local Plan
Comment by	Paddock Wood Town Council [REDACTED] [REDACTED]
Comment ID	PSLP_1455
Response Date	04/06/21 16:11
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1448-1479(not inclusive)_Troy Planning for PWTC_SI-3_PW TC Response to Reg. 18.pdf PSLP_1448-1479(not inclusive)_Troy Planning for PWTC_SI-2_Representation.pdf PSLP_1448-1479(not inclusive)_Troy Planning for PWTC_SI-1_Cover Letter_Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paddock Wood Town Council

Question 2

Agent's Name and Organisation (if applicable) Troy Planning & Design

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

[TWBC: for other comments by Paddock Wood Town Council, please see Comment Numbers PSLP_1448-1456, PSLP_1461, PSLP_1471, PSLP_1474, PSLP_1475-1477 and PSLP_1479]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Tunbridge Wells Pre-Submission Local Plan – Paddock Wood Town Council Representation

Please find enclosed our representations to the Council's Pre-Submission Local Plan. These Representations are prepared and submitted on behalf of Paddock Wood Town Council (PWTC) and the representations are supported by the Paddock Wood Neighbourhood Plan Steering Group.

We also enclose the Council's Representation Form with our signature confirming that we do wish to take part in the Local Plan Examination Hearings.

We would like to point out that the majority of PWTC's representations to the Regulation 18 consultation were not addressed by TWBC. Given that the Local Plan has changed very little between that earlier consultation and the current period of representations on the Regulation 19 Local Plan we enclose these earlier representations and request that TWBC takes these into account and ensures they are supplied to the Secretary of State if the Council decides to proceed to submission stage.

We request that you please include this letter as part of our formal representations.

Our representations conclude that the Local Plan and its evidence base fail all the tests of soundness set out in the National Planning Policy Framework (NPPF) and that the Local Plan is not legally compliant.

Our representations go to the heart of the soundness and legality of the Local Plan, its policies, and the process TWBC has undertaken in preparing its Local Plan. We therefore consider that the entirety of the Local Plan is unsound as it is not legally compliant. Whilst we have singled out a number of specific policies that we consider to be unsound it would simply not be possible to comment on every single policy in the Local Plan which is a 515-page document.

We trust that TWBC appreciates the importance of the Local Plan proposals to the Paddock Wood community in terms of the inappropriateness of the proposals which would, if the Local Plan in its current form were to be implemented, have irreversible negative impacts on Paddock Wood and the wider area.

We urge TWBC to reconsider its development strategy which is set to fail at Local Plan Examination in Public and to restart the Local Plan process using an evidence base led approach which would conclude that Paddock Wood is an unsuitable and unsustainable location for strategic housing growth. Such an approach would save TWBC, the taxpayers and all the stakeholders involved in the Local Plan process an enormous amount of time and resources debating a Local Plan which is clearly unsound and not legally compliant.

Town Centre

14.11. Policy STR/SS 2 of the draft Local Plan presents the strategy for Paddock Wood Town Centre.

14.12. Supporting text to this policy quite rightly states that with the scale of planned growth proposed around Paddock Wood, there is an opportunity to invest in and enhance the role of the town centre.

14.13. Both the policy and supporting text state that a Supplementary Planning Document will be prepared for the town centre.

14.14. This is despite efforts by Paddock Wood Town Council to prepare a Neighbourhood Plan, progress of which has been stalled by TWBC, and within which the future of the town centre is a key area of focus.

14.15. Paddock Wood commenced work on the production of a Neighbourhood Plan in 2015. A Regulation 14 draft was prepared in 2018, although this was not subject to consultation as publication of the emerging Local Plan introduced proposals for significantly more growth around Paddock Wood than originally envisaged.

14.16. Work on the Neighbourhood Plan was paused to enable review and consideration of the Local Plan, and how the Neighbourhood Plan should respond, such that it conforms to the emerging strategic objectives and policies of the Local Plan.

14.17. Work on the Neighbourhood Plan has since recommenced but has been delayed once again in the absence of more detailed information from TWBC on their proposal for and evidence to support change in the town centre.

14.18. The information prepared by TWBC to date in support of the town centre policies in the Local Plan remains limited and by delaying publication of this further to production of a future SPD the Council is frustrating the Neighbourhood Plan process. Indeed, TWBC will be aware that, once made, a Neighbourhood Plan will form part of the development plan and carry more weight than a SPD. TWBC should thus be supporting the Neighbourhood Plan process.

14.19. Policy STR/SS 2 lacks detail and supporting evidence and should link to the NDP to provide that information. The Paddock Wood Economic Opportunities Report (SQW, December 2020) prepared as part of the Strategic Sites Masterplanning Report does not specifically comment on the town centre, beyond referring to other evidence base documents prepared in support of the Local Plan. It does

though note that given existing policies in the adopted 2016 Local Plan as well as those preceding that in the 2006 Local Plan, that there has been a *'long standing aspiration for a comprehensive and masterplanned approach to the development of the town centre'* but this has not materialised (see para 4.12 of SQW report). The draft Local Plan does little to address this, delaying this process to a SPD which has yet to be forthcoming.

14.20. The TW Retail, Commercial, Leisure & Town Centre Uses Study Update (Nexus for TWBC, Feb 2021) is primarily focused on Tunbridge Wells town centre. In respect of Paddock Wood, it notes that the vacancy rate has increased significantly between the 2016 Town Centre study and the 2021 update. However, this can be attributed to land in the control of Churchill Homes which has been granted planning permission and where shop front retail use will be replaced as part of that scheme. The study identified a number of issues for Paddock Wood town centre but does not expand upon this to provide recommendations as to actions or interventions that should take place (beyond establishing a quantum of new retail floorspace that it suggests could be accommodated in the town centre or within a neighbourhood centre as part of the growth of the town).

In summary:

14.21. The draft town centre policy is limited in its effectiveness. It does not set out a clear strategy. There is limited information to support proposed changes to the town centre. This is instead deferred to production of a SPD. This has delayed and frustrated work on the NDP, within which the improvements to the town centre are key to the future of the town. The Local Plan should recognise the role of the NDP and the weight this will have.

Access and Movement

14.22. Policy STR 6 (Transport and Parking) of the draft Local Plan notes that, for Paddock Wood, the development and delivery of strategic sites will have integrated active travel within their layout and design. This is welcome and supported.

14.23. The Town Council notes that a Local Cycling and Walking Infrastructure Plan (LCWIP) has been prepared as evidence to the Local Plan (PJA, Phase 2 report, March 2021). This recommends *'reducing through traffic access in Paddock Wood'*, which, it says, *'would help significantly with improving conditions for walking and cycling'*.

14.24. The report includes a number of suggestions to existing routes and junctions in paddock Wood which are supported by the Town Council. A set of additional measures are also set out. It is noted that these are *'ambitious'* and would produce *'transformational changes'* (see section 4.12 of report).

14.25. These complementary measures include the suggestion that Paddock Wood should become a 'low traffic town', involving closure of the Maidstone Road railway bridge to all vehicular traffic except buses. As the report notes, this is the only vehicular bridge across the railway line in Paddock Wood.

14.26. Although the masterplan for the growth area proposes new bridges across the railway, these are primarily for walking and cycling, and are not in the town centre.

14.27. Whilst the Town Council welcomes ideas and solutions to improve walking and cycling conditions, this needs to be balanced with the needs of all and restricting vehicular traffic from using the Maidstone railway bridge would have wider impacts, including on emergency vehicles, the mobility impaired, services and deliveries. It is also important to recognise that the railway line is a barrier to movement and by restricting access across this could increase severance between communities.

In Summary:

14.28. The Town Council supports measures that improve walking and cycling conditions across Paddock Wood. Policy STR/SS1 and Policy STR/SS2 of the draft Local Plan note the need to improve connections across the railway line. IN particular, Policy STR/SS 2 (5) notes the need for 'additional and improved linkages across the railway line for vehicles, pedestrians and cyclists'. This is supported. The policies do not include reference to the closure of the Maidstone Road railway bridge to vehicular traffic as suggested in the LCWIP. The exclusion of this from policy is supported. Inclusion of such a policy clause would be objected as being unjustified.

[TWBC: for full representation, please see supporting documents]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Paddock Wood Town Council confirms that it wishes to participate in the Local Plan Examination hearing sessions. Given the scale of strategic development proposed at Paddock Wood and nearby at the proposed new settlement, its extensive representations, and its role as a statutory consultee, PWTC considers it critical that it has the opportunity to provide further input into the Local Plan Examination process including the hearing sessions to respond to other evidence and arguments put forward.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-1 Cover Letter Redacted.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-2 Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-3 PW TC Response to Reg. 18.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Richard Perry [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Richard Perry [REDACTED]
Comment ID	PSLP_740
Response Date	29/05/21 19:23
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Richard Perry
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Dear Sir/Madam,I am having to email my objection to further developments around Paddock Wood area as I am not computer trained and have wasted a lot of time trying to understand what to click on etc and going round in circles as I grew up in the pre computer era so have never had any training ,this is about my limit.

I would like to object for several reasons one being most of the new houses are being built on floodplain with obvious results in the future in wetter times it has already happened in Badsell Road,and raw sewage floods gardens in Dimock Close / Ballards Way all this is only going to make it worse .

The green belt is being cut up and built on when it is supposed to be protected as Tunbridge wells claims to be green ?? Yet Hundreds of trees have been felled including many ancient Oaks,not to mention the loss of A grade farmland and Orchards.

There is not the local infrastructure in place the local doctors is over subscribed as are the dentist and nothing has been built first to allay this ,there is talk of shutting the rail bridge over the railway which is hardly a green idea as people will drive an extra 3 miles each way to get around .

None of the local roads are designed for all the extra traffic ,each house built will have at least 2 cars each, times that by the number of houses proposed it will be gridlock and extra pollution.

I would be grateful if this objection can be added I know I am not the only one who does not do computers

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Paul Revell [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Paul Revell [REDACTED]
Comment ID	PSLP_636
Response Date	28/05/21 09:11
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Paul Revell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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with references being made to close the railway bridge access on maidstone road paddock wood to traffic except buses could you please register my objection to this proposal. paddock wood has suffered enough lately and this scheme will most likely kill the remaining high street. the road very rarely causes traffic problems but re routing traffic certainly would especially with the 300 odd houses being built on one of the expected diversion road !

this scheme would most likely cause outlying villages to use unsuitable back lanes or completely annexe paddock wood shops and services off from the high numbers of people who currently use them.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Mr Gary Richards ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Tax Assist Accountants
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tax Assist Accountants (Mr Gary Richards - [REDACTED])
Comment ID	PSLP_2146
Response Date	03/06/21 12:00
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Letter
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Gary Richards, Tax Assist Accountants
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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PADDOCK WOOD

OBJECTION TO ROAD CLOSURES - Bridge over the Railway Line.

I am writing because I have tried and failed to lodge a comment or objection in the official manner on the TWBC portal. You might ponder on the future of local involvement if you make it impossible for a comment to be heard. I have a degree and several professional qualifications and deal with HMRC filings every day - yet still I failed.

I wish to register the view of a business owner in Paddock Wood.

The local plan is specifically aimed at making Paddock Wood a low traffic town. Clearly any successful business will wish to put down roots in a high traffic environment. Taking actions to discourage business in satellite towns in the borough will merely push demand to the parking nightmare towns of Tonbridge, West Malling and Tunbridge Wells.

The plan regards Paddock Wood as a self-contained sleepy hamlet rather than as a commercial catchment for the surrounding ten-mile radius. The commercial catchment of specialist stores such as Barsleys, the jewellers, florists, butchers, professional services and food outlets extend far beyond the local residents.

The commercial catchment is more than walking or cycling distances. The report's authors are clearly townies who are unused to the distances that rural living imposes.

Cutting the railway bridge adds several miles to every journey into the town and station from the north of Paddock Wood. At its most ridiculous a person working in the Henley Road within 200m of Waitrose will have a five-mile round trip to get there for shopping.

Making a pedestrian precinct out of the last 100m of the Commercial Road only adds to the misery of getting to the Paddock Wood businesses from East Peckham, Yalding or the new town of Capel, as well as adding miles from the south-Goudhurst, Matfield, Horsmonden and Brenchley.

Similarly traffic heading from South and East of Paddock Wood will have a long detour (avoiding the town) to head in the direction of West Malling. This is a commute I make often, and the closure will add time and CO2 without any benefit to Paddock Wood whatsoever.

Paddock Wood should be encouraged to grow as an alternative commercial centre to Royal Tunbridge Wells. It has excellent rail connections, a five-mile catchment devoid of other shops and room to expand.

The elements of the local plan that focus on killing vehicle traffic into Paddock Wood, will eventually kill the town, and should be reconsidered.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_117

Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1887
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	C Richards - Appendix D Climate Change Flood Zone 3a map.JPG
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel
Policy STR/SS2 The Strategy for Paddock Wood Town Centre
Policy STR/PW1 The Strategy for Paddock Wood
Policy STR/CA1 The Strategy for Capel Parish

[TWBC: this representation has been input against Policies STR/SS1, STR/SS2, STR/PW1 and STR/CA1– see Comment Numbers PSLP_1878, PSLP_1887, PSLP_1888 and PSLP_1889]

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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5.153 TWBC's Local plan for Paddock Wood including Capel is for a **significant** expansion along with Tudeley – which I have commented on earlier. 5.157 to 5.162. describe the 418 hectares STR/SS1 is to be built on.

5.163 States, ' Fluvial flood risk is a considerable factor affecting the western side of Paddock Wood and the Town Centre-.Flood zones 3 an flood Zone 2

5.164 States, the area to the north is Flood Zone 2 and 3 from the upper Medway flood plain.

5.165 States that groundwater levels are high I the northern western parts due to the proximity of the Upper Medway Flood Plain.

5..231 Paddock Wood is located on relatively flat land, associated wit the broad valley of the River Medway and the soil is impermeable Wealden clay.

In Paddock Wood Stage 1 SWMP (2011) and Stage 2 SWMP (2015) Paddock Wood is an area that has experienced a number of incidents of surface water flooding associated with small watercourses, sewerage and private drainage systems. It was recommended within the Tunbridge Wells Borough Council Level 2 SFRA (2009)that Paddock Wood be designated as an 'area of critical drainage'.

In recent years 100 homes have been built around Mascalls Farms and Court Farm. There have been problems with the new developments with Flooding and sewage. This area is not covered by mains drains. I have heard hearsay many times about the flooding and sewage problems at Paddock Wood and also the fact that houses are not selling.

STR/5 states that TWBC fully consulted Southern water regarding the supply of fresh water and the removal of foul, yet Greg Clark MP for Tunbridge Wells was advised on record, 'Plans to upgrade the

sewage network in Paddock Wood, despite repeated discussions with Paddock Wood Town Council – have come to nothing . (HoC 28/10/19)

This just demonstrates to me the ineffectiveness of infrastructure planning – if the basic needs of water and sewage cannot be sorted out quickly NOW – what does this say for the future? TWBC are proposing to build 4000 homes in this area. More homes will mean more problems. This failure to effectively sort out these issues brings into question the effectiveness of the proposed infrastructure.

It is also worth noting that TWBC are relying very heavily on Development contributions -which are incorporated into the house price. This is not going to provide affordable housing, where large amounts of money will be needed to be spent by the developer trying to mitigate the huge flood issues at Paddock Wood and Five Oak Green. If they do get built and sold- one bad flood, which is inevitable, and homeowners will be left with homes they cannot sell or insure. This is totally and utterly immoral- to build houses in a flood zone area 2 and 3 and cause so much distress to the homeowners. It is unsound, unjustifiable and should be illegal. This is not an effective planning policy and has been poorly prepared. They do not even take their own advice:- The TWBC Development Constraints Study states on p 9- 2.19 Flood zone 3 should be a significant constraint' and all the sites at Tudeley/Five Oak Green/ Paddock Wood have a % of Zone 3 areas. (Table 3-1 of Site summary assessment) p91-108

The report Commissioned by TWBC p111 (T.Wells Level1/2 SFRA)- even that recommends :14.6.2 Future Developments Development must seek opportunities to reduce overall levels of flood risk at the site, for example by:

- Reducing volume and rate of surface water runoff based on Local Plan policy and LLFA Guidance
- Locating development to areas with lower flood risk
- Creating space for flooding.
- Integrating green infrastructure into mitigation measures for surface water runoff from potential development and consider using Flood Zones 2 and 3 as public open space.

Maybe TWBC should listen to the advice they paid for?

The JBA report 2016s4793 - Tunbridge Wells Level 1 & Level 2 combined SFRA (v4 July 2019) suggested: under summary p161

- Floodplain restoration or augmentation represents the most sustainable form of strategic flood risk solution by allowing watercourses to return to a more naturalised state. This may involve measures such as

* return existing and future brownfield sites that are adjacent to watercourses back to floodplain, rather than allowing new development . This is the most sensible thing I have read in connection with Paddock Wood.

TWBC believe they can build on these sites and provide 'betterment 'at these sites-like the homes will only flood to 100mm not 500mm? TWBC are willing to spend £12 Million of public and developer funding to do so.

NPPF 155 states that , 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime(this is deemed to be 100 years-026 Ref ID:7-026-20140306) without increasing flood risk elsewhere. This development is unsound -See Appendix D NPPF 156.states that, Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards. TWBC have chosen to build on flood plain as their strategic policy. They certainly are not taking JBA advice and analysing their own data. This policy is therefore unsound.

(TWBC Comment - map C included within the comments has been appended to this comment)

The map above shows the flood zones for Paddock Wood for 2080. The redlines show a rough guide to the area under consideration. These sites are considered as a potential Local Plan allocation.

The NPPF specifically states 160a) the development should provide wider sustainability benefits to the community that outweigh the flood risk -and too this end TWBC say that there will be betterment of the area by flood mitigation with SUD's- this is in the area where there is no mains drainage and it

is not possible to implement because of the heavy clay and vast amount of water in this area. It is utter nonsense to believe TWBC can improve the flood risk in this area. There is no future proof for these sites either 160b) these developments will not be safe for a lifetime and the more houses they build here the more chance of increasing the flood risk elsewhere. This is poor planning unsustainable and unsound. The map above shows TWBC own map for climate change in Paddock Wood Appendix D and the site overlaid with STR/SS 1 Paddock Wood and East Capel Strategic policy. Overlays in red show the Proposed parcels of land earmarked for development. ((Eastern parcel not fully drawn.) There is something wrong with a Local Planning Policy when you have to trawl through wonderful sounding aspirations and justifications when actually the truth is very damaging and has far wider implications for the communities both within TWB Paddock Wood and Tudeley and surrounding boroughs TMB and Maidstone. I find these proposals very disturbing, poorly thought out, very wrong unsound and unjustifiable.

NPPF 157 All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations (NPPF 157 d). Well looking at Appendix DI think TWBC should be planning to build elsewhere.

TWBC will however complete Sequential and Exceptional tests. These tests- Sequential and Exception Tests will be used to show it is safe to build at Paddock Wood and Capel Parish, but this test is supposed to be used to steer new development to areas with the lowest probability of flooding i.e. Flood Zone 1 and the Exception test is to be used as set out in paragraph 102 of the NPPF, is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Well there are 513 sites-74 sites = 439 other sites and NONE of these are considered a more suitable sites?. There are other safer sites than Paddock Wood. Five Oak Green and Tudeley.

The real TEST- will be- will there be people to BUY these houses....I would never buy a house in Paddock Wood or Five Oak Green-there is a huge flooding issue and no amount of :Strategic Storage, flood defences, Increased channel conveyance, new channels, raising level of occupied floors of buildings above ground level- would induce me to buy a home in either of these places. I think it is wrong to expect others to do so. Hopefully builders will realize this too and market forces will prevail-they will have the sense **not to build homes they cannot sell- even if there is no common sense at TWBC. Building at Paddock Wood goes against NPPF guidelines and should not be allowed in such large nos.**

All homes should be raised well above the ground- which would make these homes expensive for builders to build and potential homeowners to buy. This will not fulfil the requirement for affordable housing at Paddock Wood.

I have also read in reports that the ground water system is acknowledged not to be fully understood especially when linked to climate change scenarios and I know Five Oak Green has this issue-as milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible. Current understanding of the risks posed by groundwater flooding is limited and mapping of flood risk from groundwater sources is in its infancy SFRA p37

Still it is believed ASGW that for example, more than 75% of the area within the 1km grid squares surrounding the Whetsted and Tudeley Hale as well as the area north of Five Oak Green are susceptible to groundwater flooding'

Paragraph 102 of the NPPF, sets out a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Again, why chose so many sites fraught with major difficulties that will only exacerbate over the decades and cause misery to families and TWBC are planning this? There are other sites.

It is unsound to build on these flood zones, especially in Paddock Wood where safeguarding land is likely to be required for current or future flood plain management. NPPF 157 b) TWBC are not doing this and as such the plan has not been positively prepared.

Question 6

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The development at Paddock Wood should be restricted to a maximum of 1000 to 1500 homes and should all be raised well above ground level. Homes should be built in smaller groups on well researched plots that will be future proof. All homes should be built on mains drains. And all other developments linked into these drains as well. Conclusion: This area is unable to support a large number of homes and the total number should be reduced and future proofed.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jane Robertson [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jane Robertson [REDACTED]
Comment ID	PSLP_632
Response Date	28/05/21 14:42
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.6
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Jane Robertson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I object to the closure of Paddock Wood Railway Bridge. From the South where we live (in the Maidstone direction) accessing Paddock Wood makes much more sense to use the railway bridge. Surely closing the bridge is the wrong solution? If we could cross the railway bridge and TURN LEFT to access the shops including Waitrose rather than go down the high street that would be preferable to all. We don't all access Paddock Wood from Tunbridge Wells. Please turn through 180 degrees to appreciate things from our side. In times of flood the 'back route' from Yalding and Laddingford can be flooded. Please keep Paddock Wood shops sustainable. If we can't access them quickly we go elsewhere.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Charles and Fiona Rosenmeyer [REDACTED]
Email Address	[REDACTED]
Address	- Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Charles and Fiona Rosenmeyer [REDACTED]
Comment ID	PSLP_1656
Response Date	03/06/21 18:53
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Charles & Fiona Rosenmeyer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

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Question 5

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My wife and I have read the pre submission local plan for Tunbridge Wells.

While some changes have been made which we support, such as the removal from the plan of the secondary school at the junction of the A26 with the B2017, many of the original draft proposals which most troubled us, as Tonbridge residents, still remain. We therefore repeat our original comments on and objections to the draft plan as comments on and objections to the pre submission plan. Those comments and objections were set out in an email dated 5th November 2019, which is copied below (TWBC: 2019 Regulation 18 comments duplicated below for ease of reference)

The proposal to add 3,500 dwellings to Paddock Wood and 2,800 to Tudeley would lead to considerable increased pressure on already overloaded roads which serve Tonbridge and would change the rural nature of the area for ever. We acknowledge that there are proposals to improve the Woodsgate cross roads and create by-passes for Five Oak Green and Colts Hill, but there is no indication when these may be built. Even if they are built, they will only tend to ameliorate traffic driving east/west to and from the A21 and Tunbridge Wells. They will do nothing to help alleviate congestion on the north/south routes to and from Tonbridge. As the proposed developments would be much closer to Tonbridge than Tunbridge Wells, and as much of the additional commuter and shopping traffic generated would be more likely to travel to Tonbridge than Tunbridge Wells, the developments would have a significant adverse impact on Tonbridge even if there were improvements to the north/south routes, as yet not proposed.

No development of any form, even on a small scale, should take place in Paddock Wood or Tudeley, unless the Woodsgate improvements are made and unless the Five Oak Green and Colts Hill by-passes are constructed in a way which takes traffic away from Tonbridge and towards the A21 and Tunbridge Wells.

We also see that there is a proposal to close Hartlake Road between Golden Green and Tudeley. This road, which forms an informal by-pass to Tonbridge and lies close to the local authority border with Tonbridge, is far more relevant to Tonbridge than Tunbridge Wells. During the morning rush hour the A26 is regularly at a standstill in north Tonbridge. As a result Hartlake Road is regularly used by north Tonbridge residents and those of the settlements around north Tonbridge, including Golden Green, to gain access to and from the A21. If Hartlake Road were closed it would make the A26 even more congested. No steps should be taken to close Hartlake Road until an overall highways solution is found for the A26 to bypass north Tonbridge and for improved access to the A21 to be provided.

There are many places within the boundaries of Tunbridge Wells borough where if houses must be built and all brown land sites have been used, poor quality green belt could be surrendered for the purpose. In our view, to use flood plain land with poor access and poor services on Tonbridge's doorstep is to try to transfer some of Tunbridge Wells's problems to Tonbridge. An analogy would exist if Wealden District Council were to try to build 6,000 houses and support developments adjacent to the Ramslye estate.

(TWBC - Regulation 18 comments dated 5th November 2019)

Tunbridge Wells draft local plan We have read the draft plan, particularly as to its possible effect on Tonbridge, where we live. We have also read the submission to your council by Tom Tugendhat MP. We wish to support his comments and those of Tonbridge and Malling District Council about the proposals in the plan in so far as they affect Tonbridge. We also wish to make the following additional comments about the proposals for Tudeley/Capel, Paddock Wood, Woodgate Way and Mabledon, all of which are on Tonbridge's doorstep.

Generally There is a considerable lack of information in the draft or in reports appended to it showing the likely effect on Tonbridge of the proposals, why Tonbridge should be expected to accept that effect and who, other than the council tax payers of Tonbridge, will pay for the costs of ameliorating it.

Green belt Whilst the draft mentions the green belt, in relation to Mabledon and Tudeley/Capel it must be remembered that what is proposed is not building in the green belt protecting Tunbridge Wells but in the green belt protecting Tonbridge. So the case needs to be made for invading that green space which will have little effect on Tunbridge Wells (other to help it hit its targets) but will have a major effect on Tonbridge, which is not even asking for the development.

Roads and road transport 1. Tonbridge has only one major rail crossing and one major river crossing in the town. That leads to regular congestion, particularly at the start and end of the working day and in the afternoons when the schools break up. Any new development in the neighbourhood of Tonbridge will have an effect on bus services, parking and the emission of CO2 and other harmful substances. It is not sufficient to state, as does the draft, that these issues should be considered as part of a detailed planning application; Tonbridge, which has not asked for these proposals but will be affected far more by them than Tunbridge Wells, should have access to data and reports now while the plan is still a draft and not later when it will be claimed as a fait accompli. 2. In the same way, Tonbridge should be told now what alterations to local roads are proposed. The roads around Tudeley are local, narrow, winding, prone to flooding, dangerous in places and already overused. The principal road from Paddock Wood to Tunbridge Wells already needs considerable improvement, not least a by-pass to Colts Hill; no such improvements are proposed by the relevant highway authority. If Paddock Wood is doubled in size as is proposed, major improvements will also be required to the principal route between the town and Tonbridge. 3. New housing will generate additional private car journeys and delivery journeys. It would be facile to suggest that most food shoppers from any development at Tudeley/Capel would carry out their major food shop anywhere other than Tonbridge. It is also facile to suggest as the draft implies that commuters from Tudeley/Capel would drive to Paddock Wood to board a train for London. To do so would increase their overall travel times and increase the cost of their train tickets. 4. A new school at Woodgate Way would also increase car traffic not least as there is no obvious way other than the private car by which teachers and pupils can reach the site. There is no principal bus route, no cycle lane and it is too far to walk (and dangerous to do so) either from Tudeley or Tonbridge. 5. As people shop increasingly on-line, there should be a study on the additional road miles in the vicinity of Tonbridge, which will be generated by these proposals. For instance, it is likely that many food deliveries ordered on-line will be delivered from Tonbridge. Also Royal Mail post for the area, initially delivered to Strood, is driven by articulated lorries into Tonbridge via the A26 for local sorting in the Royal Mail facility in Tonbridge. Deliveries from there to Paddock Wood and Tudeley and collections in reverse are bound to add materially to the use of the surrounding roads.

Train travel The plan does not say whether the rail transport authorities would support or fund a new station at Tudeley. The line between Tonbridge and Paddock Wood is already congested at peak times. Those commuting from Tonbridge should be informed now what effect the draft proposals would be likely to have on frequency of services, availability of seats, choice of destinations and what rail improvements are required, who will fund them and when they will be carried out.

Flood defences A material part of the proposed Tudeley/Capel development area lies on the Medway flood plain at a height above sea level of only 50 feet or less. Even though the remainder of the site rises gently above that level, much of it has flooded in the past and the proposals for further defences at Leigh have yet to be carried out. Even if they are, an assessment should be made now of the likelihood/risk of future flooding on the site given climate change, the slow sinking of the landmass and the rising of sea levels.

Schools and healthcare The draft makes a proposal for a new secondary school but says little about the need for additional infant and junior schools and additional doctor's surgeries and supporting medical services the need for which will be generated by the additional housing proposed. As the likely effect will be disproportionally laid at Tonbridge's door, there should be studies now in support of the draft realistically to measure that effect rather than later when a new local plan has been adopted.

Services It is not good enough to say, as does the draft, that these are issues to be considered in the future when the plan has been adopted. As the supply of services may affect Tonbridge, Tonbridge residents should be told now what that effect will be. For instance; Gas; will the supply come from Tonbridge, what route will it take, and what impact will it have on local supplies?

Sewage; where will the sewage be treated, by what route will the sewer pipes take it there, will it be pumped, will it have to cross the railway and the Medway and what effect will it have on the already stretched treatment plant in Tonbridge?

Electricity; what additional generating capacity will be required, where will it be sourced, what renewable capacity will be generated on site and what if any additional high tension supplies will need to be brought in?

Internet and mobile 'phones; what if any disruption to internet availability in Tonbridge will be needed to supply services to the proposed new development? Mobile coverage is already patchy in the area. What binding proposals will there be to ensure adequate coverage?

The draft should deal with all these issues before it goes for consideration by the planning inspector or the minister so that the residents and taxpayers of Tonbridge may have a full understanding of the proposals, which are likely to affect them far more than the inhabitants of Tunbridge Wells.

As Tonbridge residents we feel that the draft reveals that the Tunbridge Wells Council, concerned about development in its own back yard, has cynically decided to place that development in Tonbridge's back yard, with Tonbridge being expected to pick up many of the ancillary costs, financial, social and environmental.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_131a-c

Comment

Agent	Mr Simon Bell ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Knights Solicitors
Address	Regency House 25 High Street Tunbridge Wells TN1 1UT
Consultee	Save Capel ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Save Capel ([REDACTED])
Comment ID	PSLP_1981
Response Date	03/06/21 18:51
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-3_Appendices.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-1_Cover Letter.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-2_Representation.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Save Capel
Question 2	

Agent's Name and Organisation (if applicable) Knights Solicitors

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Paragraph No(s) 5.153-5.229

Policies Map (Inset Map No(s)) 30

[TWBC: for further comments by Save Capel, please see Comment Numbers PSLP_1964 and PSLP_1973-1987]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please see attached: "Representation by Save Capel under Regulation 19", dated 3rd June 2021, and Appendices

[TWBC: the following extract is from "Representation by Save Capel under Regulation 19" - for the full representation and appendices, please see supporting documents]

1 **STR/SS 2 The Strategy for Paddock Wood Town Centre**

5.1. Masterplanning for this allocation policy is NOT in the public domain although considerable work has been undertaken on it. It will only be available as an SPD at a later stage.

5.2. It is therefore not justified that this policy is consistent with STR/SS 1.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Save Capel has sought to be actively involved in engaging with the Council throughout this review of the Local Plan. As a group we have developed particular expertise and have undertaken significant and extensive research in respect of the effects of the policies to which we have made representations. We consider that we will be able to assist the Inspector(s) examining the final submission significantly.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-1 Cover Letter.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-2 Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-3 Appendices.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Michele Sinclair [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Michele Sinclair [REDACTED]
Comment ID	PSLP_336
Response Date	24/05/21 14:55
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Web
Version	0.5
Question 1	
Respondent's Name and/or Organisation	Michele Sinclair Paddock Wood Residents' Association
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS1 Strategy for Paddock Wood, including land at east Capel	
STR/SS2	
STR/PW1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My name is Michele Sinclair and I have been a resident of Paddock Wood since 1983. I am now retired but was Headteacher of Sackville School, Hildenborough, for 14 years prior to retirement.

I am the Chair of Paddock Wood Residents' Association, the Chair of Paddock Wood University of the Third Age - the largest community group in Paddock Wood and I am a member of Paddock Wood Flower Club. I have been involved in a number of different local associations over the years. I have brought my children up in Paddock Wood and they both attended Paddock Wood Primary School and then Bennett Memorial School, Tunbridge Wells.

As a long term resident of a small rural town I am most concerned at the impact that these vast changes will have on all residents, their children and visitors to the town.

I am not qualified to make any statement on the legality of the plan or whether it is compliant, however, I am qualified to make statements on the soundness of it.

FAIRNESS AND BALANCE

- . This proposal has been rushed through during lockdown when residents were only permitted to leave their homes for essential journeys; communication and consultation with the local population during the pandemic and lockdown has been minimal. Therefore, there is probably little realisation in many of the population of the impact this further planned town expansion will have on their lives during construction and beyond.
- . Many people do not have access to computers and those without internet access were invited to "make an appointment at Tunbridge Wells Borough Council to view the plan" - as we were under government rules not to venture from our homes, this was both disingenuous and against government rules. Our Library has been closed since March 2020 because of Covid so no-one could use the computing facilities in it.
- . As a result of this lack of proper consultation during the pandemic, organised opposition has been extremely difficult, therefore, this development must not proceed before a mass meeting of Paddock Wood and East Capel residents is called to explain the plans and to satisfactorily allay the many serious concerns that residents have, and any final decisions must be postponed so that a full and proper consultation can take place.
- . The Plan contains many hundreds of pages, written in almost unintelligible language with much repetition. No layman, no matter how concerned, can be expected to understand all the technical details, or to plough through so many hundreds of pages of such turgid prose, when with the best will in the world, it is not understood.
- . The borough of Tunbridge Wells is large, yet thousands of houses are proposed for a small area of the borough, which is neither fair nor equitable. Paddock Wood currently has three housing development sites in construction: it would be more sensible to see how these 1,000 extra houses,

people and cars settle in before any more major developments are permitted. Paddock Wood Town Council voted against the plans but were overridden by the Borough Council. Our town will more than double in size in this plan is approved and materially alter all our way of life.

- . Most of this proposed development is in Green Belt or Flood Zone and no Brown Field sites have been identified in it at all. Clearly it is more cost effective for developers to build from scratch, but it is much better to build on Brown Field sites first. Why have no Brown Field sites been identified?

JUSTIFICATION

- . The railway station at Paddock Wood has been stated as a major factor for the location of this development but when one sees the numbers of cars now in the station car parks this must be seriously questioned and the station should not be a major factor in decision making for such a massive development, nor justify a need for the expansion into green belt, flood zones and destroying prime arable land. Our rail station has a good service into London, however, the trains come up from the coast, stopping at many places, so that by the time they reach Paddock Wood they are virtually full and by Tonbridge, the next station up, it is standing room only: Southern Rail have no plans to increase capacity on the line.
- . There is a reasonable up-take of property currently under construction to the east of the town, but many more homes are still under construction and some time from release to potential buyers. Based on house prices on these new developments under construction it is unlikely that any could be considered affordable for first time buyers from Kent.
- . The national birth-rate is falling and government plans to restrict immigration to those with the skills needed in the workplace will also have an effect to decrease the future population. Where is the justification for this level of housing?
- . The Office for National Statistics' data for future housing requirements is in error in Coventry, and therefore the numbers planned/required must be seriously questioned for our area.

FLOOD RISK

- . The main objection to the proposals in the Paddock Wood / East Capel area is that land is in designated Flood Zones 2 or 3 and is likely to be inundated by river and water courses, witnessed by many Environmental Agency flood alerts over the last and many previous Winters. The borough council agreed with this information in the last Local Plan 2016 and designated much of the area now proposed for development as "unsuitable for development" because of the flooding risk. No major flood alleviation has been carried out since so the position cannot be reversed now for the sake of expediency.
- . Currently the land in question is largely used for agriculture or is wooded. In this state the land can absorb large quantities of rainwater into the water table above clay, with run-off available into water courses such as Tudeley Brook and streams unnamed when the land is saturated. It is estimated that the construction of 3,500 properties in the area will reduce the capability to drain naturally by at least 75% due to the footprint of the housing, drives, pathways, cycle tracks, parking areas, current industrial sites, and roads to be constructed. The run-off from the developments will have to drain into the existing water courses leading to a significantly increased risk of flooding of all housing in the area to the west and north west of Paddock Wood.
- . Mitigation, such as allowing water to be accommodated in a new lake to take surface water can seem to give an "appealing" environment as a paper exercise; if the lake is not allowed to fill it will be very unsightly in an urban situation, and when that lake becomes full where does the excess water go? Evaporation rates will be minimal, and it is known that severe weather events are likely to become more frequent and to cause much more flooding as Climate Change continues to occur in the future. Developers must indicate examples of similar developments in flood prone areas where mitigation has proved successful by the methods proposed and calculations should be checked by an "independent authority" which is not under the pressure to build housing: a Strategic Flood Risk Assessment must be carried out by an independent person and not one influenced by a desired outcome, as risk assessments are necessarily subjective and therefore potentially biased. The Environmental Agency must update their assessments based on the proposed new developments.
- . "Betterment" of the existing flood risks to property is required before any new schemes are considered.
- . Currently house holders in the areas of this development can get insurance cover, at a premium, based on historical data of flooding, despite the Environmental Agency's area classifications.

After building 3,500 houses in the designated flood zones, houses may well become uninsurable against flooding risk. Has the borough council consulted insurers on this issue?

- . If the development is completed and flooding occurs, as expected, with the losses to property and potentially human life, who will be held responsible for the decision to build in Flood Zones 2 and 3? Will it be the head of Planning at Tunbridge Wells Borough Council? Will it be the developers responsible for the construction? Will it be “consultants” employed by the above to provide the desired answers? Specific people are taking the decisions and those people must be accountable for any future flooding.
- . The Maidstone Road surface water drain is overloaded whenever heavy rain occurs. The solution to the regular flooding of the junction of Nursery Road and Eldon Way was to lay a new relief pipe from the flooding area in a westerly direction to the nearest fluvial take away stream. This will be effective as long as the water level in that stream allows flow and no reverse flow occurs. This was clearly the cheapest option and has been successful to date but not when new housing overloads that stream with substantially more run-off.
- . Very localised flooding has occurred in the past when water courses under roads have become blocked in times of high rainfall. Often there is considerable reduction in flow capability by small pipe diameters and inevitably these will be blocked by floating obstacles carried by the fast water flows. Housing to the north and north west of Paddock Wood is regularly threatened with flooding – I give the Environment Agency warnings as evidence.
- . The wooded area of land absorbs a substantial amount of water – I offer evidence with the Environment Agency’s maps showing where Flood Zone 3 merges into Flood Zone 2 where the land is heavily wooded: crops and trees soak up water, but concrete does not.

INFRASTRUCTURE

- . Paddock Wood has three major housing developments in progress – Mascall’s Court Farm, Mascall’s Farm and Church Road, which will add approximately 800 new houses with the option on these sites of a further 360. There have been no infrastructure changes coming from this current expansion so that the current residents can live their lives without increased difficulties due to the expected population increase. The Borough Council “infrastructure first” political statement has not been followed through, nor will it be as commercial interests are being allowed to dominate. Tunbridge Wells Borough Council has failed to offer any financial support to improve the infrastructure from current developments, with the likely 3,000 extra population.
- . Our bus service to surrounding local towns is woefully inadequate and has been severely cut in recent times and so all the new residents of the current developments will be car users of necessity.
- . The existing medical centre already struggles to cope, with no doctor working a 5- day week from choice. The Borough Council cannot force commercial interests to build another medical centre, despite the Medical Commissioning Team saying that a further centre will be needed. Often only locum doctors are available for residents with no continuity of care and the difficulties for all local residents of getting appointments.
- . Foul effluent capacity has been reached with new housing to the east of the town in some cases having to install cess pit collection. The pumping station has been at capacity for many years and simply limps along. One can foresee in times of high rainfall the effluent treatment plant for Paddock Wood overflowing raw sewage directly into the Medway without substantial investment.
- . Southern Water said some years ago that the Paddock Wood Pumping Station was at capacity: a proposed foul water ring main for Paddock Wood has **not** materialised. Southern Water has recently conducted an “internal review of modelling processes and standards” as an alternative to installing a Pumping Station and Rising Main and decided that their previous model was out of date and that a further 246 properties at Church Road can now be added to the drainage system. Modelling can produce almost whatever outcome the modeller desires, but this solution of course is so much more cost effective than building what is desperately required for Paddock Wood. When it is completely overwhelmed by heavy rainfall, we run the real risk of raw sewage flowing into our homes and streets because of this irresponsible modelling. There has been localised flooding in the Church Road area on several occasions and allowing these properties to connect to the network is a recipe for disaster. To accommodate the other new properties currently being built, Southern Water further propose putting holding tanks for sewage in Ringden Avenue which is archaic in this day and age, but it is a cheap solution. A new Pumping Station is required for all the new properties currently being built and most certainly before any other development is permitted.
- . Kent County Council refused to fund provision of a new primary school to coincide with the 3000 extra population expected with the current expansion in progress as it was not “required.” KCC

knows that it will be cheaper to provide extra Portakabins and another teacher on the existing primary school site and infill at all local primary schools. New schooling will have to be put in early within this proposed development project to improve infrastructure but needs to be funded and developers will not put in funding when houses are not sold.

- . Social Care has been significantly reduced in Paddock Wood, there is no care home for the elderly – Capel Grange is the nearest facility, and other facilities for the elderly are non-existent. The few child-care facilities are full and only one has purpose-built accommodation.
- . Carbon fibre networks are not widely available to existing houses for rapid internet service which will deter anyone working from home and thus put further pressure on the need to commute with over-crowded trains.
- . Fresh water supply will be an issue as it is noticeable that supply line pressure is dropping with the impact of demand from new housing taking its toll. This will require more investment from S.E. Water / Southern Water and / or the developers and they all seem to be extremely reluctant to make any sort of commitment.
- . In summary, infrastructure will be the last thing addressed based on historical performance and all the current residents of Paddock Wood will be made to suffer for many, many years to come.

FOOD SECURITY AND BIO-DIVERSITY

- . We have seen with Brexit, that the trading of goods and vaccine supplies across our borders is very susceptible to disruption. It is essential therefore, for our small island to be more self-sufficient. This proposal removes hundreds of acres of arable land from the food supply chain and that must not be permitted: one of the farms in question was mentioned in the Domesday Book.
- . There are large swathes of wooded areas under this threat and some are ancient woodlands, e.g. Whetsted Wood. Currently we have a wonderfully bio-diverse area with a vast variety of wildlife, from bats to badgers to foxes to hedgehogs to dormice etc. plus a significant array of birdlife including owls, woodpeckers, herons, hawks, buzzards, kingfishers, cuckoos, little egrets, and the more common garden birds regularly seen. The land is home to wood anemones, bluebells, wild garlic, lady's smock and many other plants too numerous to mention. Residents have witnessed the current developers cutting down trees with nesting birds and with preservation orders, demolishing bat habitats and more - Tunbridge Wells Borough Council Officers have not protected these trees and the wildlife, which gives no comfort in their future actions. When commercial interests hold sway, biodiversity is completely ignored, and it must be protected for our future and our children's future.
- . Much of the area earmarked for this development has been used for informal recreation for many decades and it has never been more important than during this last 18 months of the pandemic when it was so important to exercise outside. Areas of open land available for recreation and dog walking are rapidly disappearing. The developers are paying lip-service to "green spaces": we already have delightful green spaces and do not need to have any manufactured spaces, and do not need our current spaces covered in concrete with houses, roads and the like.
- . Housing must be built using methods and materials at low or zero carbon input but there appear to be no clear guidelines for developers. The current new housing developments in Paddock Wood are not incorporating low energy methods of heat pumps and solar cells by decree.

EMPLOYMENT

- . The plans show housing construction but little building for employment; perhaps this is because there is minimal profit in this type of building as opposed to housing which commands a premium. Most of the employment in Paddock Wood is warehousing and storage, with a little light industry, and very little office space. Warehousing offers a very limited number of jobs so where are all these new people going to work? Tunbridge Wells Borough Council are not doing anything to stimulate employment in the Paddock Wood area so why is a huge increase in housing being proposed as there is no demand for people to move here?
- . New buyers may well have to commute to London and hence the development of a thriving community in Paddock Wood may only become another commuter town and part of an ugly urban sprawl.

TRAFFIC

- . A recent inspection of the new development at Mascall's Court Farm (the most advanced) indicates that occupied houses have one and two cars. This means maybe three hundred further cars already into the local traffic systems. The effect therefore of 3,500 new houses in the West Paddock Wood / East Capel could lead to a further 5,000 vehicles. Buses and cycle lanes are good but as soon as substantial supermarket shopping is required a car is essential. People will

slowly change habits and attitudes, but cars will remain essential to buyers of these houses as the distance to the shops is too far to walk with shopping. Our supermarket carpark is always full now and it will be overwhelmed with so many more cars.

- . The nonsensical proposal to close the main east/west through route to all but buses in order to “force” people to walk beggars’ belief! We have an ambulance Make Ready Depot in Eldon Way, north of the railway bridge, and ambulances are regularly dispatched on emergency calls from the depot – despite a planning ruling stating that they must not. For residents north of the railway bridge a short journey into the centre of Paddock Wood would, with this proposal, result in a journey of some many miles and all the resultant particulates being emitted into the air. Heavy goods lorries will be forced to use small and unsuitable roads around the town for access and this will cause untold disruption to the residents of these small lanes. Residents of out-lying villages will all be deterred from coming to Paddock Wood because of the difficulties that this closure would cause and force them to make longer journeys further afield for their shopping.
- . This same document states that Old Kent Road is a “through road” when it is a narrow one-way road, unsuitable for anything other than light traffic.
- . The proposal to remove parking in the centre of Paddock Wood to “make it look more attractive” will effectively kill all the current small business who thrive there. As part of the Covid road closure schemes, Commercial Road was closed to through traffic which resulted in disabled drivers not being able to access shops, delivery vehicles being unable to supply the supermarkets and a marked drop in shoppers to all the local businesses. The Town Council successfully appealed against it to Kent County Council, and it was rescinded.
- . There are many existing pinch points to traffic flow on the Maidstone Road both to the south of the rail bridge by Evernden cycle shop and Tom Bell fish and chip shop and to the north by the Aycliffe dentist and residential properties. The proposed significant developments will have a huge increased traffic load on this vital link to the centre of Paddock Wood. Large articulated lorries currently use the road north of the railway where it is very narrow, to enter the Eldon Way industrial estate and then past the “back” way into Transfesa. Vehicles over 7.5t regularly cross the railway bridge contrary to the road sign. If this Local Plan is given approval, then as part of the infrastructure, a new road must be constructed to take the heavy vehicles away from these narrow pinch-points and residential properties.
- . There are no plans in the proposed Local Plan to improve roads other than a by-pass of Five Oak Green which was the cheapest option by creating a new road from Capel Hill towards Tonbridge, off an already busy road to Pembury. The Health and Safety of the local population is not being considered as young children and adults will be exposed to massive traffic dangers and air pollution which will blight their lives.
- . If there was a presence of Traffic Wardens and PCSOs in Paddock Wood, then motorists who park illegally on pavements and yellow lines could be dealt with properly to enforce the law.
- . We would welcome the 20-mph speed limit as no traffic, other than a very occasional vehicle, keeps within the 30mph limit on Maidstone Road the B2160 and it feels very dangerous waking on the pavement so close to speeding traffic. There has not been a speed check on vehicles by police in recent memory whereas it used to be checked maybe 2-3 times per year and was an effective measure. Police presence is rare unless there is a road accident and a recent attempt to contact a local PCSO proved almost impossible. If there was a presence of Traffic Wardens and PCSOs in Paddock Wood, then motorists who park illegally on pavements and yellow lines could be dealt with properly to enforce the law.
- . The County Police Commissioner states a significant increase in police numbers but they are not being deployed in Paddock Wood/East Capel as there is no evidence of their presence. Our police station has been sold for re-development and we must telephone a station 8 miles away if we need a policeman: Paddock Wood effectively has no police presence.

In conclusion the proposed Local Plan is an unmitigated disaster for Paddock Wood/East Capel residents on so many grounds, and if it is approved our quality of life will suffer greatly over many years. Commercial interests have been allowed to influence the planners to such a degree that there the needs of the residents have been completely subsumed: please do not permit this to happen.

Michèle Sinclair

Paddock Wood residents' Association.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southern Water Services Plc
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Southern Water Services Plc [REDACTED]
Comment ID	PSLP_1191
Response Date	03/06/21 15:31
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Southern Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 2 The Strategy for Paddock Wood Town Centre	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes

Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Southern Water is the statutory wastewater undertaker for Paddock Wood. Our assessment has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In consideration of the above, we recommend the following criterion for Policy STR/SS 2

Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Kevin Taylor [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Kevin Taylor [REDACTED]
Comment ID	PSLP_1418
Response Date	04/06/21 14:35
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Kevin Taylor
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Local Cycling and Walking Infrastructure Plan: Phase 2

For starters I want to put on record that the way this consultation has been put together in a way to obscure from the public the true agenda as so much detail appears to have been deliberately hidden in the sub reports. For example the proposal to close the railway bridge in Paddock Wood to cars.

However rather than being totally negative to the proposals I must say that there are some elements that I am in agreement. Those items include the new walking and bike routes such as the Hawkhurst Branch from Paddock Wood. De-cluttering by the removal of fencing etc.

Closure of the road to cars over the railway bridge in Maidstone Road is not a sensible proposal as it will cause an awful lot of chaos and will not result in the assumed improvements. For starters it will mean lots of motorists will have to take a long diversion to get into town. How can it be environmentally good to increase the mileage of each car of between 2 to 3 miles? Also cars wishing to access Paddock Wood will be forced to go down Badsell Road. Even at the best of times that road has been busy and is likely to be even busier once the new developments at Capel and Mascals are completed. You can only justify closing the railway bridge if there is a via alternative. Please can you suggest one?

Whilst I understand the intention is to persuade people to use their bikes, walk or use buses I suspect that very few persons will be using the bridge for those purposes. For starters the North is predominately industrial/trading. Those coming to Paddock Wood by train will have absolutely no reason to use the bridge unless they drive to the station and most of those live too far away to walk or bicycle. Chances of persons switching to bus is also problematic as the current bus services for Paddock Wood are hardly frequent and there is no service in the evenings. Unless Kent County Council is prepared to provide more frequent subsidised bus services in the area there is unlikely to be a modal shift away from cars.

Another concern to me is the proposal of a town wide speed limit of 20 mph for Paddock Wood. Have you tried driving in Tonbridge? It is not natural doing 20 mph for long periods. I believe these speed limits are of dubious value.

Also I want to point out that the recent experiment to close the lower half of Commercial Road to cars was an absolute nightmare. Like many I was incensed that this introduced with absolutely no consultation with locals. Closing roads to cars in Paddock Wood such as the Railway Bridge and Commercial Road would result in inadequate provision of routes in the town. How would the town cope with roadworks or accidents? With the proposed increase in housing it is likely things will get worse.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Richard Taylor [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Richard Taylor [REDACTED]
Comment ID	PSLP_1435
Response Date	03/06/21 17:42
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Richard Taylor
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I feel like your current plan in regards to closing Hartlake Road disrespects the residents of Tonbridge, Golden Green, East Peckham and Tudeley.

The proposal to shut Hartlake Road will have a massive effect on the already busy Hadlow Road in Tonbridge and the A228 between Five Oak Green and East Peckham.

The proposed plans include building on a flood plain and you haven't even considered additional infrastructure to support the thousand or so homes you want to build.

All this plan is going to achieve is money in the pockets of the councils and the people proposing the ideas. Including the builders.

The area doesn't need more houses, it needs less landlords. It needs more home owners and less tenants. This is why the area is in such a mess. More landlords exploiting those with less money who can't afford their own homes, which leads to less homes available for sale.

I've been saying it for years but no one listens.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_125

Comment

Agent	Abraham Laker [REDACTED]
Email Address	[REDACTED]
Company / Organisation	MRPP
Address	21 Buckingham Street London WC2N 6EF
Consultee	[REDACTED]
Company / Organisation	Tesco Stores Ltd
Address	Cirrus Building Shire Park WELWYN GARDEN CITY AL7 1AB
Event Name	Pre-Submission Local Plan
Comment by	Tesco Stores Ltd [REDACTED]
Comment ID	PSLP_1930
Response Date	04/06/21 12:25
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1921-1930 (not inclusive)_MRPP for Tesco_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Tesco Stores
Question 2	
Agent's Name and Organisation (if applicable)	MRPP
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 6 Transport and Parking

Map 27, Map 67

[TWBC: this representation has been input against Policies STR 1, STR 6, AL/PE 6, EN 15, PSTR/PE 1, STR/SS 1 and STR/SS 2 – see Comment Numbers PSLP_1921, PSLP_1923, PSLP_1924, PSLP_1926, PSLP_1927, PSLP_1928 and PSLP_1930. Full copy of representation attached as supporting information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

Don't know

Is sound

Don't know

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

REPRESENTATIONS ON BEHALF OF TESCO STORES LIMITED TOWN AND COUNTRY PLANNING (LOCAL PLANNING) REGULATIONS 2012 TUNBRIDGE WELLS (REGULATION 19) LOCAL PLAN CONSULTATION

As you know, we act on behalf of Tesco Stores Ltd, in respect of their various interests in Tunbridge Wells Borough and respond on their behalf to the Regulation 19 Tunbridge Wells Local Plan consultation, under the following headings.

Background

MRPP has extensive knowledge of both Tesco's activities in the Borough and the present (and historic) formalisation of planning policy in the Borough. We welcome the opportunity to engage with the emerging Local Plan and do so positively both in terms of representing our client's interests, and in terms of helping the Council to formulate effective policies which support development for the benefit of the Borough's businesses and residents.

Tesco Stores Ltd engaged with various components of the adopted Local Plan, both in terms of the development needs identified in the existing Core Strategy (primarily in relation to retail capacity) and the treatment of its various interests in the Borough in the subsequent Site Allocations DPD. We have, on their behalf, thoroughly reviewed the Reg 19 Local Plan and have sought to respond only to those policies and issues which directly or indirectly affect their property interests. We trust that this targeted approach assists officers, who will find our comments generally supportive, subject to several clarifications regarding evidence and the justification for designations, allocations and policies.

For ease, we set out our representations in a single letter and have, for each relevant policy or supporting text, used the Council's recommended responses (i.e. objection, support, support with conditions, or general observation). We have also set out some basic background to our client's presence in the Borough.

Tesco in Royal Tunbridge Wells

Tesco has been represented in Royal Tunbridge Wells since 1969 when its store at 29 Grosvenor Road first opened. Tesco has continued to serve the community, uninterrupted, since then and has subsequently enhanced its presence to now include:

- Supermarket Format – Woodsgate Corner (Pembury)
- Metro Format – Grosvenor Road, Tunbridge Wells
- Rye Road, Hawkhurst
- Express Format - St. Johns Road (Tunbridge Wells), London Road (Southborough) and Commercial Road (Paddock Wood)
- One Stop Format – Badsell Road (Five Oak Green), Forest Road (Hawkenbury)

It is well documented that Tesco, having secured planning permission for a substantial replacement superstore at Pembury, took the difficult decision not to implement this, arising from significant changes in the convenience shopping sector and other local factors. However, several of its stores, including Pembury, have undergone improvements as part of the firm's 'refresh' programme, with a greater focus on customers, merchandising and the quality of the retail environment.

Responses to Policies

Policy STR/SS2 - Strategy for Paddock Wood Town Centre (support/object with conditions)

Tesco notes and supports the shift in the Council's approach here, from a relatively small, allocated area in the present Local Plan (i.e., Site Allocations DPD), to a much broader policy approach towards the town centre generally.

However, the previous objections remain to the town centre allocations here, primarily on the basis that the Council's focus on commercial and community facilities, and enhanced public realm (whilst laudable), is unrealistic given complex ownership, site constraints (e.g., flooding) and a lack of viability. Indeed, the Council's own Viability Consultant previously advised the Council that the current allocation was fundamentally unviable, even taking account of a modest number of dwellings.

The previous objection sought assurances from the Council that it would: (a) use its own resources to coordinate with landowners in respect of the intended Masterplan; (b) use its compulsory purchase powers to help assemble the site; (c) support high density residential development over ground floor commercial uses to improve viability; and (d) seek s106 obligations from urban extension schemes elsewhere in Paddock Wood to fund public realm improvements in the town centre. It is acknowledged that the foregoing has been included within the policy criteria and these additional points of clarity are welcomed.

The Council's aspiration for a Master planned approach remains, with a separate Paddock Wood Town Centre, Framework Masterplan SPD to set out the strategic vision of the town centre. However, the production of the town centre masterplan is subject to feeding into the production of the four wider masterplans for the surrounding parcels of land surrounding Paddock Wood for development extension, as identified in Map 27. We uphold our previous objection in which we stated that the latter are long-term, phased proposals which could take many years to come forward and therefore harm the town centre in the meantime and is not an acceptable sustainable planning outcome.

Thus, whilst Tesco still maintains support for the broad redeveloping parts of the town centre, the policy text must reflect relevant constraints and issues as they stand today, and not complicate them further through onerous criteria. This could be addressed by:

1. Removing the need for a town centre masterplan (and certainly the contingency on the wider masterplanning of Paddock Wood);
2. Using Policy STR/PW1 to better define the Council's aspirations

and by also confirming (as the present policy does) that individual sites within the allocated area may come forward now on the basis they do not prejudice the delivery of the intended uses across the wider areas;3. Facilitate and encourage development by making a clear statement about its own position as freeholder of the existing town centre car park;4. Confirming within the policy text that the Council will, if necessary, use its various planning and compulsory purchase powers;5. Setting out the detail of a mechanism for cross-subsidy from growth surrounding Paddock Wood (with necessary changes to those policies and allocations); and6. Reinforcing that higher density residential development will, subject to meeting relevant design criteria, be supported to enhance viability.

Notwithstanding these suggested changes, our sense is that expanding the area covered by the allocation is ultimately problematic and less certain, and should be replaced with a series of smaller, more targeted allocation policies, where, arising from engagement with relevant interests (primarily landowners, but also occupiers, residents, business, and the Town Council) clearly defined allocation policies can be drafted.

Following the previous written representations submitted by MRPP on behalf of Tesco Stores Ltd during the two Regulation 18 consultation stages of the emerging Local Plan, we welcome Tunbridge Wells Borough Council acknowledging part of the previous comments and discussions points raised and implementing them within the various policies identified in this Regulation 19 representation.

We trust our comments are of assistance and we look forward to continuing to liaise with officers and other interest groups in respect of the emerging Local Plan. We reserve the right to attend any hearing sessions on the topic matters we have commented on above should the Inspector need to raise any questions during the Local Plan Examination.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We reserve the right to attend any hearing sessions on the topic matters we have commented on accompanying written representations should the Inspector need to raise any questions during the Local Plan Examination.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jeremy Thompson [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jeremy Thompson [REDACTED]
Comment ID	PSLP_1409
Response Date	04/06/21 16:14
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Jeremy Thompson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I would like to make the following comments.

LCWIP 4.12

The idea of having a Low Traffic Town is a very good idea in theory. However, limiting the flow of traffic over the railway bridge on Maidstone Road will be an economic disaster for businesses in the Town. If this idea was to go ahead the damage to the environment would increase as people wanting to come to the town approaching from the north would have to make a detour along the Whetstead by Pass to the Colts Hill roundabout and then go along Badsell Road and Maidstone Road to enter the Town.

Local Green Space Assessment. Site 150

Recreation Ground and Memorial Park Maidstone Road,

With three new housing developments already being constructed the loss of any green space needs very serious consideration. 89% of the Memorial Playing Field is already designated as local green space and the remaining 11% should also be designated in the same manner. This land was previously mentioned in Regulation 18 and the planning application 20/03848 has still not been scheduled to appear in a TWBC planning committee meeting. It is considered to be an important green space within the settlement that contributes to its character/setting and local visual amenity. There are other sites that are more appropriate within the Town for a Community Centre. If this site is built on then Paddock Wood will no longer be able to host hard ball Cricket matches at a time when cricket has an increasing popularity. The residents of the Town have already made their feelings known through the Parish Poll which has been ignored by our own Town Council. It is worth mentioning that the deeds of this land state that it is for the purpose of providing a recreation ground. I cannot find any mention of a Community Centre or a pre school.

A proposed development on this site by the Girl Guides Association in 1987 was turned down by the Secretary of State and the comments made then are still applicable today.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Carl Tromans [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Carl Tromans [REDACTED]
Comment ID	PSLP_1396
Response Date	03/06/21 23:38
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Carl Tromans
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I wish to formally register my objection to the proposals to permanently , or even temporarily close Hartlake Road as a solution to concerns about increased traffic from the new developments. Hartlake Road has a major bridge over the river for one , and two the road closure would create a major congestion of roads from Hadlow, east Peckham and the whole surrounding area . It's an old historic road , and a relief road for Tonbridge due to the bridging point.

This is not a viable option.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Rebecca Waugh [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rebecca Waugh [REDACTED]
Comment ID	PSLP_1390
Response Date	04/06/21 16:19
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Rebecca Waugh
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been made aware recently that your new plans for the enormous development at Tudeley now includes closing Hartlake Road and I therefore address most of my comments to Policy STR/CA1 The Strategy for Capel Parish and Policy AL/CA1 Tudeley Village.

I have previously emailed to state my objects to the development based on the horrific impact it will have on the environment, the worrying impact it could have on an area which already struggles with flooding and the massive increase in traffic the development will cause.

The answer to reducing traffic cannot be to close the road. That is lazy and incompetent and simply moves the problem to other areas - namely the Hadlow road and Tonbridge town. I live in Golden Green - at one end of Hartlake road. My children (in Reception and Year 1) attend Bishop Chavassee - at the other end of Hartlake road. It currently takes me between 5 and 10 minutes to get there, and the same to get back, morning and afternoon for school drop off and collection. Is your plan for people in my situation that I now need to make a journey all the way through the already overcrowded Tonbridge town centre to the school? A trip which will take at least 45 minutes each way for the next 6 years?! This is not the answer to clearing congestion, you are simply moving the congestion to make it someone else's problem. You are negatively impacting many thousands of lives in the borough of Tonbridge, as well as destroying Kent's beautiful green belt in order to line the pockets of Tunbridge Wells borough council. It is a shameful and cowardly thing to do and I urge you to rethink your plans.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Steve Waugh [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Steve Waugh [REDACTED]
Comment ID	PSLP_1439
Response Date	04/06/21 16:21
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr Stephen Waugh
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I have very recently been made aware of new plans for the enormous development at Tudeley now including closing Hartlake Road and I therefore address most of my comments to Policy STR/CA1 The Strategy for Capel Parish and Policy AL/CA1 Tudeley Village.

I have emailed before stating my objections to the development. This is primarily based on the huge detrimental impact it will have on the environment, the flooding in the area and the massive increase in traffic.

Closing Hartlake Road is a dreadfully lazy and ill-considered idea. It reeks of incompetence. It does nothing more than move the traffic problem to other areas, ie, the Hadlow road and Tonbridge town. My family and I live in Golden Green - at one end of Hartlake road. Our children (in Reception and Year 1) attend Bishop Chavasse - at the other end of Hartlake Road. This is currently a 5 to 10 minutes journey. Do we now need to make a journey all the way through the already overcrowded Tonbridge town centre to the school? A trip which will take at least 45 minutes each way for the next 6 years?! This is not the answer to clearing congestion, you are simply moving the congestion to make it someone else's problem. You are negatively impacting many hundreds of lives in the borough of Tonbridge, as well as destroying Kent's beautiful green belt in order to line the pockets of Tunbridge Wells borough council.

Your plan is ill-considered and fundamentally flawed. It is shameful and cowardly and I urge you to rethink your plans.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Julia Winn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Julia Winn [REDACTED]
Comment ID	PSLP_1415
Response Date	04/06/21 13:50
Consultation Point	Policy STR/SS 2 The Strategy for Paddock Wood Town Centre (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Julia Winn & Don Rossiter
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 2 The Strategy for Paddock Wood Town Centre

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Teething problems with a new computer means I am unable to download your forms so hope you will accept this email.

It has been brought to our notice that plans include closing the railway bridge at Paddock Wood to vehicles except buses. We live in East Peckham and use Paddock Wood for main shopping, for vets and dentist. The idea of closing the bridge seems preposterous. The diversion for traffic to get to the town will add to pollution and congestion. Many people here work in Paddock Wood and use the GP surgery. When I first heard this proposal I almost felt it was a joke. At a time when we are supposed to be reducing vehicle pollution this is going to add to it greatly and will especially affect the residents living on the proposed route.

We also feel it will have a detrimental effect on the businesses in Paddock Wood. There is very little that cannot be purchased in the town. It is small, friendly and the free hours parking plus free parking at Waitrose are a great attraction. PW is a much more attractive proposition for shopping than big towns but with the closure of the bridge there will be no incentive to go there rather than Tonbridge, especially for people even further away than East Peckham.

We are also concerned to hear that there are proposals to shut Hartlake Road due to occasional flooding. It is a popular route to by-pass Tonbridge congestion and the most straightforward to access the A21. Pubs and other businesses along there will suffer and most likely close. It does not get so busy it causes problems. It is the only place to cross the river between East Peckham and Tonbridge.

The proposal to put so many new houses in the area will also be detrimental to the area. So called 'affordable' housing will be a minimum and is not affordable to a lot of young people. I have a daughter who would love to live where she grew up and buy a house locally but she and her husband both work for charities and do not earn enough to buy anything within a reasonable distance of their work. My son and his wife are sadly looking to move to Scotland where housing is much cheaper. The majority of the new properties will be purchased by people wanting to move in to the local area and not by local people already resident who want to get on the property ladder, thus pushing property prices up again.

Kentish people are being priced out of Kent. More housing squashed in to an area without the infrastructure will not improve the situation. It will eventually make it more undesirable.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Local Plan Regulation 19 representations in document order

**Comments on Section 5: Place
Shaping Policies: Strategic Sites:
Tudeley Village and Paddock Wood,
including land at east Capel: Policy
STR/SS 3: The Strategy for Tudeley
Village**

Comment

Consultee	Paul Alderman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Paul Alderman [REDACTED]
Comment ID	PSLP_1686
Response Date	04/06/21 08:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paul Alderman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I moved to Tonbridge with my family five years ago. I am extremely worried and concerned about the plans to turn bulldoze Capel into a building site to build thousands of new properties.

The disruption to the local area, the traffic congestion and knock-on effects will be overwhelming for me and my family – the nearest roundabout to us is already busy, especially during rush hour and the surrounding roads seem to be overrun already.

Although I work in London, we moved to Tonbridge to enjoy a relaxing time at home and feel the new sites would spoil our way of life beyond all recognition for the worse. And, if the vast building project were to go ahead, it would force us to consider moving to a new area.

Please add my contact details to your consultation database so that I can be kept informed of all future consultations on Planning Policy documents. I understand that my comments will be published by the Borough Council, including on its website.

Thank you.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Diana Allchorne [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Diana Allchorne [REDACTED]
Comment ID	PSLP_25
Response Date	01/04/21 10:16
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Diana Allchorne
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3: The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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My objections to the master plan of a new town in Tudeley have already been sent to you. Now you are asking for people to submit their views once again with the use of portals (!). Further evidence of the lack of democracy. There are many people who do not have access to a computer so making it really difficult to put their views before planning. I do not believe that people's views are considered at all. It is not a democracy at all. The only people who have control are the government, property developers, rich landowners, and donors to the Tory party. We who strongly object to houses being built on Green Belt land in the few remaining bits of countryside are accused of 'nimbyism'.

I wish to register my objections to the Tudeley master plan (once again) on the grounds that it is being built on Green Belt land when already our countryside is being wrecked by hideous developments, particularly in Paddock Wood. Also, there will be a greatly increased risk of flooding (already a problem) the air pollution, which has deteriorated rapidly because of more development and thus greater volume of traffic on country lanes. I also object on the grounds of there will be a massive loss of wildlife and wildlife habitats.

Will you go on asking people to resubmit their objections in the hope that they will eventually give up and you can say, 'oh well it is a democracy because we consulted the people?' This appears to be the pattern, however much people do object to the proposals. You may argue that the provision of more housing is a requirement of the government. But you may also be aware that there is a housing 'problem' not a housing shortage. Most of the buyers of these new unaffordable homes are bought by people living in London and not local people who mostly cannot afford them.

[TWBC: further comments received and confirmed as an addition to response on 17/04/21 as follows]:

Many thanks for your prompt response. I wonder how independent government officials i.e. planning inspectors can be. Yes, maybe they are not involved in the local plan, but this could be regarded as a disadvantage compared to someone who has lived and enjoyed the countryside hereabouts. I would be grateful if you could include the comments in my previous email in the consultation. I am very concerned re development on Green belt, the pressure (in both senses of the word) on sewerage systems, water supplies and also the encroachment and trashing of the River Medway. Don't forget we have lost half of our wildlife habitats in recent years and this development will have a very detrimental effect on wildlife. The plans for a road through Five Oak Gn pass through one of the few remaining hop gardens in the area. I am very concerned also about the chumocracy of this government, which I know you can do nothing about, but this has an effect on planning decisions which can be overturned at the drop of a hat or should I say dinner plate? This makes a mockery of democracy and, as the landowner of Tudeley went to Eton, possibly at the same time as Boris, what chance do we stand of a democratic result? I am not hopeful that the wishes of a vast majority of residents will be taken into account or have any effect on the result. These homes will be for a London residents who can afford to move to the country due to the high prices commanded for property, including ex council houses. There is no really affordable housing for local people. My son a lorry driver who is in his 50s can not afford to buy even a studio flat, as he is a single person and two incomes are needed for big mortgages and high rents.

[TWBC: further comments received on 21/04/21 as follows:]

Thank you. I also have major concerns in respect of the traffic this development on Green Belt land will generate. Yesterday I was driving back from Hadlow along Hartlake at around 4pm so not in rush hour (though people rush along this country lane at high speeds) When I reached the narrow railway bridge at Tudeley, which is virtually impossible to take two cars going in opposite directions, there was

a queue of traffic waiting to cross the bridge. It looked as the queue reached back to the junction of Tudeley Lane. I try to avoid the rush hour so I don't know how bad it is at the busiest times but this was supposedly a quiet time of day. This is another example of the effect of the over population of this area and the pressure on country lanes, schools, doctors' surgeries, hospitals etc. It will be absolutely untenable if the population I.e major development on the scale of the Tudeley proposals is allowed to go ahead. I would be grateful if you could include these observations in the Strategy for Tudeley.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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Comment

Consultee	Graeme Anderson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Graeme Anderson [REDACTED]
Comment ID	PSLP_1034
Response Date	03/06/21 10:41
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graeme and Tina Anderson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We write as residents of Royal Tunbridge Wells Borough. Our house is on the B2017, between Five Oak Green and Paddock Wood, adjacent to the proposed East Capel development. We have lived here for twenty-five years and are extremely concerned about the proposed developments and their impact on Tudeley, Five Oak Green and Paddock Wood, given our knowledge of the area and our observations of the local environment and infrastructure in that time.

Creating a garden settlement at Tudeley of a large number of dwellings will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. There will be a significant increase in traffic in to Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every morning.

People living in Tudeley will use Tonbridge Station for commuting and Tonbridge town services that will need more parking. The increase in traffic will be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but we believe that flood risks will increase. Covering farmed fields with houses and roads will make the consequences of Medway flooding more severe and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary in to Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows).

The garden settlement at Tudeley can never be one settlement as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles.

Creating so much housing in Tudeley will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

We believe that housing need calculated by the government can be reduced if it requires development of Green Belt land unless “exceptional circumstances” exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. Recent ONS figures show that population growth in the borough is slowing, making this proposed approach honest and relevant.

We think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge and Paddock Wood.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Hilary Andrews [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Whetsted Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Hilary Andrews [REDACTED]
Comment ID	PSLP_973
Response Date	03/06/21 12:39
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	

Respondent's Name and/or Organisation	Hilary and Nick Andrews
Question 3	

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3 The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is sound	No
----------	----

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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5.206

The internationally important heritage site of All Saints Tudeley and its' Chagall Windows will be utterly transformed for the worse should this development go ahead. This beautiful church, is the only church in the world to have all of its windows designed by Marc Chagall. It's visitors come from around the globe. Its' setting in the picturesque Kent countryside cannot be adequately protected by screening of a sufficient nature to limit the cultural damage to this heritage site.

5.210

Undoubtedly, the majority of residents of Tudeley Village will travel to Tonbridge to access retail, employment, leisure and onwards travel to London. Most of this travel will be by car. The impact of this travel and influx of non-Tonbridge resident citizens will impact Tonbridge hugely. We understand that Tonbridge and Malling Borough Councillors as well as Tonbridge residents themselves are extremely concerned about the potential effect of this. This will be in addition to the added influx of people from the East Capel and Paddock Wood developments who will also travel to Tonbridge for these activities.

5.211

We do not consider that TWBC have adequately demonstrated "exceptional circumstances" to alter the boundaries of Greenbelt and remove large areas of land from that designation nor do we think that this is fully justified; especially Tudeley Village (183ha) which will destroy the original concept of green belt to prevent urban sprawl.

TWBC's approach to apply "A hierarchical approach to nature conservation and the protection of biodiversity across the sites and habitats of national, regional, and local importance within the borough" with "The objective to achieve net gains for nature and protect and enhance sites of geological interest across the whole borough and where possible to secure the long-term management of sites, areas, and features important for biodiversity and geodiversity" is simple madness in light of their proposal to remove 407 hectares of Greenbelt land from the Parish of Capel.

The concept of "net gains" by enhancing and protecting sites elsewhere is farcical at best and illegal as worst. The land in Tudeley is filled with significant variety of wildlife from birds, to insects, reptiles, amphibians, mammals, trees and flowers that thrive in the land that has been managed in this way for thousands of years. To expect this to be improved and all of this biodiversity to thrive or even move to another site speaks loudly of how poorly TWBC understand or care for the environment. They will

simply destroy these habitats. A lot of the habitats are actually protected bat roosts and badger setts. The wild flowers have protection as do the hedges and trees of nesting birds to name a few. How anything can be built without taking this into account is shocking. However, as we have seen in other developments the destruction of these habitats are of little consequence to the fines levied (should they ever be) against the developers and of course TWBC will likely not provide any enforcement of such wanton and illegal destruction.

5.212

We do not consider TWBC to have fully considered the sustainability of the Tudeley garden settlement

5.213

The highways modelling makes a lot of assumption regarding active transport and residents not actually getting into their cars to shop, to visit friends, to get to other leisure activities and to get to work. Assuming post COVID-19 pandemic, people return in time to commuting to London (which a vast majority of Tonbridge, Tunbridge Wells and Paddock Wood residents do) then the capacity on trains (at full capacity prior to Covid -19) , at Tonbridge and Paddock Wood station car parks has not been fully addressed with the relevant stakeholders. The nearest station to the Tudeley village will be Tonbridge. Tonbridge will expect to receive extra demand on its services that will undoubtedly stretch its resources to un-sustainable proportions.

Access to Tonbridge on the A26 between the B2017 to the Hadlow Road is a bottleneck at rush hours and increasingly during weekdays and including weekends This is due to the Industrial estate in Tonbridge having increased the number of shopping outlets and therefore significant traffic to access the sites has increased. This road as the only access road to Tonbridge from Five Oak Green is also limited by cars parking along it (legally) during working hours. This road is the primary access to the station, shops, schools etc. Any further increase in traffic by the proposed homes will bring the entire area to a standstill.

5.215

Tudeley Village will be geographically so close to the border of Tonbridge and Five Oak Green, which in turn is so close to East Capel and Paddock Wood that there is limited chance of it becoming its own self contained community.

5.217

If the planners of Tudeley village think that residents will walk or cycle to Tunbridge wells for shopping, leisure, visiting friends then they really have a rose tinted view of the hills and distances involved in these activities. We realise that planning for active transport is vital. The provision of safe cycle and pedestrian routes is so important but the planners must be realistic in terms of cycling proficiency, legality of electric scooters and the pannier carrying capacity for the weekly shop for a family of four.

However, using public transport is a non starter as such services are usually subsidised for a period of time, unreliable or infrequent for the times that usage is required. Hence cars will proliferate in the two sites.

5.218

We understand that stopping distances of trains travelling between Tonbridge and Tudeley and Paddock Wood and Tudeley will prevent a station being built at this site. This is an unrealistic planning concept.

Part of the constraints on housing in the south east and specifically the proposed plans under both STR/SS1 and STR/SS3 is the lack of capacity for trains in London – in other words there is no capacity for additional services to be added on the London/Dover line due to lack of terminal space in London stations.

5.219

We understand that there is a minimum requirement in terms of likely footfall and number of houses for the major supermarkets to invest in a new retail site. With Tonbridge , Paddock Wood and Pembury having superstores , it is unlikely that the large supermarket retailers will come to Tudeley – residents will have to shop elsewhere for their weekly shop, meaning more cars on the sites which would likely be at least two per house if not more.

5.220

As can be seen on similar planned sites such as Kingshill in West Malling, the planned facilities do not create local jobs nor create an integrated community. Cars proliferate and workers drive into the offices and workplaces. The jobs in Paddock Wood itself are centred around it being a distribution hub with significant numbers of lorries from the UK and overseas coming in and out on a daily basis. These lorries will use the existing roads as they currently do. Any new warehouses built to create jobs will have the same effect – importing workers by car and greater increases in heavy vehicles and vans across the area. This is not environmentally sound (air quality, noise, pollution, light pollution, litter. Note the parked lorries on public roads in the surrounding streets at current times, plus the litter and toilet waste that is dumped out of the lorries along the road side at these areas etc).

TWBC cannot create jobs. Jobs are created by the economic environment and accessibility for the workers or to their clients. Workers no longer work close to home as desired by TWBC but travel to work by car and park their cars. This is all unplanned with the simplistic view of TWBC by assuming that “many people” can work locally in the shops, workshops, offices, cafes that will be built. They won’t, they will travel to London or work from home for London based firms – the house prices dictate this.

5.223

Clear identity addressed in 5.215 above

5.225

The proposed Five Pak Green bypass will not alleviate the excess traffic congestion which occurs at peak times at the Tonbridge end of the B2017. The two developments at STR/SS1 and STR/SS3 will only add to this already congested junction and onwards into Tonbridge.

The proposed closure of the road bridge over the railway in Paddock Wood (STR 6) , will, if approved, increase almost the entire traffic load from Paddock town and surrounding villages to the south west of Paddock wood, to be diverted into the A228. A heavily loaded road at the current time without additional traffic. The plans expect that bridleways and footpaths cross the entire area as sustainable transport (5.223 6) which without sufficient pedestrian crossings or bridges will significantly increase the risk of accidents and deaths.

5.227 Carbon zero

Construction is one of the most polluting industries both in the production of the materials and the energy consumed to build the houses and infrastructure. Concrete production is one of the worst offenders. The initial carbon emission numbers have not been provided to judge whether anything really will be zero emissions. Low carbon missions are still pollution and with 2060 and 2800 houses

on both sites of STR/SS1 and STR/SS3, roads and infrastructure projects, multiples of “low emissions/pollution” will in aggregate, be significantly more than are produced at the current time.

COP26 Glasgow in 2021 will likely be announcing the need for carbon capture from natural resources to become one of the primary and most important aims in respect of the world's effort to stem rising climate temperatures. The G7 meeting in Cornwall is also likely to say the same thing. Natural assets are carbon absorbing and remove carbon from the atmosphere; low and zero carbon emissions do nothing to remove carbon, but in the latter case, make matters worse.

Ralph Chami of the IMF, the world's leading expert on carbon capture by natural resources has opined on the destruction on the land in both STR/SS1 and STR/SS3 as short sighted and contrary to the objectives that the government will likely be signing to under the Paris Accord. TWBC has not made any analysis of the obligations that the government will likely impose under this Accord regarding natural resource carbon capture and TWBC are blandly and incorrectly appearing to assume that heating and energy supplies can be switched away from gas and existing energy generation to renewable energy sources.

This is a statement being made regarding the preservation and valuation of natural assets e.g. green belt and agricultural land at STR/SS3. The UK Government is expected sign up to this statement either through G7, COP 26 and/or the Paris Accord. It is showing that natural assets have greater value than development value and must be preserved. *"The Committee directs the executive director of the International Monetary Fund (IMF), in consultation with the President of the World Bank, to amass evidence on the economic value of carbon sequestration and related economic benefits for ecosystem services and contributions of living, healthy keystone species, and whole ecosystems, in a portfolio of natural capital assets; to design a system of national accounts for natural capital assets, including a modular framework for governance and stewardship of natural capital assets by local communities; and to support community stewardship and monitoring of natural capital assets that is designed to maintain and increase their local and collective value and sustainability."* This needs to be taken into account.

Heat pumps as one of the alternatives to achieving TWBCs goals of zero and low carbon emissions (ie pollution) are expensive to instal, use enormous lengths of oil derived plastic tubing and bulky. The proposed houses do not have the land for the buried tubing nor will likely have the internal capacity to house the equipment (usually standard garage size). They use a lot of electricity at a time when electric cars are growing in number and consuming a finite source of electricity. Heat pumps react slowly to changing calls for heat and cannot produce water hot enough for spot heat or for a domestic hot water system.

In this part of the UK, to be able to rely on renewable energy, solar farms would require significant battery farms to manage the supply needs when there is no sun. Battery farms do not last long in wet conditions (as Adelaide in Australia has found out). TWBC has not provided any information as to where this renewable energy will come from. There is no information as to where these renewable plants will be located within the area to provide the power required.

Solar power has also required subsidies to ensure that it is economically viable and therefore any such development to be sustainable and carbon free needs subsidies – these have not been factored into the economics of meeting TWBC's stated aim of being low and zero carbon.

TWBC has not given any thought, analysis or consideration to what this actually means and therefore the whole plans for STR/SS1 and STR/SS3 are simply using the pretence of environmental credentials and sustainability as a veneer.

Question 6

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Remove STR/SS3 from the local plan.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lynne Assirati [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lynne Assirati [REDACTED]
Comment ID	PSLP_270
Response Date	29/05/21 16:56
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Lynne Assirati
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am objecting to Policy STR/SS 3 because I believe it is inconsistent with TWBC policies STR 5 (Infrastructure and Connectivity), STR 6 (Transport and Parking), STR 7 (Climate Change), STR 8 (Conserving and Enhancing the Natural Built and Historic Environment), STR 9 Green Belt and EN 25 (Flood Risk).

My name is Lynne Assirati and I live in Alders Road, Capel which has flooded on a number of occasions, most recently in February 2020 which took a year to recover from. Together with my husband and neighbours we run the Capel Path Rangers group which was set up to ensure that all the footpaths within the parish are well maintained and I greatly appreciate being able to walk in such lovely countryside with outstanding views. We also run the Friends of Capel Church which is dedicated to maintaining the fabric of this ancient church and welcoming the many thousands of visitors who come to view our medieval wall paintings. Finally, I organise the village litter picks. I am therefore writing to object to "The Strategy for Tudeley Village" (Policy STR/SS 3) for a number of reasons but primarily because it will increase flood risk, will ruin a huge swathe of our beautiful countryside, and the proposed new road will increase noise pollution and destroy the peace and tranquillity of our lovely church yard which is much used by many locals for a place to come for a few quiet moments away from the bustle and business of our frantic lives. Increased pollution will damage the fabric of the building and thousands more people living in this area will increase litter to a disastrous level. We already get very little support from TWBC to keep our lanes clean and I don't anticipate there will a change in policy any time soon.

Creating a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. There will be a significant increase in traffic in to Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every day especially at peak times.

It is naive to believe that the people who will buy these houses will already be living locally. Many, many will come from London seizing the opportunity to get a larger house for the same money and have access to grammar schools. People living in Tudeley New Town will therefore use Tonbridge Station for commuting and Tonbridge town services and that will require more parking. The increase in traffic will be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period. It may be the case that more people will work from home for part of the week but we should be in no doubt that the pressure on the roads, the trains and car parking will still increase and this pressure is already at an unsustainable level. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in

the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer. We understand that Tonbridge councillors are unhappy about the TWBC proposals and there is not as yet a statement of common ground between the authorities as required by the NPPF.

There will of course be impact on Tunbridge Wells where there will be even longer queues at A&E, increased pressure on the police service, more accidents on the inadequate roads.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary into Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows). Here again, the peace and tranquillity of this very special place will be destroyed and increased pollution will cause irreparable harm. This is a Grade 1 listed building and I would remind you that as such Historic England regards the setting as extremely important.

The garden settlement at Tudeley can never be one settlement as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food. Indeed, with the latest statistics on climate change it is imperative that we preserve and use every acre of agricultural land including the orchards for which this area is so famous. We need to become self-sufficient.

I believe that housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. TWBC is already providing more than their housing need figure in the draft Local Plan. TWBC has taken the housing need figure of 13,560 given to them by government and upscaled it to 14,776 despite having strong grounds to lower it due to the large amount of Green Belt and AONB land in the borough. Taking 1,216 (the upscale) from the 2,800 planned for Tudeley and then asking the government to allow the housing need to fall by 1,584 to factor in the lack of "exceptional circumstances" for building on Green Belt land, would be a much better approach. Recent ONS figures show that population growth in the borough is slowing, making this proposed approach honest and relevant. I repeat the only exceptional circumstances are that most of the borough is in an area of Outstanding Natural Beauty or is designated Metropolitan Green Belt and as such the government accepts that housing needs can be curtailed. One can only wonder what is the motive for TWBC to persist in going ahead with this very unpopular scheme when they so obviously don't need to?

Earlier in the plan (in 4.40) they refer to Tudeley Village securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that they intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans. I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge.

It is significant that there was an overwhelming rejection of the plan at Reg 18, but none of the objections made have been recognised by TWBC, and no changes to the plans for Capel have been made in

Reg 19, except to increase the number of houses proposed. This is not local democracy, and shows that the Council are determined to push through their plan against the wishes of the local population.

Question 6

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I believe that Tudeley Village (SS 3) should be removed from the plan, and TWBC should use more brownfield sites and empty retail space for housing and if necessary explain that it cannot meet the governments indicative targets due to the Green Belt constraints.

In the Daily Telegraph of 14th October, 2019, the housing minister said she would support the building of garden villages on Green Belt Land only if there is support from the local community. There is no support for this garden village. In the same newspaper the head of the CPRE said that building on Green Belt land is not solving the need for homes because the wrong sort of homes are being built. What is needed is true low cost homes for those who are currently truly homeless – the people who are living on the streets and in hostels as identified by the Heriot Watt survey of 2014 and young people in general who are forced to continue to live with their parents who cannot afford to rent or buy the small number of so-called low cost homes that it is proposed to build here and they certainly don't want to be living miles away from the town centres. So, forcing every new housing development to build a few low cost houses or flats doesn't solve anything. What will help is converting empty shops in the centre of our towns into residences and will revive our high streets as well. And after this pandemic is finally brought under control, there will be plenty of empty shops in all our local towns. In Europe every medium and large town has built blocks of flats no more than 10 storeys high, often in the centre, which is exactly the sort of accommodation that meets these people's needs and has managed to blend them in so well that you hardly notice them. There are plenty of brown field sites in Tunbridge Wells, Maidstone etc. where this would work well. There is also an alternative site at Castle Hill, still within our parish and regrettably within an AONB but because of the nearby industrial estate and the busy A21, which would actually blend in much better with its current surroundings and impact on no-one. Build here and no-one will flood, no precious agricultural land will be destroyed and no new roads will be needed.

Since his election in 2019, our Prime Minister has stated publicly more than once that it is a major aim of this government to eradicate the north/south divide and create a more equal society. In order to achieve this, businesses must be encouraged to move to other parts of our country, away from the south-east. If this is truly the desire of our government they will offer incentives to both businesses and citizens and then people will follow the jobs. The pandemic has demonstrated that people can work from home anywhere. How long before these homes are left standing empty as people move to areas where housing is cheaper, there are plentiful jobs and there are still the green spaces so important for their health that we will have been deprived of?

My husband and I, and my neighbours have chosen to give up the benefits of living in a town with all its various amenities, good phone connections, easy access to shops, transport links etc. in favour of living somewhere we can breathe clean air, enjoy the changing seasons and the lack of crime. We work hard to protect our environment for future generations and put up with the fact that we don't get value for money from our council tax but have pot holes that are not filled in, litter mounting at the side of the road etc. If you impose thousands of people on us, all that will be lost.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Comment

Consultee	Robert Assirati [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Robert Assirati [REDACTED]
Comment ID	PSLP_273
Response Date	29/05/21 15:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Robert Assirati CBE
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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POLICY STR/SS 3

I am writing to object to “The Strategy for Tudeley Village” (Policy STR/SS 3).

I am a retired civil servant living in the Parish of Capel. I spent my career managing and reviewing major government projects, working latterly for the Cabinet Office and HM Treasury. I was Deputy President of the British Computer Society and an Honorary Fellow of the Association for Project Management. I am still invited by the Government to review their Major Projects for deliverability and value for money several times a year.

Locally I chair the Capel Path Rangers who look after local rights of way, and also chair the Friends of Capel Church. I am a Trustee of Registered Charity 1192171 Capel Greenbelt Protection Society which seeks to protect and improve the local countryside and help local people make use of and enjoy it.

I chose to live in this area because of its rural nature, with beautiful views over the Medway valley and opportunities for walking the network of footpaths and the towpath along the River Medway. I took account of the fact that my house is in both the Metropolitan Green Belt and an Area of Outstanding Natural Beauty and regarded this as a guarantee by government policy that I would not be subject to uncontrolled development. How wrong I was.

It is clear that Government Regional Strategy is non-existent. On the one hand, they claim to want to rebalance the economy by re-invigorating the Midlands and North, and to provide better infrastructure there through rail links etc. But they bow to pressure to take a London-led approach, further increasing the pressures on the South East and forcing land and house prices ever higher.

I am opposed to building on Green Belt unless there are exceptional circumstances, which I understand is still government policy if not TWBC's. I do not believe there are any exceptional circumstances for either SS1 or SS3. Other options have been identified, and little effort has been made to identify brownfield sites in the Borough. I feel that the current plan benefits developers and landowners rather than the residents of Tunbridge Wells. In particular, evidence from other developments shows that it is unlikely that this will provide truly affordable housing in any quantity at all. I have just returned from France where just about every town and city is surrounded by apartment blocks (five to ten stories) which are the most economical way, in terms of both cost and land use, of providing housing for those who cannot afford a stand alone property or choose not to spend the majority of their income on housing. I know that TWBC approved a large apartment block at the Pantiles, in the heart of the historic centre, with no affordable element at all, and would not be surprised if this happens on the old cinema site as well.

Creating a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. Similar developments have found few purchasers

from the local area and have been offering incentives for people to move out of London and commute back in. It is clear that the majority of purchasers will be commuters. The effect of several thousand extra commuters trying to get in to Tonbridge in the rush hours, trying to park and trying to get on to already over-crowded trains will be paralysing even if the extra commuters are partly offset by an increase in home working. I understand from Network Rail that there is very little scope to increase capacity in peak hours – a few trains could be extended to 12 coaches – until the line has been fully upgraded to digital signalling which is decades away.

It is also clear that the additional infrastructure, if it happens, will be too late. We have been told that the earliest date for the Colts Hill Bypass is 2028, while at least 1500 of the houses at SS 3 will be built by 2026. And the proposed link road from Tudeley to the A228 will until then have nowhere to go. So it is clear that for many years the local roads and communities will have to live with construction traffic and thousands of extra residents with no significant road infrastructure improvements.

The SS 3 site is positioned on good agricultural land in the Green Belt, but more importantly it lies on the southern slopes of the Medway Valley. As well as the effect on the landscape as seen from the South, there will be a huge effect on views from the Northern slopes, around Mereworth, Watlingbury and Yalding for example. From there the Tudeley New Town will be a blot on an attractive rural landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets. All Saints Church at Tudeley (Grade 1 listed) will end up being surrounded by houses and bus lanes and sit next to a busy road in sight and hearing of a big roundabout. That will cause great harm to its value as a tourist attractions and a heritage asset of world renown (due to the complete set of Marc Chagall windows). If it really is necessary to build on the Green Belt, it would be better to build where the landscape is not scarred for miles around. The proposed site at Castle Hill, although AONB, would do much less damage to the landscape.

The garden settlement at Tudeley can never be one settlement as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles. Government policy on Garden Villages states that the developments should involve and have the support of the local communities. There is no local support at all for development at SS 3.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food. The proposed developments will build over seven of the well used footpaths in the Parish (WT 161, 162, 165, 175, 176, 179 and 180) and affect the view from many others – although the rights of way may be maintained, they will involve walking through housing estates rather than fields and woods. Nine of the planned walks in Capel Path Rangers' "15 Walks around Capel" will be directly affected. The Plan will have a devastating effect on those people who use these walks regularly,

I also object to the fact that SS 3 was not included in the 2017 Issues and Options exercise and related consultation, which made it clear that any stand alone development was favoured by a minority of people. 60% of respondents voted for development in the A21 corridor but this was rejected by the Council. There was no opportunity to comment on any proposals for West Capel.

Question 6

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or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I believe that Tudeley Village (SS 3) should be removed from the plan, and TWBC should use more brownfield sites and empty retail space for housing and if necessary explain that it cannot meet the Government's indicative targets due to the Green Belt constraints.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr G Ayers [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr G Ayers [REDACTED]
Comment ID	PSLP_226
Response Date	19/05/21 12:00
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mr G Ayers
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 1 The Development Strategy

Policies PSTR/SS1, PSTR/SS3 & PSTR/BM1

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

.	It is not effective
.	It is not justified

Question 5

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Section 5 – comments

The comments below focus on the integrity and how sound the Local Plan (LP) has been assembled, having regard to its overall deliverability. In affect, not necessarily questioning its constitute parts (although some of these inevitably come into question - notably the sheer scale of new housing projected without corresponding highways infrastructure improvements) but how sound the thinking has been applied to knitting these together to achieve the overall strategic outcome for the Borough? In so doing, this is not merely looking at the results at the very end of the Plan Period after some 15 years but critically :-

i) at the very dawn of implementation in 2022 and

ii) followed closely in the formative years of its implementation (circa 2022 - 2028) when in stark contrast, unparalleled numbers of new homes (Expected Completions within Plan Period table) are being planned and yet highway infrastructure, classified as 'critical' by TWBC themselves, necessary to unlock the housing development, is worryingly not implemented until beyond year 10 into the overall 15 year plan period thereby leading to:-

- 1 increased volume of residents in the Borough which in turn multiples car usage exacerbating congestion, &
- 2 as a consequence, a reduction in air quality; &
- 3 a detrimental impact on the environment and residents well being in those parts of the Borough most effected during the transition phase.

Whilst recognising pressures and concerns by residents elsewhere in the Borough, the comments below focus on the impact locally to the Parish of Brenchley and Matfield even though many of the problems to be encountered arise outside of the immediate vicinity of the two villages.

There are three key areas to consider - housing, highway infrastructure and air quality. The thrust of the problem is that at no stage in the Local Plan, does it appear that deliverability has been baselined against existing conditions? For example, have the key highway routes to unlock the 'sustainable' housing developments been modelled against *origin & destination* traffic criteria to establish the extent of spare capacity on the **existing** highway network?

Further, to what extent has TWBC demonstrated how deliverable the Local Plan is under scrutiny? particularly at the interplay between the sizeable local housing development along with the A21 and A228 infrastructure improvements required to unlock them?

It is evident sections of the LP have been 'reviewed' individually but less apparent is the extent to which TWBC has undertaken due diligence and executive scrutiny to the critical path weaving its way through spine of the Local Plan? Without a CPA (Critical Path Analysis) or simple bar chart, it is impossible to form a view as to how deliverable or robust the LP is in this sense? Not the minutiae or stand alone

subjects but the big bite sized bits of the Local Plan that have undeniable strategic links and dependencies with each other.

One of the tests for soundness within NPPF (National Planning Policy Framework) is whether the Local Plan is Justified, or not. To support this an acceptable LP should contain " ... *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*"

I cannot claim to have read every section of the Local Plan but I am convinced that there is little to no evidence that supports the the LP is based upon proportionate evidence. Similarly, I have no feeling studying the LP, that the strategies adopted are underpinned by any number of various alternatives options. Surely if such alternative scenarios had been interrogated and contrasted in the LP, it would illustrate the current version as the preferred option.

Moving from generic commentary to specifics, my doubt to the soundness of the LP looks at the strategic interplay between the three subject groups below and the impact specifically on Brenchley and Matfield Parish (BAMP) along with nearby Paddock Wood:-

- . The order of magnitude increase in new housing for Paddock Wood, Capel Garden Village and BAMP, generating more traffic leading to congestion and lower air quality on 82160 running through Matfield; and
- . The impact of extra traffic through Matfield until such time as Highways England acquire ring fenced funding for the £1.5m in their 10 year capital programme to implement the enhanced A21 highway & roundabout modelling planned at Kipping Cross and Blue Boys; plus
- . The impact of extra traffic through Matfield (and surrounding village / rural areas) until such time in the future financial contributions from housing developers (via S106, CIL etc) achieve the £20 million necessary to fund the new A228 Colts Hill bypass works.

Item

Hazard

Risk

Consequence

Increased housing and number of residents at Capel Village, Paddock Wood and Matfield

Extra residential car journeys made by new residents within the Boroughs hotspots and extra HGV's continuing to use B2160 & avoid the dedicated HGV A228 route to join A21

1) additional vehicle trips heading to & from A21 Kipping Cross

2) HGV's continuing to avoid designated HGV route up A228 Colts Hill due to congestion at and poor junction configuration to join the A21

1) Vehicular congestion backing up from Kipping Cross into Matfield village, especially during summer and peak times of the day

2) Additional vehicle traffic and HGV's using B2160 through Matfield village

3) lowering of air quality 4) lowering of residents wellbeing, health and increased journey times.

For the first 6 years, the Boroughs' housing projections (Expected Completions Within Plan Period - Housing Supply and Trajectory Topic Paper for the Pre-Submission) are at the highest level across the whole of the Plan Period to 2038. Yet, the highway infrastructure deemed critical (Infrastructure Delivery Plan) by TWBC themselves to address 1) existing baseline transport problems and 2) unlock the spatial needs for projected housing targets " does not reach even the feasibility/ planning stage until at least year 10 of the 15 year programme (10 years for A21 and beyond year 10 for A228 Colts Hill bypass).Q - what happens to transport congestion, environment, air quality and residents health during the first 10 years of the Local Plan when this critical highway infrastructure is not available?

Q - do the contributions and improvements made in latter years exceed the detrimental impact upon residents wellbeing in the first 10 years?

Under Section 3:Vision and Objectives the following statements are made by TWBC :-

Vision - "general concerns about the infrastructure capacity " ...

Vision and Strategic Objectives 1 - Vision " and supporting infrastructure will be **achieved over the plan period** (this claim reinforces a lack of deliverability during the plan period.) " and under Local ambitions: for Paddock Wood with timely infrastructure provision'

Vision and Strategic Objectives 2 - " To achieve the timely delivery of all forms of infrastructure that meets the needs of development... .. "

How and **when** the Local Plan assures residents these bold claims are supportable not clear, especially when housing is forging ahead in the early years and hard infrastructure doesn't emerge until 2/3rds of the plan period has passed.

Question 6

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Section 6 - Recommendations for update to Local Plan

Scale and rate of additional housing plus realisation of A21 and A228 highway improvements

Recommendation 1 - Housing development

- . explore to what extent the volume of new housing developments between 2022 and 2028 can be skewed to later in the plan period until such time as A21 and A228 highway improvements are realised.
- . Tailor housing development projections to meet existing A21 and A228 highway capacity until future improvements of A21 and A228 fully funded and implemented.

Recommendation 2 - Traffic modelling

- . using traffic modelling against housing projections and locations, quantify the existing spare highway capacity available on A21 (Kipping Cross and Blue Boys) and A228 to establish if the extra generated journeys made by new residents (in formative LP years) are tenable, or not.
- . enforce dedicated HGV routes to service new housing development sites
- . Undertake HGV traffic study at junction of B2017 and A228 to establish why, as the KCC preferred HGV route, instead of continuing up Colts Hill A228, HGV lorries divert through Matfield along B2160 to join A21.

Recommendation 3 - Highway Infrastructure

- . Notwithstanding LP safeguarding, explore alternative measures to secure gap funding (reference is made within the LP) A21 & A228 improvements in order to pull forward and thereby retain existing LP year housing projections in the early years 2021 - 2031.
- . Ensure A264 Pembury junction **and** A228 Colts Hill bypass improvements are dealt with holistically as one overall highway improvement solution.
- . Explore traffic calming technology and improved pedestrian safety in Brenchley and Matfield villages.

Recommendation 4 - Air quality

- . adopt air quality monitoring points between 1) The Star and The Poet on B2160 Matfield, 2) A21 Kipping Cross and 3) Eldon Way and Rosemary PI B2160 at Paddock Wood.

Recommendation 5 - National Planning Policy Framework

- . Along with any supporting evidence trail, highlight to what alternative scenarios have been considered in drafting the LP and methodology employed leading to the option selected in the current version of the Local Plan.

- . Demonstrate how TWBC have assessed the Local Plan as 'deliverable' , what they identify as tier 1 unavoidable adverse impacts to residents, businesses and visitors and the mitigation measures (or compensatory measures) to be adopted.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Zerina Bagwell [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Zerina Bagwell [REDACTED]
Comment ID	PSLP_1108
Response Date	03/06/21 15:01
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation	Zerina Bagwell
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 - Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Dear Inspector

I am writing to object to “The Strategy for Tudeley Village” (Policy STR/SS 3).

We moved to Tudeley in 2016 because we simply fell in love with the Parish. We previously lived in Sevenoaks but wanted to move a bit further out to the countryside within easy reach of a train station to London for work. Tudeley offered us both options as well as a good selection of secondary schools. We were right on the border of Tonbridge which meant that we were close to the amenities that a town offered. We consider Tonbridge as our local town because it can take up to 40 minutes by car to travel to the centre of Tunbridge Wells. In addition, Tudeley offered a piece of the beautiful English countryside. Wherever you looked, the agricultural land was being used to its full potential. It wasn't just left as something to look at, but it provided food as well as jobs. Surely, we had found a piece of heaven?! When people came to visit, they all exclaimed that they wished they lived in Tudeley! When we heard the news of the Local Plan and the proposed garden town at Tudeley, we were quite honestly heartbroken. However, what was more serious and important was the lack of consideration for the agricultural, environmental and infrastructure impact that the Local Plan would have on the Parish. There is a lack of clear evidence in the Local Plan that suggests other more appropriate sites (such as brown fields along the A21) had been thoroughly considered.

First of all, TWBC has 20 wards. TWBC want to put more than 50% of all their new housing in just 1 ward: Capel which already borders the very congested and busy town of Tonbridge. Two thousand four hundred and fifty-two (2,452) people currently live in Capel and with the local plan this will increase to 13,700 people within the same area. This is such a disproportionate rise of 500+% - a totally irrational and unrealistic increase in such a small area.

Creating a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to both the residents of the Parish of Capel and to residents of Tonbridge as well as to the landscape. Tudeley is located right on the edge of the large bustling town of Tonbridge. In addition, there is quite simply not enough physical space/land in Tudeley to put the aforementioned 2,800 houses. The Local Plan for this policy is unsustainable, unrealistic and short sighted. First of all, Tudeley is a very small village with one country road running through it. Hartlake Road is used as a short cut from North Tonbridge to the A21 and it is very popular. The proposal to close the Hartlake Road to through traffic is farcical and naïve.

The garden settlement at Tudeley would make traffic movements in Tonbridge unsustainable. There will be a significant increase in traffic into Tonbridge from the B2017, which will increase the extreme traffic congestion that already exists on this road every morning. We have to leave our house by 08:00 for the school run in order to get my son to school for 08:30 in Hildenborough. There is already unacceptable levels of traffic during peak hours from Tudeley Lane to Woodgate Way, Vale Road and Pembury Road. In addition, the Local Plan proposes 15 years plus of large construction sites and vehicles in Capel on the already congested existing infrastructure. The Kent Mineral Plan at Stonecastle and Moat Farm is already progressing which the entire area will already be subjected to 80+ trucks a day for a very long period of time! In conclusion, even if the current infrastructure is improved by the

Local Plan, it will only add to the traffic problems due and will not relieve the congestion. It is simply not feasible.

People living in Tudeley will use Tonbridge Station for commuting and Tonbridge town services that will need more parking. The increase in traffic will be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. I believe it is unrealistic and naive for the Local Plan to rely on bicycles as being the primary and most suitable mode of transport for the residents in Tudeley. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but it is without a doubt that flood risks will increase. Covering agricultural fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. At the moment, the Medway River already rises when there is substantial rainfall. I know this for a fact because I frequently walk my dogs along the Medway River and there have been numerous times when the river has flooded onto the road at the bridge on Hartlake Road towards Golden Green. We have even had to subscribe to the flood alert service because the flooding Tudeley has become more frequent over the last couple of years.

The heritage of the All Saints Church at Tudeley must be preserved. What a wonderful piece of history that is set in the middle of a breath-taking landscape. According to the Local Plan, it will end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows). You will be surprised, as I was, that the church is actually well known in the art community around the world!

The garden settlement at Tudeley can never be one settlement as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles. Sherenden Road is a single-track road that runs in front of my house from the south to the north of Tudeley. There is no mention in the Local Plan how this road will be used – am I to expect at least 2,800 cars to pass by my front door on a single track every day? Again, any proposed infrastructure for Tudeley will be unsustainable given the size of the current roads and existing surrounding houses.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food. The loss of agricultural land that is currently being used by Scripps Farm is heart breaking. Did you know that you can buy apples in Tesco's that have been grown in the fields along Sherenden Road? The Scripps Farm is the biggest producer of fruit in Kent, which is something we should be proud of and not want to destroy!

I believe that the housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. TWBC is already providing more than their housing need figure in the Local Plan. TWBC has taken the housing need figure of 13,560 given to them by government and upscaled it to 14,776 despite having strong grounds to lower it due to the large amount of Green Belt and AONB land in the borough. Taking 1,216 (the upscale) from the 2,800 planned for Tudeley and then asking the government to allow the housing need to fall by 1,584 to factor in the lack of "exceptional circumstances" for building on Green Belt land, would be a much better approach. Recent ONS figures show that population growth in the borough is slowing, making this proposed approach honest and relevant.

The plan preparation process didn't include Tudeley (sites CA1 and CA2) until after the Issues and Options Process in 2017. This means that the largest housing area in the plan didn't go through most of the plan preparation process. There is no detailed Green Belt Study for these sites, no Landscape Assessment, no Biodiversity Assessment. I think that this revised version of the Local Plan does not even to begin to address the issues raised by the residents during the Regulation 18 Consultation.

97% of the residents opposed the Plan and highlighted the problems in great detail. The Issues and Options process led to most people (60%) wanting a growth corridor led approach. Less than half wanted a garden settlement and that was when they didn't know the garden settlement would involve destruction of Green Belt. Protecting Green Belt was a key priority for people who participated in the Issues and Options consultation. I understand that in response to the Site Allocation Plan in 2016, the Inspector said "I do not accept a need to allocate any land currently in the Green Belt... I have not recommended that any land within the Green Belt should be allocated".

Earlier in the plan (in 4.40) you refer to Tudeley Village securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that you intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans. I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge.

I urge you to seriously consider the above points and the adverse effect that the Local Plan will have on the current infrastructure in Tudeley and the surrounding areas of Tonbridge. The Local Plan for Tudeley is clearly (and beyond any doubt) unsustainable. The development of this scale will have an unacceptable high impact on the centre of Tonbridge, and it is highly impossible for the above issues to be mitigated properly. Having read the published documents, I feel that the Local Plan has targeted Tudeley because it is simply the easiest option. However, it just does not make any logical or rational sense on so many levels which extend beyond what I have written above. Just because it is an easy option (one landowner/developer) does not make it the right one.

Yours sincerely,

Zerina Bagwell

Question 6

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It is clear from the Local Plan that alternative sites which are far more feasible and realistic in terms of implementation, have not been given enough consideration. These sites have not been looked at in details and evidence clearly shows that alternative have not truly been considered as alternatives.

These sites are: Castle Hill and Blantyre along the A21 corridor - perfect locations. In addition, there are a large number of vacant offices in Tunbridges Wells on large empty sites that can be considered for development. For example, the AXA building.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Comment

Consultee	Elisabeth Baker [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Elisabeth Baker [REDACTED]
Comment ID	PSLP_1071
Response Date	03/06/21 12:46
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Elisabeth Baker
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in the same house in Paddock Wood for 45 years. It used to be a beautiful and useful town. The fields and countryside were lovely and it felt very rural; now the entire town is a mass of developments. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy.

As the town expands the current flooding will only get worse as trees, hedges and drainage ditches are removed or replaced by housing estates. Traffic is terrible, particularly during rush hours and school drop-off/collection times. Tudeley is a small village; it doesn't have the schools, shops, doctors or road infrastructure to be able to take on anything like this size of over-development. It will ruin the current village. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Linda Barretto [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Linda Barretto [REDACTED]
Comment ID	PSLP_36
Response Date	14/04/21 19:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Nigel Barretto
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Plan is not prepares in the interest of local people ,it does not take the local Enviornment into consideration. no consideration to the increase of traffic ,the condition of the local roads and Hamlets which will be used as Rat-runs.

The amount of proposed builds is not justified , as it will not be affordable to people that live local ,it is designed as an overflow for people from London .Currently there are New houses within Caple that are not sold and remain empty.

The amount of properties do not meet the current govement calculations for housing that may be built.

Question 6

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The site of the planned is not suitable as stated in Q5.

The ideal site would be at the Castle hill site which has all the advantages of location,traffic access and close to amenities like the Retail park and a direct access to the A21 could be made people that work either towards or in the M25 boundry also people that work towards the Coast.

to enable people that do move into any new settlement to live an exprience of country live as stated in documentations proposed,there should be a maximin of 100 dwellings in each settlement.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To put my views across to support the rejections of building on the proposed Tudley site and for the reduction of dwellings built.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The plans to build on the proposed Tudley site should be rejected.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Linda Barretto [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Linda Barretto [REDACTED]
Comment ID	PSLP_35
Response Date	14/04/21 20:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4

Question 1

Respondent's Name and/or Organisation	Linda Barretto
---------------------------------------	----------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
----------------------	----

Is sound	No
----------	----

Complies with the Duty to Cooperate	No
-------------------------------------	----

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Plan is not prepares in the interest of local people ,it does not take the local Enviornment into consideration. no consideration to the increase of traffic ,the condition of the local roads and Hamlets which will be used as Rat-runs.

The amount of proposed builds is not justified , as it will not be affordable to people that live local ,it is designed as an overflow for people from London .Currently there are New houses within Caple that are not sold and remain empty.

The amount of properties do not meet the current govement calculations for housing that may be built.

Question 6

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The site of the planned is not suitable as stated in Q5.

The ideal site would be at the Castle hill site which has all the advantages of location,traffic access and close to amenities like the Retail park and a direct access to the A21 could be made people that work either towards or in the M25 boundry also people that work towards the Coast.

to enable people that do move into any new settlement to live an exprience of country live as stated in documentations proposed,there should be a maximin of 100 dwellings in each settlement.

Question 7

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Question 7a

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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

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Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_90

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Berkeley Strategic Land Ltd
Address	Berkeley House 19 Portsmouth Road COBHAM KT11 1JG
Event Name	Pre-Submission Local Plan
Comment by	Berkeley Strategic Land Ltd ([REDACTED])
Comment ID	PSLP_1681
Response Date	04/06/21 11:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1678-1682 Berkeley Strategic Land Ltd. Representation Redacted.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Berkeley Strategic Land Ltd
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	Policy STR/SS 3 The Strategy for Tudeley Village
Question 4	

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

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Question 5

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Please refer to paragraphs 4.1 – 4.12 of the attached representations.

[TWBC: for full representation with appendices, please see supporting documents]

4.0 Place Shaping Policies

4.1 As referred to above, Berkeley objects to the distribution of growth within the Borough, in which development should be focused on the most sustainable settlements within the Borough such as Tunbridge Wells and Cranbrook.

4.2 The Housing Supply and Trajectory Topic Paper (February 2021) which forms evidence as part of the consultation states that both Tudeley Village and Paddock Wood are anticipated to deliver first completions as early as 2025/26 with a total of 3,540 dwellings at Paddock Wood and East Capel and 2,100 dwellings at Tudeley Village being delivered within the Plan period up to 2038.

4.3 However, Berkeley anticipates that the Council's assumptions for delivery on both of these strategic sites at Policy STR/SS 1 and STR1/SS 3 are particularly ambitious given the likely lead in times for sites at this scale. The Lichfields report 'Start to finish' (February, 2020) highlights the major lead in times associated with large strategic sites, in which the average time from validation of the first planning application to the first dwellings being completed on schemes of 2,000+ dwellings takes 8.4 years. The report also states that the annual average build-out rate for schemes of 2,000+ dwellings is 160 dwellings per annum.

4.4 Based on Lichfields analysis that schemes for 2,000+ dwellings can take up to 8.4 years to deliver from the submission of a planning application, Berkeley has formulated a revised timetable for delivery at these strategic sites.

[TWBC: for table, please see supporting documents]

4.5 This will mean that the allocations at Tudeley Village and Paddock Wood will only be able to deliver up to 6 years' worth of housing supply within the Plan period. Based on the Council's projected completions for these allocations, this amounts to circa. 900 dwellings at Tudeley Village and 1,800 dwellings at Paddock Wood, totalling the delivery of just 2,700 dwellings within the Plan period and a shortfall of 2,940 dwellings.

4.6 In addition, if we apply Lichfield's assessment of average delivery rates, Paddock Wood and East Capel will only be able to deliver up 160 dwellings per annum, this means that this allocation will only be capable of delivering circa. 960 dwellings up to 2038.

4.7 In addition, if we assume that Tudeley Village will deliver at the delivery rate set out within the Council's housing trajectory from 2032/33 to 2034/35 at 150 dwellings per annum and apply Lichfield's assessment of average delivery rates from 2035/36 to 2038, this means that the allocation will deliver only 930 dwellings within the plan period.

4.8 Therefore, the total delivery of these strategic sites combined would amount to 1,890 dwellings within the Plan period and a shortfall of 3,750 dwellings.

4.9 Therefore, the Council's housing trajectory for delivery at these strategic sites seems significantly unrealistic given an anticipated annual delivery rate of 300 dwellings per annum at Paddock Wood and East Capel and 200 dwellings per annum at Tudeley Village.

4.10 As such, if projected first completions at Tudeley Village and Paddock Wood, including land at East Capel start from 2032/33, this will mean that the Council can anticipate a shortfall of between 2,490 dwellings – 3,750 dwellings within the Plan period.

4.11 As referenced at Policy STR/SS 1, there are a number of factors that will impact upon the delivery of both Paddock Wood and Tudeley Village. The policy notes that the possible CPO of land at Paddock Wood may be required, in addition to the creation of an SPD, the fact that both allocations will require significant input from multiple landownerships and rate of delivery will depend on market absorption rates.

4.12 Therefore, Berkeley objects to the level of growth planned for at Policy STR/SS 3 Tudeley Village and Policy STR/SS 1 at Paddock Wood, including land at east Capel which in Berkeley's view, justifies that the Plan is not sound as it is not justified nor is it effective as set out by paragraph 35 of the NPPF.

Question 6

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Please refer to paragraphs 4.1 – 4.12 of the attached representations.

[TWBC: for full representation with appendices, please see supporting documents]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to paragraphs 4.1 – 4.12 of the attached representations.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please refer to paragraphs 7.1 – 7.14 of the attached representations.

7.0 Sustainability Appraisal

7.1 The Council's SHELAA site assessment has been supported by an updated SA, included as part of the Regulation 19 consultation.

7.2 The Council's assessment of Tutty's Farm remains unchanged from the previous 2019 SA, however the Council has included additional constraints to development within the SHELAA.

7.3 Berkeley would like to refer the Council to the technical work undertaken in support of the SHELAA submission which has been provided to the Council. This work demonstrates that development will be located outside the area of ancient woodland and the Local Wildlife Site which will be sensitively located to limit potential harm to the AONB.

7.4 Berkeley has provided a re-appraisal of the Council's SA assessment which rescores the site in response to the technical work undertaken to date.

[TWBC: for tables, please see full representation attached as a supporting document]

Biodiversity

7.5 Berkeley commits to providing a net biodiversity gain on all new developments. The masterplan has been designed to be landscape-led through enhanced planting and management of significant landscape features within the site.

7.6 On this basis we consider that the site would have no negative impacts on biodiversity and therefore a positive scoring against this SA objective has been applied.

Heritage & Landscape

7.7 Within the SA, the Council's negative heritage and landscape score has been informed by the likely impact on the settlement edge and landscape setting of Tunbridge Wells.

7.8 The 2021 SHELAA assessment is contradictory, whereby the site is referred to as being "adjacent to the LBD of RTW" and has later been discounted as a suitable site for allocation due to being "outside of the LBD". However, the Council's 2019 SHELAA assessment of the site notes that Tutty's Farm would form a "logical extension to the existing allocation adjacent to the site" which adjoins the built up settlement edge of RTW.

7.9 Therefore, the proposed development would be consistent with the existing character and form of RTW and the neighbouring allocation at Hawkenbury Farm and would not cause a negative impact on the settlement edge of RTW.

7.10 As specified at paragraph 5.5 of this submission, the site is well enclosed by vegetation on its northern, eastern and southern boundaries, providing a strong defensible boundary within the landscape setting of Tunbridge Wells.

7.11 Therefore, to reflect the above, the heritage and landscape SA objective scores have been amended to neutral.

Land Use

7.12 Tutty's Farm has an agricultural land classification of Grade 3 which has informed the Council's negative score for land use.

7.13 However, the positive social impacts of the proposed development in the form of a new purpose-built community building, affordable housing for local people and provision of a variety of natural green spaces would constitute a lower negative scoring of the site against this SA Objective.

7.14 Therefore, the land use SA scoring has been adjusted to a single negative to reflect this.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1678-1682 Berkeley Strategic Land Ltd. Representation Redacted.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Adrienne Bishop [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Adrienne Bishop [REDACTED]
Comment ID	PSLP_39
Response Date	15/04/21 14:57
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3

Data inputter to enter their initials here KJ

Question 1

Respondent's Name and/or Organisation Mrs Adrienne Bishop

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3: The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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The village of Five Oak Green is the largest of the settlements within the parish of Capel with 950 houses.

If the development at Tudeley goes ahead, the percentage increase will be astronomical.

The land on which this development is proposed is good grade agricultural land and we must, as a country, be more self sufficient by growing more produce locally.

The land on which this development is proposed is flood plain and the last few winters have seen this land under 18 inches of water. This has been caused not only by sheer volume of rain falling on the land but also the River Medway and local streams breaking their banks. No amount of drainage from houses will offset the damage floodwater will do.

The land in question is green belt.

If this development goes ahead the pressure on Tonbridge will be immense. Council tax payments will be going to Tunbridge Wells Borough Council but the impact of this development will be felt within Tonbridge and Malling Borough Council.

Residents of this new development will be using the B2017 which is already congested.

Unless central government and national agencies can commit to funding for schools and health centres etc there will be no point in stating that schools and health centres will be part of the scheme.

For office use only

New Site Submission? Enter site address

It is understood that Tonbridge and Malling Borough Council along with other parish councils in the area, all of which will be impacted by this proposal, have not had their input considered. It is understood that a consortium has suggested land at Castle Hill as an alternative to the proposed developments within the parish of Capel. This land, whilst being part of the AONB, is situated by the A21 "corridor" thus giving quick access to both London and the coast without impinging on the local community.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

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Comment

Consultee	Rev Roger Bishop [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rev Roger Bishop [REDACTED]
Comment ID	PSLP_43
Response Date	17/04/21 13:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Rev Roger Bishop
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3: The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

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Question 5

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I have lived in Capel for 31 of the last 38 years: for 3 years in the centre of Five Oak Green, and for the past 28 years on the eastern extremity of the village.

I have witnessed a huge increase in traffic volumes throughout Capel over that period, with no offsetting changes to the road system. The impact of traffic congestion is bad, and potentially life-threatening, and that is before the new developments in Paddock Wood come "on stream".

For much of the day trying to cross roads locally is dangerous and entails a lengthy wait.

The government is seeking to encourage cycling, but only the hardy and brave continue to cycle on our local roads as they are too busy and life-threatening. It is not unrealistic to expect the numbers of cyclists to plummet if the massive increase in house numbers planned, on top of the huge developments going ahead in and around Paddock Wood, goes ahead.

While there is a good network of rural footpaths which we and many others walk regularly – some of which will be destroyed by the planned development - few roads in the parish, especially those around the proposed new development at Tudeley, have pavements beside them. This means that people have to take their lives in their hands to walk along them, for example to get to the bus stop or to visit the significant heritage site of Tudeley Church, which is also a "working" parish church. It will become a significantly greater hazard to walk along the roads in Capel with the Paddock Wood developments under way now, and even more so if this plan goes ahead.

Rail services from our nearest station, Paddock Wood, are already very crowded. Something I witnessed as a regular commuter even 15 years ago. Network Rail have admitted that the line into London is already at capacity.

There has been no significant change to local services for many years. For example, the local medical practice is already under pressure, with difficulty getting appointments. There is no indication that vague promises of additional services have been agreed with those who have to fund and staff them.

In all of my time in Capel flooding has been a threat in several parts of the parish. The area around the proposed development at Tudeley floods regularly. A video of someone in the winter of 2019/20 swimming along the road to the NW of Tudeley Church (adjacent to the proposed development), and passing a stranded car, is instructive.

The proposed development at Tudeley will seriously exacerbate all of these issues.

In addition: • it will destroy green belt. • it will destroy productive farm land. • it will destroy the habitat of a range of wild life – deer, foxes, badgers, a wide range of birds and waterfowl to name a few. • it will

seriously compromise an important national heritage asset. Tudeley church is the only parish church in the world that has all of its windows by Marc Chagall. The new development will dominate its setting, with its clear views across the Medway Valley. Speaking as an Anglican priest, I am saddened by the real threat to its stillness and calm and the possibility of quiet contemplation, let alone the regular services held there. • it will not guarantee much-needed affordable housing. Experience shows that developers' promises often mean little. • the impact will spread widely beyond Capel, ruining a number of established rural communities.

There appears to have been little or no effort by Tunbridge Wells Borough Council to: • engage seriously with the significant public response against the plan under regulation 18 • consider whether the housing needs figure they have used is soundly based, and uses the most up to date statistics • identify and assess the many brownfield sites within the borough, including in Tunbridge Wells itself • identify and assess the feasibility of building additional floors above existing buildings in the borough, especially in town centres, for domestic use • look carefully at more suitable sites in other parishes within the borough • judge whether it is wise, or equitable, to place such a very high proportion of this current set of developments that they believe are necessary in just one of the 14 parishes and 2 towns in the borough • comment on whether local residents housing and other needs might better be served by seeking to regenerate the centre of Tunbridge Wells, which is in a poor state with regard to empty commercial premises and other vacant sites – such as the former cinema site opposite the Town Hall, which has been an eyesore for many years • consider whether it is equitable that, while council tax receipts from the proposed development would go to Tunbridge Wells, it is the resources of Tonbridge (just a couple of miles along the road) which will come under pressure from any new residents

Question 6

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I cannot identify any modifications that would overcome the negative impact of this proposal.

But the proposed alternative development at Castle Hill overcomes a number of the objections listed above. For example, flooding, transport links (where it is adjacent to the recently upgraded A21), and destroying farm land and an established community (the land is already blighted by the A21 and the North Farm development)

Also, a proper assessment of brownfield sites and building upwards could solve a good proportion of the perceived housing needs. Who knows what percentage if it is not seriously and impartially looked into?

Question 7

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Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter Bowden ([REDACTED])
Address	[REDACTED] Tonbridge TN10 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter Bowden ([REDACTED])
Comment ID	PSLP_2143
Response Date	04/06/21 09:05
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.6
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Peter Bowden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

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I have lived in Higham Lane, Tonbridge for 27 years and am now retired. My wife and I have, over the years, enjoyed many walks in the beautiful countryside around Tudeley, which comprises a typical unspoilt Wealden landscape.

I strongly object to the proposed development plan for Tudeley on the following grounds:

1 Desecration of beautiful Green Belt land with loss of amenity

Under section 136 of the NPPF 2012 it is made clear that any proposed development on Green Belt land should only be justified where *exceptional circumstances* can be demonstrated. There are no exceptional circumstances in this case. Indeed, there are far better sites for development closer to Tunbridge Wells in the Longfield Road/North Farm/Knight's Park areas, which abound the double carriageway A21 road and whose development would entail far less loss of amenity as the land in question is already blighted by the heavy traffic on the A21.

1 Adverse effects on Tonbridge

TWBC has clearly decided to move a very large part of its future development onto the boundary with Tonbridge, with consequential negative effects on Tonbridge. Unless schools, shops, doctors' surgeries, dentists' surgeries and supermarkets are built in Tunbridge Wells as part of the development, residents of the new site will clearly travel into Tonbridge to use Tonbridge's facilities rather than try to get into Tunbridge Wells. This would also include the use of Tonbridge main line railway station for commuters unless a new station were to be part of the development. No one living in the development would dream of using the inferior Tunbridge Wells to London line.

All of Tonbridge's GPs and dentists are completely oversubscribed and its roads are already snarled up in the several daily rush hour periods. Any extra load coming from this development would push Tonbridge roads and services to breaking point.

3. Flood Risk

Building so many houses on this site, which is a very flat flood plain with clay substrate adjacent to the River Medway cannot be justified. There have been many well documented cases of flooding in this area over many years, and this development will only exacerbate the risk of future disastrous flooding. It is unbelievable, after so many national disastrous flooding events brought on in part by climate change, the TWBC could contemplate building in such an area.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Elizabeth Brett [REDACTED]
Email Address	[REDACTED]
Address	- Tonbridge -
Event Name	Pre-Submission Local Plan
Comment by	Elizabeth Brett [REDACTED]
Comment ID	PSLP_1731
Response Date	04/06/21 09:00
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Letter
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Elizabeth Brett
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We have lived in this property and worked in the area for the last 35 years and have experienced a huge increase in traffic on the Hadlow Road. The major problem with these proposals is the devastating impact they will have on Tonbridge and its infrastructure.

Roads: Tuedeley Lane is in places little more than a country lane and already serves the schools at Somerhill at the Tonbridge end. A further school at Five Oak can only exacerbate the traffic situation.

Rail: the main roads near Tonbridge Station are already a major pinch point at peak times in the south of the town. All commuters to London from the new estates are likely to drive to Tonbridge rather than Paddock Wood and parking at Tonbridge is already fully stretched despite fairly recent improvements,

Medical Facilities: no new facilities are mentioned in the plan and Tonbridge is at full capacity.

Flooding: the proposed development area is prone to flooding. What proposals there?

To whom do the benefits of this development accrue? Entirely to TWBC. A major part of their housing target will be met and all income will flow to them. Tonbridge will suffer all the disturbance, disruption, congestion and cost of this proposal which is sited far closer to Tonbridge town centre than to Tunbridge Wells.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lady Elizabeth Akenhead [REDACTED]
Email Address	[REDACTED]
Company / Organisation	British Horse Society
Address	[REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	British Horse Society [REDACTED] [REDACTED]
Comment ID	PSLP_1532
Response Date	04/06/21 16:32
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	British Horse Society
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Numbers: 5.215 - 5.229

Map 32 on p160 of Plan

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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The main village centre proposed in this policy will remove a livery stables at Bank Farm without providing any replacement for it within Tunbridge Wells borough. This will leave those residents of the new development who wish to ride, together with existing livery clients, with nowhere to keep horses or ride.

Para 5.215 This will not be a sustainable, self-contained new settlement if it has no provision for riding stables and routes

Para 5.217 should include horse riding as well as walking and cycling

Para 5.223 (6) should include horse riding

Para 5.223 (7) may sound good but Tudeley will fail to provide the choices and chances for all to live a healthy life if facilities for horse riding, the means of exercise favoured by 4% of the population (mainly women and girls) are removed and not reprovided. It can be estimated that by the end of the Plan period the new settlement will include over 200 people who will want to ride. If no facilities are provided within walking or cycling distance, they will have to drive miles over rural lanes to do so (four car journeys per day for anyone keeping a horse at DIY livery).

Under Policy STR/SS1, 7a, horse riders are again treated as an underclass: whereas walking and cycling linkages are to be provided, there is no commitment to providing any bridleway linkages, as "how the development can enhance and connect to the existing bridleways network" is merely to be "considered". (It should be noted that in fact there is no existing bridleways network in the vicinity, just a permissive toll ride which is unlikely to survive in its present form; the nearest bridleways are a very short dead end bridleway on the far side of Five Oak Green and an equally short bridleway off Alders Road at Capel. Other, longer bridleways are a considerable distance away at Pembury.)

Under Policy STR/SS1, 12b, again, only cycle routes are considered. They should be routes for all non-motorised users.

Map 32 should show which routes are proposed as bridleways or restricted byways (for all non-motorised users). It should also designate an area for a new riding centre or livery stables to replace Bank Farm, linked into the proposed bridleway network.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Para 5.217 should include horse riding as well as walking and cycling

Para 5.223 (6) after “public transport”, delete “walking and cycling” and insert “and all non-motorised forms of transport”

Policy STR/SS1, 7a replace last sentence with “The development should provide a bridleway or restricted byway circular route or network connecting where possible to existing bridleways in Capel and neighbouring parishes”.

Policy STR/SS1, 12b delete “cycle routes and cycle corridors” and insert “routes for all non-motorised users”.

Map 32 should show which routes are proposed as bridleways or restricted byways (for all non-motorised users). It should also designate an area for a new riding centre or livery stables to replace Bank Farm, linked into the proposed bridleway network.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As my attempts after the Reg 18 consultation to discuss this with the Borough Council and with the Hadlow Estate and its consultants have so far met with no response, I wish to discuss it at the EIP.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

As far as horse riders are concerned, the scores for equality, health, services & facilities and travel should all be lower. The effect of horse riders having to travel by motorised means to DIY yards some miles away could also mean that the air quality score should be negative.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Neil Brooks-Johnson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Hadlow [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Neil Brooks-Johnson [REDACTED]
Comment ID	PSLP_85
Response Date	05/05/21 16:57
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Neil Brooks-Johnson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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The proposal contains many what if/maybe type statements regarding transport infrastructure which is key to any substantial build. This is certainly unsound and when tested verbally the designers indicated it was not their problem as was outside their remit.

Any co-operation by TWBC can only be described as cursory in that consultation was sought but any representation from both local people and adjacent councils was disregarded as it was not what the council or landowner sought. We have asked but failed to listen is not cooperation.

TWBC does have to build more houses, however it is clear that their best option is to build houses where they have the least impact on Tunbridge Wells. The proposed developments at Paddock Wood and Tudeley will have a minor impact on TW yet surrounding towns and villages controlled by Maidstone BC (who are also seeking to build at Beltring) and TMBC will have to improve their infrastructure to cope with the increase in the surrounding population without the benefit of the additional rates.

We are all aware that no one likes new building, especially nearby, so a proposal to build the majority of new houses in a borough where there is little representation will be passed because the councillors in the rest of the more populous areas will obviously be able to tell their constituents that they stopped new build in their area. Clearly not development for the correct reason.

Looking at transport links more closely, a new railway station is unlikely. The majority of commuters to London will seek to go to Tonbridge which has more trains and is cheaper than Paddock Wood, indeed the doubling of the size of Paddock Wood will also increase commuting from Tonbridge as many from PW already use Tonbridge. Parking is already limited and trains in normal times are often overcrowded.

The population increase will increase road traffic along Tudeley Lane which often already sees queues backing up as far as the Tumeric Gold, about a mile, junction and roundabout improvements may make a small difference initially, but really with the potential a dual carriageway is the only option.

A cycle path to Tonbridge has been offered to mitigate traffic. Please can we be serious. In the winter how many commuters will take the option of cycling in the dark, cold & wet the two miles to the station? Not a large percentage. Apparently, driverless electric transport may also be offered as technology improves . We need facts not supposition.

The other access to the proposed development is Hartlake Road which is already a rat-run avoiding Tonbridge High Street. The designers verbally admitted that they had disregarded any impact this will have, but the reality is that with the number of new build properties in Tudeley, Five Oak Green and Paddock Wood the impact on traffic will flow all the way to Hadlow and its already congested square where Court Lane joins the A26 at the start of the rat-run.

The roads in the area will become death traps for cyclists in the same way the small lanes around Bromley and Biggin Hill are swamped with urban traffic when only designed for country life.

The proposal is on the opposite side of the road to an AONB, which is there to protect landscape, environment and wildlife. Even if built to the same high standards as Poundsbury the Garden Village will create a scar on the side of the valley visible from a considerable distance, whilst views are nice to have and we can accept that they change and have to put up with some development this clearly has an impact over a much greater area.

The wildlife will be hemmed in at the top of the valley sides and even with corridors through the new development(s) it will have to run the gauntlet of a much busier road. A major new development on the edge of an existing AONB is hardly protecting it.

Flooding has always been an issue in this part of the Medway Valley whether at Tonbridge, East Peckham or further down at Yalding. These new developments whilst unlikely to flood in themselves will create substantial runoff, speeding water flows and making flooding more likely. The proposal suggest that satisfactory mitigation will be put in place, but can it be sufficient to protect the other locations already susceptible to flooding?

One of the reasons put forward by the landowner is the average quality of the land. The reality is that the land is more than good enough to grow top fruit and soft fruit. Products which are in heavy demand by the supermarkets (they cannot get enough UK apples) yet the landowner seems reluctant to invest in agriculture preferring to turn vast swathes of his land to gravel extraction or solar power and now a big chunk over to housing. We should be investing in agriculture not destroying it as the UK population increases.

We do need development, but it should be in the right location. Approval of this proposal risks creating a mega-conurbation running from Paddock Wood, Beltring, East Peckham, Five Oak Green, Tudeley and finally to Tonbridge destroying this part of the Medway valley for ever. The addition disruption to the local economy, wildlife and infrastructure does not merit destruction on this scale in this location. Other sites with better infrastructure already exist (e.g. Castle Hill) and should be explored properly rather than allowing this site which is a landowners vision aided by a council who are happy to take an easier option if someone else foots the bill.

As said earlier impact on services of a development of this size will affect the neighbouring town of Tonbridge especially health, transport, parking, leisure facilities and impact upon Tunbridge Wells will be negligible although benefitting from the increased rates. Tudeley whilst being in TWBC is aligned almost entirely to the nearby local town ,Tonbridge. Mention is made of facilities that will be included in the development, but one expects that this will largely be after the event and not before pushing the existing facilities in Tonbridge to breaking point or worse.

The costs of building new bridges over the railway may also prove prohibitive leading to only half of the village ever being constructed, ensuring that the promised facilities are never provided because the developers cannot than afford to do so.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan continues to espouse the ability to build a new railway station, yet the rail authorities have said on numerous occasions that it would simply not be a viable option as its location is only 2 miles from Tonbridge and trains would not be able to start and stop efficiently in that distance.

Clearly TWBC would be keen to proceed as it involves just one landowner, keeping it simple, and who has spent much of his own money developing the proposals this saving the council from spending themselves.

The entire vision for Tudeley Garden Village is based on unsound principles, destroying so much more than a few fields because of its location and no mitigation will restore the damage done for future generations to enjoy.

Please start again and look where there already are good communication and transport links and at that stage put plans forward to build a similar development, after all Poundbury is an urban extension to Dorchester, utilising and enhancing existing links rather than creating new and destroying the environment in the process.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

No thank you

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alison Cain [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Alison Cain [REDACTED]
Comment ID	PSLP_1165
Response Date	03/06/21 21:46
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Alison Cain
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I live close to the centre of Capel with my family. In my view, the sustainability and viability of the plan (Policy STR/SS3) has not been adequately addressed in in many areas and as such the plan is unsound, but of key importance to me are the following four aspects:

- . 1) The increased risk of flooding has not been investigated sufficiently or evaluated properly. There is presently already a very high flood risk potential in this area for the local communities (not to mention the proposed new homes) which would be made significantly worse as a result of building such a huge number of houses directly on and next to recognised flood plain areas. Flooding in this area is already an almost annual major problem with many peoples live being adversely impacted. Increasing this risk further by building and concreting on huge area of agricultural farm land will only increase the risk of flooding and make it even harder and significantly more costly for residents and businesses (both in terms of insurance premiums, if available, uninsured damage and the devastating mental anguish). Building in such an area and to such a disproportionate extent should not be promoted by any council and is not part of the Governments' local planning objectives. Drainage at the new houses can by no means remedy this. This risk is exacerbated even further by the acknowledged impact of climate change on flood potential.
- . 2) The destruction of vast areas of Green Belt land bordering AONB land is abhorrent. This development would obliterate the rural setting that Capel and Five Oak Green presently enjoy, along with destroying the current high levels of biodiversity that surrounds us. The extent of the proposal is such that it effectively merges Tonbridge, Tudeley, Capel and Paddock Wood and thereby totally ignores the purpose of designated 'Green Belt' land which is "to assist in safeguarding the countryside from encroachment" and "to prevent neighbouring towns from merging into one another". The negative impact of the proposed development on climate change is clearly demonstrated in the sustainability appraisal, along with air, light and noise pollution levels increasing significantly.
- . 3) The existing foul drainage and sewerage system is already totally inadequate even for the existing population and frequently fails and is a major environmental disaster national headline waiting to happen. The massively increased burden that the proposed development would place on the system has not been considered (or whether it is even possible at all) or allowed for in the plan (from either an engineering or cost perspective) and would undoubtedly make this disaster a near term reality.
- . 4) The plan does not include anywhere close to proper or full consideration of the detrimental impact on the local transport network and road infrastructure of building such a large number of new houses in this location. The huge amount of roadworks required by the proposal would place severe disruption, strain and untold stress on the local community and infrastructure, not to

mention the long term massively damaging and irreparable impact on this beautiful rural Green Belt / AONB setting.

Question 6

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Areas other than this are more variable, including use of brownfield sites adjacent to existing villages and towns.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Chris Callander [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley Tudeley, Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Chris Callander [REDACTED]
Comment ID	PSLP_1118
Response Date	04/06/21 13:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Chris & Suzanne Callander
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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We believe that the plans for Tudeley Village are **unsound and have not been positively prepared** for several reasons, which are outlined below.

Firstly, in terms of whether the plan has been positively prepared, we believe the various supporting documents, assessments and conclusions have been shaped to make it possible to put forward the plans for Tudeley Village, rather than to assess its suitability and viability – for the following reasons:

At the very first public meeting, held to share plans for Capel parish and Paddock Wood, the head of planning at Tunbridge Wells Borough Council (TWBC), Stephen Baughen, told the room that the Tudeley Village development had been chosen because it was ‘the easy option’. When challenged on this point in the following months, he denied this and tried to backtrack from the comment. However, the meeting was attended by well over 100 local residents and representatives from the local media who have his statement on record. Taking the easy option is not a justification to destroy hundreds of acres of prime green belt agricultural land and blight the lives of several hundred local residents for 10-20 years.

We do not believe that the planners have given due regard to Para 137 of the NPPF, which states that:

‘Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.’

The results of the original consultation into available sites are now unavailable on the TWBC website – and instead, the results are merely préciséd in a 2019 document. This missing document pointed to the fact that a garden village was not the preferred option.

Indeed, one of the preferred options until this point was known as the A21 Growth corridor, but it was not pursued as an agreement between multiple landowners had not been reached.

Further calls for sites were issued, and when the CA1 land was offered up for development by the landowner, late in the local planning process and after two calls for land, the strategies chosen originally suddenly changed. This reversed the original reasons set out for not using land in the vicinity of CA1.

Then, sometime later, a developer was able to secure an agreement with the landowners at the site known as Castle Hill and proposed an alternative site to CA1. However, TWBC dismissed the proposal out of hand, citing reasons it had not cited at the first assessment of the area.

These are two key reasons why we believe the work has been carried out to support, not truly assess, the development of CA1. This is backed up by detailed legal and procedural failures, which the Save Capel campaign will be highlighting in its representation.

The plan also fails in regard to whether it has been positively prepared where consultation is concerned.

The NPPF Para 72 states that:

'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.'

In developing the Local Plan, TWBC did not effectively work with the community. Yes, it went through the process, but it ignored the results of that process. Indeed the views of the local community have been ignored, and existing Capel residents marginalised during the entire plan-making process. The council received what it said itself was the largest response to a consultation it had seen. And over 90% objected to the plans for CA1, CA2 and CA3. The council's response to this massive rejection of its plans was to increase the number of houses to be built in CA1 and CA2. The community then came together to support an alternative large-scale development within the parish, Castle Hill, as mentioned above. This recognised that the community accepts the need for housing but proposing an alternative that the community could support. And this was rejected out of hand and with questionable justification.

In addition, claims made by TWBC about its consultation are simply wrong. In Para 3.11 of the Consultation Statement for Pre-Submission Local Plan, TWBC states that its Local magazine is sent to every resident in the Borough and that that action formed part of its consultation. It is not. Residents in Brampton Bank, a section of the B2017 where resident's gardens join the perimeter of the CA1 site, have never received the title.

The plan is **not being positively prepared** as the master planning carried out by Hadlow Estate for its CA1 site is not included in what is being presented to the Planning Inspector. We feel it is impossible to judge the sustainability and deliverability of the Local Plan without the inclusion of this key series of documents for the CA1 site.

As the master planning for CA1 has been carried out separately from the wider context master planning, there is a complete disconnect between it and other externally created reports. This approach has resulted in a confused and disjointed plan. The submitted Strategic Sites Masterplanning and Infrastructure Main Report focuses heavily on the detail of Paddock Wood plans but barely mentions the Tudeley, CA1, site in any detail.

Allowing these two huge new developments within a few miles of each other to be planned by separate entities cannot deliver a plan that properly allows for the impact on infrastructure, let alone many other aspects reliant on local influence and impacts.

We also believe that the plan is **not sound**. The head of planning at TWBC, Stephen Baughen, also said in public that the Tudeley Village would become a 'dormitory town' for residents in London looking to move to the country and commuters looking for easy commuting access. This was yet again a comment he later tried to distance himself from. But it flatly contradicts any claims that the increase in housing is to meet the needs of the Borough's residents.

The plan is also not sound for its failure to meet the NPPF para138, which states that:

'Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.'

The CA1 proposal does not meet this requirement.

No green belt land has been safeguarded between urban areas and the green belt. In order to meet longer-term development needs stretching well beyond the plan period, this is very likely to result in coalescence and urbanisation between paddock wood and Tonbridge. This fear has already been demonstrated by the late addition of more building on green belt land adjacent to the CA1 site for a secondary school.

The plan is also **not sound** in terms of the infrastructure plans.

Whilst it may be possible to use the 'infrastructure before expansion' soundbite being bandied about by politicians and supporters of the plan, the reality is that it only refers to the planning of infrastructure, not its delivery. The phasing of the development of critical infrastructure, particularly in CA1, suggest serious transport issues will be felt for many years, even decades. Shops, primary schools and

secondary schools are not planned on the CA1 site until a late stage in the site development process – where will all the residents of CA1 go to shop, and 1000s of children go to school and where will they register for a GP before the site is large enough to offer these facilities? The result of this will be hugely detrimental to existing residents of Capel and local areas – most of the CA1 residents will be aiming for Tonbridge town for these vital facilities for many years.

The *Tunbridge Wells Local Plan Update Baseline Review Report Tudeley Village* (produced by Stantec) suggests that 11% of residents will go to neighbouring Tonbridge. That suggestion is massively out of touch with reality. This is especially the case when it is noted that there is a forecast of 20% traffic heading in the opposite direction to Paddock Wood. Having lived in the area, abutting the border of the CA1 site, for some 20 years and being familiar with traffic movements, we cannot understand how modelling can suggest this.

Across all documents we have reviewed, we can see no suggestion that the B2017 between Tudeley Village and Tonbridge will be developed to cope with a massive increase in vehicle journeys. At key commuter times during school term times, the B2017 is already highly congested. This is due to the extra vehicle traffic taking and collecting students from the Somerhill school close to the B2017/A26 roundabout. The traffic heading from Five Oak Green to Tonbridge on this route is regularly start-stop backing up from the B2017/A26 roundabout past the Hartlake Road junction and stretching for close to a mile and a half, sometimes more. It is impossible to see how improvements to the B2017/A26 roundabout can improve this situation. And when hundreds of additional cars are added to this route, it will become even worse.

Also, no improvements are planned to the road infrastructure which carries on from this roundabout into Tonbridge town ctr and its schools, shops and businesses. This is because it falls outside TWBC's reach. These routes are also already heavily congested. And not just at key commuter times. In between building the first houses and any infrastructure development, this will make moving around the area neigh on impossible.

Also, we would call into question the forecasts around journey carried out by bicycle. There is a suggestion that there will be significant journeys between the CA1 and CA2 developments and key town centres, including Tunbridge Wells. This assessment fails to recognise elevation. The elevation at the centre of CA1 is approximately 73ft above sea level. At the A26 close to Pembury, a relatively direct route to Tunbridge Wells centre, it is 376ft – over 300ft difference. At the bottom of Colts Hill at the B2017/A228 roundabout, the elevation is 79ft, and at the top of Colts Hill it is 440ft, a difference of 361ft. Surely it cannot be expected that anyone other than a few dedicated cyclists will use these routes regularly.

For these reasons, we believe the plans set out in Policy STR/SS 3 and the supporting documents have not been properly prepared and are unsound.

Chris & Suzanne Callander

X Brampton Bank

Five Oak Green Rd

Tudeley

TN11 xxx [TWBC: full postal address redacted for personal data protection]

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In respect of Policy Number STR/SS 3 we believe that no modifications can be made to make CA1 a suitable development, and therefore it should be removed from the TWBC Local Plan.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

☐ Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Heather Campbell [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Heather Campbell [REDACTED]
Comment ID	PSLP_1344
Response Date	04/06/21 15:44
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Heather Campbell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3 For Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We are residents of Paddock Wood, backing onto the proposed East Capel site. We brought our property 2 years ago to start our family. We loved the small town friendly feel of Paddock Wood and the beautiful surrounding countryside. Which will all be lost with the proposed plan.

Creating a 4000+ new houses in paddock wood, almost 40% of all the new housing in the whole of Tunbridge Wells (1,500 new houses in East Capel) and a garden settlement at Tudeley of 2,800 dwellings will cause immense harm to residents of the Parish of Capel and Paddock Wood as well as to residents of Tonbridge. So 65% of the new houses will be in the Capel and Paddock Wood parishes. There are other more suitable sites such as the A21 corridor

Here we outline some of our main concerns:

Flooding

The plan is to build on flood plan. This will require extensive flood defences – which will divert funding from other areas and increase the flood risk to Paddock Wood and the surrounding area.

Last year many houses on our road, Ribston Gardens, flooded leading to destruction of property and upset, and we can expect this to be common place if the land behind our house is built on.

Any mitigation for Tudeley and Capel will just move the flooding problem further down the River Medway to places such as Yalding which has suffered from significant flooding over many years.

Biodiversity

Pipistrelle bats (various species) are nesting in the local area, including our neighbour's trees, which will back onto the new development. These bat species have a conservation order protecting them, so any planned development needs to abide by the standards set out by British law. We also have a huge range of animal and bird species, listed below, which visit our garden regularly: Hedgehogs (Listed on Britain's most endangered animals, population has declined by a third since the millennium) Badgers Foxes Rabbits Robins Blackbirds Wood pigeons Blue tits (nesting in the woods by Tudeley brook behind house) Goldfinches Thrushes Magpies

Sparrow Hawk – in field behind

Heron – Tudeley brook

Butterflies – cabbage white, red admiral and Kentish blue

Dragonflies

Frogs.

The current plan does not appear to be taking the wildlife into account. The table listed on the plan for this area simply said 'limited biodiversity constraints', which we feel is not taking into account the range of animals present in the area, particularly the endangered ones, which will be severely affected.

Green belt

1000's of acres of Green belt land will be lost. Why are the brown belt sites not being considered first?

The current plan will destroy existing old woodland, which is vitally important for countering global warming. The companies building may well plan to plant new trees to offset new carbon emissions, however trees take many years to mature and so this will not benefit the environment for many years to come. Global warming is a huge problem which we have to tackle now before it's too late and this will exasperate it.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

This land is Green Belt land and should only be built upon if an "exceptional circumstance" exists. Most of our objections outlined above apply to the Tudeley settlement as well.

Wellbeing

We have lived in many places (Cambridge, Portsmouth and Gravesend) but chose to buy our first house in Paddock Wood as we wanted to live in a beautiful green belt area. With all the health and wellbeing advantages of being in the countryside. This last year with the Covid-19 pandemic has shown how important wellbeing is. We wanted to bring up our children in a quiet area and less polluted environment.

Pollution

Air quality will decrease – this is very worrying to us as I suffer from asthma. One of the reasons we chose to buy a house in Paddock Wood this year was the lovely fresh air to help me, which will be lost with this new construction. Additionally light and noise pollution will increase.

Sewage and water

Sewage systems already can't cope, already approved developments now being delayed because of this and additional work having to be done to make them viable, for example the development along Badsell Road.

Housing need

Currently, Paddock Wood and the surrounding has seen a massive slowdown in the property market. People are preferring to look at places such as Tunbridge Wells, Sevenoaks and for convenience to London places such as Ebbsfleet Garden Village. When we were buying our house there were many properties which had been on the market for a very long time and having to make multiple price reductions to try to sell as this is not a popular area at present. The rate of sales has slowed down so much that local estate agents have started closing down. We struggle to see who will be buying these thousands of new homes when the houses already in Paddock Wood aren't selling.

Health services

Paddock Wood and the surrounding area already requires a new Health centre for the current population, Woodlands Health Centre is already stretched to capacity, and wait times for doctors' appointments are excessive. Plus there is a lack of dental and social care which is not addressed in the local plan. Even with the proposal for a medical centre in the plan we are still concerned about the increased demand. It is difficult to judge the capacity of the proposed Health Centres as no size is given in the Plan.

Schools

The Plan proposes additional schools to be built in both sites. But it is not clear if this will be done before all the houses are built leading to oversubscribed schools.

Roads and Transport

We both commute to work and the trains are already crowded, the new development will make trying to catch peak time trains impossible. Other public transport will need to be increased tenfold to cope with the additional people wanting to get to Tunbridge and Tunbridge Wells, currently bus services are inadequate at best. Road congestion will become normal in Paddock Wood with the 4000+ proposed houses. The road from Paddock Wood to Tunbridge B2017 is already seriously congested during the

school run period. This plan will result in even more congestion as people try to get to the new schools or A21. There does not appear to be a solution in the plan.

The plan states that cycling and walking to the station will be encouraged by the building of new cycle and pedestrian routes. The route from Tudeley to Tonbridge is shown as following the B2017 which is not wide enough to allow a separate cycle or pedestrian path. The proposed cycle route from Five Oak Green to Paddock Wood requires either crossing the busy A228 adjacent to the railway bridge limiting oncoming driver's vision or crossing at the centre of a right hand bend which has already been the site of several accidents.

The proposed bypass for Five Oak Green would not stop vehicles using the road through the village as a short cut, especially those heading towards Maidstone. Also the proposed bypass assumes that the Colts Hill bypass will be in place. As the Colts Hill bypass has been agreed for over twenty years and not even scheduled how likely is it that the Five Oak Green bypass will be built? So we are likely to have to suffer the lorries required for the building work going through the village for the 20+ years necessary to complete the plan.

Emergency services

Currently, Paddock Wood only has a part time fire service and doubling the number of properties will require a full time permanently operational fire station which there appear no plans for. Also, the local hospital in Pembury will have to expand to cope with the mass increase in the local population.

Utilities

Will the existing electrical substations be able to cope with the increased demand? Would additional pylons be required or will the main power supplies be sunk in the ground resulting in either additional eye sore and environmental impact.

We have heard there is a lack of a gas pipe across the Capel Parish and worry about the implications of this for the new development.

Overall, we are deeply trouble about the new plans which will destroy the beautiful green belt land, kill the wildlife and will also apply pressure onto the neighbouring borrow of Tonbridge and Malling owing to Paddock Wood location next to Tonbridge.

Yours sincerely

Heather Campbell and Alexander Christofis

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
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Supporting Information File Ref No: SI_46

Comment

Consultee	Hugh Patterson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Capel Parish Council
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Capel Parish Council [REDACTED]
Comment ID	PSLP_823
Response Date	02/06/21 10:56
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	VfC Document v11.2.pdf (1)
Question 1	
Respondent's Name and/or Organisation	Capel Parish Council/ Hugh Patterson Chair of CPC and Borough Councillor for Capel Ward
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No
Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Comments on STR/SS3 by Capel Parish Council.

These comments have been drafted by the Chairman of the Council (who since 6th May 2021 has also been the Borough Councillor for Capel Ward) in consultation with other members of the CPC and contributed to by members of the Capel Neighbourhood Plan Working Group.

The policy is not legally complaint because you are in breach of your Statement of Community Involvement para 1.7 "The objective is to ensure that everyone with an interest in planning understands how they can contribute to, and influence, the planning decision-making process"; this has clearly not been possible as you have insisted in rushing this through during a pandemic. 1.10 fails to comply with the Equality Act 2010 as you have not ensured that involvement will be open to all, regardless of **age, disability**, gender, pregnancy and maternity, race, religion and belief, **rurality**, and sexual orientation and 1.12 it does not produce "better outcomes that meet local aspirations and requirements". We would submit the local aspirations and requirements of the residents of Capel Parish have been completely ignored, despite you being repeatedly been made aware of them by Capel Parish Council and others.

Capel Parish council have major concerns about the lack of sustainability of the site, and the weakness of community engagement, alongside its impact on the historic Medway Valley landscape, and the historic town of Tonbridge.

A. It is not positively prepared.

The planning process lacks community engagement and support. TWBC has only made limited attempts to engage with local residents or win their support. There was an exhibition at Regulation 18 in the summer of 2019 but nothing since. In the 'Vision for Capel' consultation carried out by Capel Parish Council's Neighbourhood Plan Working Party in August 2020, to which 25% of all households replied (the consultation was not online – but required residents to post their responses through a nominated post box) found 95% opposition to the plans at Tudeley. TWBC have carried out no such attempt to gauge the views of residents. The local election results in May 2021 showed the highest turnout, biggest swing and largest majority for the candidate clearly campaigning against these proposals. The lack of community engagement is clearly demonstrated.

CPC deplore that this consultation has been carried out during a pandemic when it easily could have been delayed. Not only did it start before the election period for our Parish and Borough elections (something you seemed to have overlooked in your haste) but proceeded despite the pleas of the parish council to delay until after the local election and pandemic lockdown. The online nature of the consultations (necessitated by the insistence of carrying them out during lockdown) excluded those of our residents with no or limited access to the Internet. Your provision of access to a hard copy available in the Gateway in Tunbridge Wells (over 6 miles away with no direct public transport service) was inadequate. It was only on May 11th six weeks into the consultation that a copy was provided to the Parish Manager and Clerk; and even then, she had to collect it herself from Tunbridge Wells.

It is unclear to us why in the Issues and Options stage when 60% of the responses favoured the A21 Corridor this option was not pursued given the money recently invested in dualling the road and its good connections to the rest of West Kent and further afield. Capel Parish Council have supported another site (also within the parish) at Castle Hill which would provide 1600 houses close to the A21. Although this site is in the AONB it is much more enclosed than STR/SS3 and building there would have a much more limited impact on the landscape. STR/SS3 adjoins the AONB and building on this sloping site would both be visible from the AONB but also damage the unique Low Weald landscape of the Medway valley. The Castle Hill site we understand is also in one ownership (something the council claims as an advantage for STR/SS3) and adjoins a key employment area, also in the AONB, which you have already identified and included in the plan.

There is no real explanation in the PSLP as to why other large scale sites were rejected. Capel Parish Council believes that Tudeley was not the original choice as a stand-alone garden settlement, and that the choice was more to do with the single landownership than the absence of constraints. The nature of land ownership is not a good argument for rejecting a site outside the Green Belt for one inside it.

The original Distribution of development topic paper prepared for the DLP in 2019 Chapter 6: Formulating the development strategy (p.14): Paragraph 6.2 also expressly stated that the second 'Call for Sites' was undertaken between May and June 2017. In the Interim New Local Plan Strategic Housing & Economic Land Availability Assessment 2017 it was stated "although the call for sites remains open, it will no longer be possible to include any new sites within the site assessment process that is informing the Draft Local Plan (being prepared under Regulation 18) **as there is insufficient time to adequately assess such sites.** (TWBC will continue to accept in order that they may be assessed & potentially included at Reg 19)". The evidence base persuaded you to opt for Growth Strategy Option 3 (existing urban distribution plus villages) and Option 4 (A21 growth corridor). There was a possibility of Option 5 (new settlement) in the longer term (8 possible sites but 5 not shortlisted including STR/SS3). Presumably, this underwent a robust process based on robust evidence. This was still the preferred stance in March 2018, however in April 2018, there appeared to be a complete change of direction which resulted in the allocation of 60% of the proposed development to the Parish of Capel. **Where in the Local Plan is this new evidence base?** There has been no convincing explanation of the Council's change of course in the Spring of 2018 and no convincing reason why SS/STR3 was chosen over the alternatives. There is only very limited information in the SA on why alternative strategic sites to STR/SS 3 were rejected (far less information than on small scale sites rejected) e.g., there is no comparison with the site in Horsmonden and its 'severe access difficulties' [not explained] and the sites chosen. It is not measured against the comparative negative criteria in Tudeley despite the latter being in the Green Belt and bordering on AONB. A garden settlement, should there be one, would be best in the middle of the Borough, to make it accessible north and south. It is totally counterproductive to put affordable housing right at the very north of the borough when so many residents live in the south, and where there is little demand for it. The Castle Hill proposal would be a much better solution in this regard. There is also only limited demand for this number of houses in Capel Parish which has a comparatively small population, as most prospective buyers and tenants would be expected to come from outside the Borough and would presumably prefer to live in or nearer Tunbridge Wells.

There is no evidence that makes Tudeley a better site for a Garden Village than for example, Horsmonden. The justification for not placing a garden settlement at Horsmonden is that "This would be a very large scale strategic allocation that would be disproportionate to the size of the settlement, with concern about landscape and heritage". Tudeley is a tiny hamlet, with 50 houses at most. The whole of the Parish of Capel has only 954 houses in it. Adding 2,800 new houses at Tudeley is a

massive increase that is far higher than the proportional increase would be elsewhere in the Borough. Tudeley is also home to a world renowned heritage asset – All Saints Church - the only church in the entire world to have a complete set of stained glass windows designed by the artist Marc Chagall. There is no equivalent heritage asset elsewhere in the rural parts of the Borough.

Tudeley has a beautiful, rolling landscape with abundant wildlife, fertile soil, and high biodiversity scores. This is undervalued in the PSLP, for example, Policy EN13 makes no mention of historic hedgerows and patterns which cover the Low Weald Area and have their roots from mediaeval times. The site is entirely within the Green Belt, and the High Weald AONB is within a few yards of the proposed development site. Views in particular from the High Weald looking over the Low Weald will be seriously compromised.

Comparatively, it is stated that Horsmonden, for example, has severe access difficulties. The access difficulties on the B2017 and Hartlake Road are at least as severe and the impact of the extra traffic on Tonbridge's overloaded road infrastructure will have severe effects there too. Capel Parish Council does not believe exceptional circumstances exist to justify building at Tudeley. The only argument presented anywhere is that Tudeley has a single landowner and other sites multiple landowners. **Your reluctance to deal with multiple landowners is not an “exceptional circumstance”.**

Since the Regulation 18 consultation and the exhibition put on by Hadlow Estate in Tunbridge Wells (6 miles away from Capel parish) in October 2020 there has been little attempt at community engagement in relation to this site. The feedback form attendees were asked to fill in largely related to the design of the houses not the principle of development. At the exhibition HE's representatives focused on the site itself and displayed little interest in the requisite infrastructure or the impact of their development on surrounding communities. Hadlow Estate's representative has attended the SSWG but has only engaged once with the parish council as a corporate body, which was about arrangements for the proposed Charette in March 2020. Hadlow Estate's original intention seems to have been engagement with individual parish councillors, but they refused to present before the whole council when invited in 2019. All questions put to you about the site have been treated as a matter for Hadlow Estate. All we now have is their 'Delivery Plan' on their website, which we are treating as indicative only.

Para 5.4 under Hadlow Estate's vision and Approach p. 18 of the SS Topic Paper talks of a landowner-led project. Yet we are told that the inspiration for Garden City projects is 'community led' [para 2.3 of the Strategic Sites Master planning and Infrastructure study] and thus far there have been no attempts to involve the community in the principle of what the landowner himself at a SSWG meeting called an 'urban development'. They have only tried to cajole residents into expressing opinions on the nature of the housing design. We are faced with a development, that far from being community led, will be one planned by the landowner, who seems to want to retain control of it into the future. This is a top down plan not a bottom up community led plan, which was the model to which garden settlements were meant to conform.

Capel Parish Council also deplore that the SPD for this site is not available and we have not had sight of it at this important stage, especially since TWBC stated that consultations with stakeholders would commence in early 2021. This is another sign that this plan is being rushed through without sufficient and **transparent** consideration.

B. It is not effective.

The PSLP is over reliant on this one site to deliver a large proportion of its housing with no guarantee that this landowner with no experience of large scale housing development can deliver in a timely manner. The logistical difficulties of building a 'Garden Village' from scratch with no existing infrastructure and relying on two rural lanes to move plant, machinery, equipment and building materials seem not to be a consideration of this PSLP. We consider the Castle Hill site would present much less of a risk by comparison, surrounded as it is by existing infrastructure and backed by more experienced developers.

C. It is not justified.

- 1 **This site when seen in combination with STR/SS1 and the recently adopted Kent Minerals Plan, will put a disproportionate burden on this parish as it is required to take 4160 houses in the plan period with another 700 to follow in Tudeley.** This can be seen alongside a total of c.2000 houses being built in next door Paddock Wood, work on which is already underway. The impact of this will change the nature of our small rural community forever.

The Local Plan will destroy rural enterprises, such as the equestrian facilities at Bank Farm alongside other businesses in Capel Parish. The natural environment will be badly damaged if the development of new housing in Tudeley together with East Capel goes ahead. Neighbouring businesses will also be affected during the long building process, including huge amounts of roadworks on one of the busiest roads in the Borough, the B2017. These works are bound to take many years and will put untold stress on the local community. Moreover, the Tudeley and East Capel proposals, which are within two miles of each other and share the same road links, are scheduled for development in the same timeframe. This will place severe and disproportionate strain on the local community and infrastructure. A garden settlement would be better in a more remote part of the borough outside the Green Belt and AONB, to give that area a boost and to minimise disturbances caused by construction. The two sites that satisfy the criteria and are identified in the evidence base have not been explored further in the sustainability appraisal. This site is within the recognised 1km AONB buffer zone and so is entirely unsuitable for development of this scale. The associated road infrastructure will have an even more damaging impact on the setting of the AONB.

The plan proposes to release land at the very heart of the Green Belt in the parish to accommodate Tudeley village and despite the words in para 5.17 of the SS Topic Paper such a large intrusion in the Green Belt only just west of Five Oak Green is going to lead to the impression of urban sprawl all the way from Paddock Wood to the Hartlake Road junction. The compensatory improvements to the Green Belt are limited, unclear and superficial.

- 1 **CPC believe the site is not sustainable. The council relies on Hadlow Estate for the Master planning of the site. They seem more concerned about the internal layout and appearance of their site than its impact on the local infrastructure.**

Without a railway station (which Network Rail have said is not possible for technical reasons) communications with the surrounding area will rely on the car and active travel. There is little evidence put forward by you or by Hadlow Estate of a Modal shift in transport and the impact on the road westward towards the A26/B2017 roundabout has been underestimated.

- . The site is too far away and too ill lit for cyclists and walkers to use for commuting to Tonbridge, particularly in winter. Para 5.21 estimates the cycle journey time 'could be 22 minutes' across what is at the moment unlit farmland. The evidence of a modal shift of transport in this way is limited and given a car journey to Tonbridge outside rush hour of 5 minutes, it is unlikely that most residents will do this.

The settlement will be dependent on the B2017 for traffic westwards to Tonbridge. This is now a heavily used rural lane with queuing traffic towards Tonbridge in the early morning peak. The plan proposes works to create a roundabout at Hartlake Road with junctions to the proposed estate roads within the site. Once again it is difficult to comment when the SPD has not been provided. But the plan seems to require Hartlake Road to be closed at the bridge sending the traffic through the development which would imply a roundabout further to the East (where?). However, in our judgement these works will not be sufficient to cope with the traffic from this site combined with a proportion of that from the sites near Paddock Wood. The DLA infrastructure study also suggests that there will need to be widening of the B2017 as well as 'improvements' to the junction at Hartlake Road and elsewhere but para 5.19 of the SS Topic paper says traditional orchards adjacent to the B2017 will be protected. Both will clearly not be possible at the same time.

- . The plan would also put an unfair burden on the residents of Tonbridge and Malling whose infrastructure the new residents will access. 'The 'master planning approach' will come to a grinding halt at the boundaries of Tonbridge, a town whose infrastructure has grown slowly over the last millennium and can hardly be expected to adjust to this challenge imposed on it by the planners of the neighbouring authority. We note the open opposition to this part of the Plan by all Tonbridge and Malling Council members who spoke at their Planning and Transportation

Committee meeting on 17/5/21 and that by the end of this Consultation T&M still have not signed a Statement of Common Ground. Capel Parish Council believe you are in breach of your Duty to Co-operate with Tonbridge and Malling given the impact this development will have on the neighbouring settlements there and the concerns raised by their elected members in a public meeting only a few days before the close of this consultation.

- . Without this site your own documentation states the proposed 'Five Oak Green by-pass' would not be necessary. This road will require the loss of productive agricultural land, affect the setting of the AONB and damage two designated rural lanes (Sychem Lane and Church Lane). It will also require the building of a roundabout opposite Capel Primary School; given the traffic difficulties here at drop off and pick up time this would seem a particularly retrograde step. We are also concerned at the traffic pollution risk posed to Capel Primary School (not to mention a future proposed secondary school) especially at a time when government is trying to alleviate pollution levels on roads near schools. In any case a bypass round Five Oak Green would also not solve the traffic issues further westward along the B2017 something that is not addressed in this Plan and would not help the Borough achieve its net carbon zero target by 2030. The plans for this road seem particularly under-developed, we suspect partly because this was not the main focus of DLA's flawed master planning for Capel. Once again comment is made more difficult by the absence of the SPD at the time of this consultation.
- . **CPC believe it is two settlements divided by a railway line, neither of which satisfy garden settlement principles.** The site is divided by the main railway line to Ashford with only Hartlake Road and a narrow Tunnel on Sherenden Road linking the two sides. Not only does this render the southern part of the site prone to flash flooding it also makes it difficult to see Tudeley as one community in the future. It is unsuitable for a garden settlement because it has a main railway line running through the middle of it with only two crossings. At Hartlake Road on its boundary (no more than a country lane) and Sherenden Road which is so narrow that only one car can pass at a time under the railway embankment. (Both are designated rural lanes – Hartlake Road is in the top 10% of the Borough in terms of historic and amenity value). The developers propose to create a tunnel (which would be very expensive and require major works to the railway which is the main Tonbridge – Dover line) as part of the main spine through the development. This would again damage this designated rural lane, but without an SPD it is difficult to use our local knowledge to comment further.
- . This site is under single ownership which appears to be the overriding factor in its selection. The landowner has no track record in managing or master planning a development of this size, and they are not widely trusted to do so within the wider Capel community.
- . Development on the site will adversely affect flood risks in Tudeley and neighbouring Yalding, Golden Green, East Peckham, Hadlow and Tonbridge. The River Medway is more prone to flooding in recent years, and the impact of a failure in the Leigh Barrier has not been considered, particularly in light of rapid increase in sea levels and other Climate Change factors.
- . The proposed phasing of the build would mean disruption to the local community and the traffic along the B2017 for the whole of the plan period. For example, it appears there will be no school built in Tudeley until phase 3 (1,000) houses, and the costings suggest that infrastructure will be paid for by S106's which will mean the houses will be built first putting an additional strain on the local community, facilities and the road infrastructure.

1 **CPC believe the effect of the development on the parish is disproportionate.**
The SA is based on the needs of the Borough as a whole it pays little attention to the cumulative effect on Capel Parish and impact for current residents. It is clear that this parish is bearing a hugely disproportionate burden of this plan. The environmental impact of the development in the Green Belt (with these two major sites in one small parish), added to the impact of road building and associated transport infrastructure for these schemes on the setting of the AONB will disproportionately damage the quality of life for Capel residents over the coming years. This strategy needs to be rethought to protect the quality of life for residents in Capel who cannot be expected to bear the full burden of development for the whole borough.

1 **CPC believe the design plans for Tudeley village will not respect the historic Low Weald countryside and will be an urban intrusion on this rural landscape.**

Unlike the master planning for STR/SS1 master planning of Tudeley is the preserve of Hadlow Estate. Hadlow Estate are not experienced developers and have only shared indicative plans with the local community. These appear to be an urban intrusion on a rural landscape and will be completely inappropriate for this Low Weald landscape. We fear a high end urban development completely out of keeping with the local heritage and landscape, designed to appeal to an upmarket London based clientele. The comparison the developers have made with the soulless and still unfinished Poundbury estate does not fill us with confidence. In addition to the damaging impact this development will have on the Greenbelt, following its removal from it, there is also the strong adverse impact of the proposed Tudeley Village on the landscape of the whole Medway Valley. You should be more sensitive to the fact that the site SS/STR 3 lies on the southern slope of the Medway Valley, and is visible from all points along the north slope from up to twelve miles away appearing against the backdrop of the High Weald AONB. The view (for example, from St Michael's East Peckham) will be severely damaged from points right across a 60 square mile area.

1 CPC believe the plans will lead to the loss of BMV agricultural land and have a negative impact on the Borough's climate change targets.

The area is predominately comprised of BMV agricultural land, hence its importance historically for fruit and hop growing. As the Policy recognizes there are few areas of Grade 2 land in the Borough one being in the area of SS/STR3 so it would be scandalous to lose it to concrete at a time when government policy is encouraging the more effective use of land for agriculture. The impact on carbon sequestration provided by the farmland, meadows, mature trees, and hedgerows on this site cannot be offset by a nod to zero/low carbon energy production. The impact of this development on climate change is clearly negative as demonstrated in the sustainability appraisal. Moreover, as you are no doubt well aware Local Plans should include policies to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004. It is clear that this plan does not make sufficient effort to encourage mitigation of and adaptation to climate change. The Policy STR7 titled 'Climate Change' lacks urgency and bears no relationship to the Government's 'nearly zero' targets. It is important that TWBC's strategic commitment is clear and achievable. In policy STR/SS3 the requirement for renewable energy production should be specified as an item 'which will be delivered'. Instead, the renewable energy element of the policy is buried under 'high quality layout and design'. This is insufficient, given the scale of the climate emergency and the end date of the plan which corresponds closely with the Government's 2030 target for net zero. Given this relationship it is essential that large scale development in the Borough can aim to be a zero-carbon development. If this cannot be achieved on a new development site, then the TWBC target to achieve net zero emissions across the borough by 2030 is all but certain to fail. The failings of the largest strategic sites (which are fundamental to the overarching strategy of the Local Plan) to contribute adequately to the Government's 'nearly zero' 2030 targets, means that this Local Plan does not secure development and use of land which will contribute to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004.

D. It is not consistent with NPPF guidance.

You have chosen to accept the government's housing need for Tunbridge Wells Borough based on the standard method of calculation. Later ONS figures show a smaller housing need, and that policy may reflect that in due course. TWBC could protect this Parish from the destruction of Green Belt and the setting of the AONB by following NPPF guidelines, but this plan shows no interest in doing so, and in fact is planning for even more housing than required despite the MGB and AONB taking up such a large proportion of the Borough.

Paragraph 11 of the NPPF (2019) states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: (a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; (b) 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; 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." Paragraphs 11(b)(i) and (ii) are of crucial importance. They provide for TWBC to have a choice in the provision of the objectively assessed number of houses. **If provision of these houses is really only possible by sacrificing Green Belt land, as you concede at paragraph of the Non-Technical Summary of their Sustainability Appraisal, then the NPPF makes it perfectly possible for TWBC to say that this is not achievable. You have chosen not to do so.**

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As stated above you could substitute the much more sustainable and more deliverable site at Castle Hill and delete SS/STR 3. This in our view would be a more reliable route to deliver the bulk of the relevant housing requirement during the plan period..

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As the Parish Council representing the parish most heavily affected by this plan we should have the right to put the views of our parishioners whose views are overwhelmingly against this policy. Our view clearly has the support of our residents given the result of the recent Borough Council Election in Capel and the 'Vision For Capel' survey (part of a preparatory document for the Capel Neighbourhood Plan which is attached).

If you would like to attach a file in support of your comments, please upload it here. [VfC Document v11.2.pdf \(1\)](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_124a-z

Comment

Agent	Mr Douglas Bond [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woolf Bond Planning
Address	The Mitfords Basingstoke Road READING RG7 1AT
Consultee	[REDACTED]
Company / Organisation	Castle Hill Developments Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Castle Hill Developments Ltd [REDACTED]
Comment ID	PSLP_1932
Response Date	03/06/21 16:55
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	APP19C~1.PDF APP03S~1.PDF Castle Hill TWBC Reg 19 Reps June 2021 Written Statement (003).pdf APP08T~1.PDF APP13S~1.PDF APP06S~1.PDF APP14C~1.PDF APP02I~1.PDF APP11R~1.PDF APP07H~1.PDF APP15S~1.PDF APP21T~1.PDF APP16W~1.PDF APP01L~1.PDF APP17A~1.PDF APP09U~1.PDF

[APP14A~1.PDF](#)
[App 18 Castle Hill Masterplan.pdf](#)
[App 20 Castle Hill A21 Appraisal.pdf](#)
[APP121~1.PDF](#)
[APP14D~1.PDF](#)
[APP14E~1.PDF](#)
[APP04S~1.PDF](#)
[APP14B~1.PDF](#)
[APP11C~1.PDF](#)
[APP05C~1.PDF](#)
[APP10E~1.PDF](#)

Data inputter to enter their initials here KJ

Question 1

Respondent's Name and/or Organisation Castle Hill Developments Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: see full representation attached. Parts have been input into Policy STR1 (PSLP_1912), STR8 (PSLP_1922), STR9 (PSLP_1925), STR/RTW1 (PSLP_1929) and STR/SS3 (PSLP_1932). See also appendices attached]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our clients (Castle Hill Developments Ltd) control the land at Castle Hill that lies to the north of Tunbridge Wells. This site has been promoted through earlier stages in the Local Plan as an alternative location for strategic growth in the Borough, taking account of its significant credentials as a sustainable location for growth adjoining the extensive existing and committed facilities within Royal Tunbridge Wells town. In contrast to other locations, the development of new homes at the site will ensure the embedment of behaviour associated with the sustainable living unlike other locations in the Borough, especially the new community proposed at Tudeley Village.

1.2 An indicative masterplan for the development of Castle Hill is shown below. This relates to the land which has been promoted for residential development through the SHLAA (DPC7).

[TWBC: see full representation attached for Figure 1 – Indicative masterplan for delivery of around 900 homes and associated facilities at Castle Hill, Royal Tunbridge Wells]

1.3 Further to our submissions on earlier stages in the preparation of the Local Plan, the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing. Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing or committed infrastructure and services such as those at Castle Hill which adjoins the edge of the town of Royal Tunbridge Wells, the administrative and commercial heart of the borough and surrounding area with its extensive range of services and facilities including health, education, culture, leisure and employment. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.4 Have regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village with its replacement with an allocation at Castle Hill. For the reasons detailed in this submission, growth at Castle Hill due to its relationship with existing and committed development and facilities would result in achievement of sustainable development. Furthermore, the proximity of Castle Hill to services and facilities that residents will need to undertake their daily life ensures that sustainable behaviours are embedded in residents from initial occupation of the homes. This contrasts with that at Tudeley Village which due to the limitations in that local area will result in need for longer journeys to undertake daily lives, which are therefore likely to result in increased use of the car. Once this behaviour becomes the normal for residents in Tudeley, it will be harder to encourage them to switch to more sustainable alternatives once / if they become available.

1.5 The reports and documents submitted with this representation demonstrate the suitability of the approach advocated. As detailed in the representations, this land is not subject to constraints which would prevent its delivery for development at an early stage during the emerging plan period should this be confirmed through the examination of the Plan.

1.6 We also have several comments/representations on the policies within the Draft Submission Tunbridge Wells Borough Local Plan which should be addressed prior to its submission for examination by the Secretary of State.

1.7 In addition, as outlined in our representations to policy STR1, we have significant concerns that the authority has failed in its obligation to discharge the Duty to Co-operate under the Planning &

Compulsory Purchase Act 2004 (as amended), especially with respect of its engagement with other local authorities, especially Sevenoaks District and Tonbridge & Malling Borough.

1.8 As recognised by Inspector's examining other Local Plans (See paragraph 9 of the Inspector's Report into Examination of the Sevenoaks Local Plan (appendix 3) and paragraph 22 of the Letter from the Inspector's regarding the St Albans City & District Local Plan (appendix 13)), the failure to discharge the Duty to Co-operate cannot be rectified once the Plan has been submitted for examination and therefore it must be withdrawn. This is consequently our preferred solution to the Draft Plan as currently prepared.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1 Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of submissions on behalf of Castle Hill Development Ltd to the Council's Call for Sites in November 2019 (appendix 1)
- Copy of Inspector's assessment of the Tonbridge & Malling Local Plan (15th December 2020) (appendix 2)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (appendix 3)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (appendix 4)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (appendix 5)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (appendix 6)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (appendix 7)
- Tandridge LP Inspector's interim conclusions (11th December 2020) (appendix 8)
- Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (appendix 9)
- North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (appendix 10)
- Committee Report on planning application 19/02267/OUT – land east of Kingstanding Way, Tunbridge Wells (appendix 11)
- Decision Notice on application 19/02267/OUT (appendix 12)
- Examiners Report into the City & District of St Albans Local Plan (14th April 2020) (appendix 13)
- Report to Tonbridge & Malling Borough Council's Planning & Transportation Advisory Board of 17th May 2021 (including annexes and minutes) (appendix 14)
- Sevenoaks District Council's press release of 12th April 2021 regarding Local Plan (appendix 15)
- Inspector's Report into Examination of the West Dorset, Weymouth & Portland Local Plan (August 2015) (appendix 16)
- Advearse v Dorset Council [2020] EWHC 807 (Admin) (appendix 17)
- Castle Hill Masterplan (appendix 18)
- Overview Transport Strategy for Castle Hill, addressing transport principles and connectivity. Prepared by i Transport (appendix 19)
- Land at Castle Hill, Tunbridge Wells A21 Impact Appraisal. Prepared by i Transport (appendix 20)
- Land at Tudeley Village Sustainability Technical Note. Prepared by i Transport (appendix 21)

2.2 Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy

Objection

Policy STR8: Conserving and enhancing the natural, built, and historic environment

Objection

Policy STR9: Green Belt

Objection

Policy STR/RTW1: The Strategy for Royal Tunbridge Wells

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Omission site – Land at Castle Hill, Tunbridge Wells (DPC7) – failure to include as an allocation in policy STR/RTW1

Objection

The proposed change that is sought by the objector are:

1. The plan be withdrawn owing to the failure on Duty to Co-operate.

2. Changes sought to the Local Plan with respect of policy STR1.

A) Ensure that the plan period is 2020 to 2039.

B) That the housing requirement is increased to 14,364 dwellings;

C) That the 14ha of employment floorspace is clarified to reflect the assessed need for around 6ha of offices and 8ha of industrial/ warehousing space; and

D) That reference to a new garden settlement at Tudeley Village is removed from the plan.

E) Reference is made to an urban extension allocation at Castle Hill, North Tunbridge Wells.

3. Changes sought to the Local Plan with respect of policy STR8.

The Plan therefore as currently prepared in not sound with respect of:

a) It is not justified with respect of the inconsistency in consideration of landscape impacts between housing and employment sites in the AONB. The Plan includes major employment development in the AONB notwithstanding the clear availability of alternatives such as at Paddock Wood. The authority has not applied the same approach to housing; and b) It is also inconsistent with national policy in the approach to major development in paragraph 172 of the NPPF. This is clear, as indicated in the representation to policy STR1 that there is a clear need for additional housing in the Borough which consequently provides the justification for major development in the AONB, such as that proposed on our client's land at Castle Hill.

4. Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR8. The Plan therefore as currently prepared in not sound with respect of:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

To address these matters of soundness, a range of amendments are proposed. The proposed changes are:

That reference to Tudeley village is omitted from policy STR8, alongside consequential amendments to other parts of the plan i.e., the policies map to ensure that the Tudeley site is retained in the Green Belt.

5. Changes sought to the Local Plan with respect of the policy STR/RTW1

The Plan therefore as currently prepared in not sound with respect of:

a) Not positively prepared as the policy (alongside others in the document) fails to meet the areas housing needs, including a contribution towards unmet needs of neighbouring authorities,

b) Is not justified as the evidence does not support the exclusion of the Castle Hill site whereas other sites are included which are inconsistent with the assessments and appraisals of the Council; and c) The policy is not consistent with national policy as it fails to deliver sufficient housing to meet the Borough's needs, including that arising in neighbouring ones.

To address these matters of soundness, several amendments are proposed. The proposed changes are. That policy STR/RTW1 is amended to ensure that it acknowledges the allocation of Castle Hill as a development site with consequential amendments made to the document reflecting its identification.

6. Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3. The Plan therefore as currently prepared in not sound with respect of:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e., the policies map to ensure that the Tudeley site is retained in the Green Belt.

7. Castle Hill Omission Site: Change sought to the Local Plan.

To ensure that the local plan is sound, land at Castle Hill should be included as a residential allocation with consequential amendments to the settlement boundaries on the northern edge of Royal Tunbridge Wells.

3. OVERARCHING POSITION

3.1 We have a strong belief in the principle of the plan-led system and in setting out our representations upon these policies, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2 We have considerable experience and expertise in dealing with and realising development schemes similar to the Castle Hill proposal at Royal Tunbridge Wells through the development plan system having appeared at EIPs constantly over the last 30 years. These appearances have included representations on plan policy and the promotion of urban extensions in Surrey, Essex, Kent, Berkshire, West Sussex, East Sussex, Essex, Hertfordshire, Buckinghamshire, Devon, County Durham, Cambridgeshire, Hampshire and Oxfordshire. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3 Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4 In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. If the Borough's housing requirement was increased by the current capped requirement, this would result in the need for a further 678 dwellings in the Plan.

3.5 However, we contend that if, contrary to our evidence on the Duty to Cooperate obligation, the Inspector concludes Tunbridge Wells Borough has complied with the Duty to Co-operate, a contribution towards unmet housing needs in adjoining authorities should be made, then the Borough's housing requirement should be increased from 678dpa to 756dpa. This uplift together with an extended plan period, which reflects a robust period for examination of the draft Submission Local Plan, indicates that rather than requiring 12,204 dwellings from 2020 to 2038, this should be increased instead to 14,364 dwellings from 2020 to 2039. This is consequently an increase of 2,162 dwellings. On either basis, a proportion of these much needed additional homes could be delivered through the allocation of the land at Castle Hill, to the north of Royal Tunbridge Wells. A March 2039 plan end date would provide for 15 years after the 2023/24 monitoring period during which adoption could be realistic anticipated.

3.6 To address this requirement for additional homes, we contend that land north of Tunbridge Wells, at Castle Hill should be allocated for residential development (SHLAA ref DPC7). Following site analysis reflected in the submitted master plan, the Castle Hill site can accommodate 900 dwellings. As indicated in these representations and the supporting documents this would be a sustainable addition to the town.

3.7 The representations also highlight a failure of the plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of Castle Hill can also supply homes to resolve this issue. As detailed in the representations, the Castle Hill site would be a logical addition to the existing and committed development at north Royal Tunbridge Wells (Including the development approached east of Kingstanding Way (appendices 11 and 12)) and should consequently be included in the defined extent of the town, alongside its removal from the Green Belt.

3.8 We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the authority.

3.9 We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1 Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3 In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4 Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5 The Local Plan should seek to meet the Council’s full housing need. However, we have concerns regarding to the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the borough’s development needs.

4.6 For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7 These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government’s planning advice and policy. They also advocated changes to the extent of the defined settlement area of Royal Tunbridge Wells alongside consequential revisions to the Green Belt together with amendments to other policies of the plan.

4.8 These amendments would reflect our view of the clear sustainability advantages of growth at Castle Hill in preference to unsustainable locations where development conflicts with the approach of the NPPF i.e., Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9 Furthermore, to address the additional identified housing need, we advocate that land at Castle Hill, to the north of Royal Tunbridge Wells (DPC7) should be included as an additional allocation within draft policy STR/RTW1.

4.10 The remainder of this submission is focused on providing responses to the Council’s draft policies in the Local Plan.

9. POLICY STR/SS3: THE STRATEGY FOR TUDELEY VILLAGE

9.1 Through policy STR/SS3, the Council seeks to remove land from the Green Belt for the delivery of a new village at Tudeley.

9.2 For the reasons detailed below, we object to the proposal in that it entails the removal of very significant areas from the Green Belt for which there is no justification. This is with respect of the scale of housing development envisaged as detailed in the representation to policy STR9. As we do not consider that very special circumstances have been demonstrated, this is a further indication that no revision to the Green Belt should occur at Tudeley as detailed in the representation to policy STR9.

Sustainability of Tudeley village

9.3 Appendix 21 prepared by the client’s highway consultants examines the sustainability credentials of the Tudeley village (TV) proposal. Fundamental to the allocation is the delivery of a sustainable development using ‘garden village’ principles.

9.4 It is inescapable that TV is not in a site in a sustainable location, and that the combination of the scale of the scheme (for example TV would generate only 500 jobs for its ~6,750 residents), and the significant travel distances to higher order settlements which are well beyond walkable distances, will lead to an unsustainable development and increased car use compared to more sustainable solutions. The measures proposed will not make what is an unsustainable location, sustainable.

9.5 The assumptions in the Transport Assessment are significantly overly optimistic (in terms of traffic generation and trip containment of TV, and in relation to the success of modal shift measures). The traffic generation that TV will create beyond the garden settlement is significantly underestimated, and there are significant differences between the traffic generation of TV assumed in the SWECO TA (700 external trips) and the Stantec Assessment supporting the DL Masterplan Study (1200-2000 external trip). The proposed submitted local plan (PSLP) does not therefore provide for the infrastructure that will be needed to soundly support the proposal.

9.6 Indeed, the only means by which the PSLP Transport Assessment has managed to conclude that the PSLP is sound is by applying a universal reduction in traffic flows (of 10%) across the entire network and greater still reductions in Tunbridge Wells, TV and Paddock Wood (15%), on the basis of what in real terms is limited investment in sustainable travel measures. The majority of the planned investment is focussed on the Strategic Sites and will do little if anything to create what is a very significant change in behaviour of general traffic patterns on the wider network. This is unrealistic and not supported by the limited evidence base.

9.7 TV really falls between stalls; it is not far enough away from key service centres (i.e. Tonbridge and Royal Tunbridge Wells) that TV residents will be disincentivised from obtaining their services in the higher order settlements; is not of sufficient scale to meaningfully deliver many everyday needs can be properly addressed internally to the site; and is not close enough to the higher order settlements to make sustainable travel options realistic for many. It risks creating a car dominated development area, contrary to the Vision and does not demonstrate the high levels of connectivity and containment that the PSLP seeks.

9.8 Furthermore, there are a series of disconnections between the evidence base and policy requirements, as well as significant delivery risks to key infrastructure:

- The SWECO Transport Assessment identifies that the A228 Colts Hill Bypass and Five Oak Green bypass are required – it did not test any other options. Yet the PSLP identifies a reduced scheme for A228 Colts Hill. There is no evidence to demonstrate this will be successful. The DL Masterplan Study goes further to assume that if TV comes forward in isolation, the A228 improvements may not even be needed. There is no published evidence to show how this conclusion has been reached. • No assessment has been carried out to determine the point in development at TV that the A228 improvements and Five Oak Green Bypass are needed, and the PSLP does not secure their ultimate delivery, simply deferring to the payment of contributions. There is no guarantee that there will be sufficient funding to deliver the works, that the schemes are deliverable, or that the council will receive funding in a timely and coordinated manner to allow the schemes to be delivered when they are needed.
- The PSLP advocates the accessibility of TV to higher order settlements by walking and cycling. In practical terms, this is simply not feasible for many people to achieve the distances required on a regular basis. Moreover the PSLP does not identify in detail how any connections will be formed. The Walking and Cycling Strategy advocates use of private tracks, countryside links and rights of way. Such routes will not offer attractive, accessible and convenient routes which have a real prospect of attracting regular users. • TV is reliant on three separate improvements to crossings of the mainline rail network. No evidence has been presented to demonstrate that these connections can actually be achieved, or that Network Rail are supportive of the schemes. The viability assessment does not demonstrate how NR expected consideration / compensation has been factored into the estimates, which may be significant sums. • TV is also reliant on various schemes which require third party land / and/or where no feasibility work has been presented, including Five Oak Green Bypass (in third party ownership), the B2017 widening (where no scheme or assessment is presented) and at A228 Colts Hill. The PSLP does not identify how these schemes will be delivered and instead seeks simple contributions from TV to their delivery. The viability assessment did not include allowances for land costs. There is a significant risk that essential infrastructure will not be delivered. • The PSLP identifies in its vision that TV will deliver high frequency / Rapid bus connections, yet the frequencies assumed offer nowhere near this level of service and will not offer the 'turn-up-and-go style service that would stand any chance of attracting significant trips away from car based travel. The viability assessment has assumed a bus service contribution of £3m across TV and Paddock Wood. This will be wholly

inadequate to provide the service levels needed to achieve the laudable sustainability aspirations, and will ultimately expire, leaving a very real prospect that services will not be available at any sort of attractive frequency in the longer term. • The only locational advantage of TV is its placement on the mainline rail network. Despite this, and contrary to the NPPF, the PSLP does not require a rail connection to be formed and provides only tepid aspirations that this may be considered later. If the connection is not planned and required at the start, it will not be delivered. The lack of rail connectivity, alongside the limited public transport on offer and the prohibitive distances from TV to higher-order centres will result in unsustainable development and will not achieve the PSLP Vision.

9.9 The key impacts of this approach are likely to be:

- A development that will not achieve the high aspirations for containment and sustainability, leading to significant car-based travel demand outside of TV.
- Car dominated patterns of travel between TV and higher order settlements (Tonbridge, Paddock Wood and Royal Tunbridge Wells). The lack of realistic alternatives to car travel will not create the aspired transport behaviour.
- A significant underestimation of traffic generation of TV and overestimation of the success of travel planning measures in the wider district, undermining the evidence base.
- A demand for significant further highway interventions to accommodate the development demands.

9.10 On this basis, the allocation of TV is not sound, is not sustainable, is not supported by adequate and robust evidence to demonstrate that the scheme can be achieved without significant unreported impacts and that it will be accompanied by the necessary mitigation measures at the right time.

9.11 The KCC concerns raised in relation to TV at the Reg 18 stage, have not been addressed in the PSLP.

Infrastructure

9.12 As noted in the SA, to enable the delivery of Tudeley, significant infrastructure improvements will be required. This includes:

- Colts Hill - £20m includes, £8m of which for TV
- Five Oak Green Bypass - £9m, all on TV
- Rail Tunnel - £20m on TV
- All modes rail bridge - £10m on TV
- Ped Cycle rail bridge - £3.5m on TV
- Widening of B2017 (to Tonbridge) - £3.1m
- Bus route subsidy - £3m, of which £1.5m on TV
- Travel Plan - £1.25m

9.13 Additional infrastructure to serve the site will include utility services, education, community, health and leisure facilities. For these factors, no indication has been provided in the current Draft Infrastructure Delivery Plan of the costs or delivery mechanism of these significant and also essential infrastructure investments. Without this information there is no certainty that the Plan can be delivered and consequently would be effective.

9.14 The Plans prepared by both Uttlesford Council (appendix 9) and the North Essex Authorities (appendix 10) failed with respect of some of the new settlements envisaged as the costs assumed were unrealistic and did not include sufficient contingency. The Tandridge Local Plan Inspector has significant doubts with respect of the uncertainty of funding the major new road infrastructure associated with the South Godstone Garden Village, following a rejected HIF bid (appendix 8).

9.15 Although the Council has prepared information with respect of costs and delivery mechanisms for Tudeley, as indicated earlier in this submission, the new settlement is not expected to contribute towards all the necessary infrastructure i.e. the Colts Hill off-line improvement (This is only included in the financial appraisals for development at Paddock Wood) which is required alongside the Five Oak Green bypass (which Tudeley is expected to contribute towards) (See the Viability assessment schedules in Appendix II of the Stage 2 Viability Appraisal). Furthermore, notwithstanding the financial viability assessments not including all infrastructure, development at Tudeley is not as viable as indicated under the same range of variables as other schemes. Tudeley is reliant on lower existing land values and higher property values to show it is viable. The limited evidence that development at Tudeley is viable is a further indication of the unsuitability and soundness of the current strategy.

Conclusion

9.16 Exceptional circumstances do not exist for the removal of Tudeley village. Whilst a matter of planning judgement, the Council cannot therefore make such a judgement as this would not be consistent with their statutory duty (section 39(2)) and the revised NPPF. The points raised above confirm that exceptional circumstances do not exist, are not soundly based and therefore do not support revisions to the Green Belt at Tudeley Village.

11. OVERALL CONCLUSIONS

11.1 The representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

11.2 As indicated in the representations, the Plan as currently prepared does not comply with the Duty to Co-operate through a failure to effectively consider how unmet housing needs of neighbouring authorities, especially Sevenoaks District, is to be addressed. The authority has not actively engaged with Sevenoaks and like Tonbridge & Malling (whose plan has also been found to fail the Duty) it is clear that the approach of Tunbridge Wells is insufficient in respect of their legal obligations. The plan also fails under Duty to Co-operate given the significant cross-boundary impacts that arise from Tudeley on neighbouring Tonbridge & Malling. The plan should consequently be withdrawn, and the authority tasked with demonstrating compliance with the Duty to Co-operate obligation including how best to address housing need in the wider area.

11.3 The plan should consequently be withdrawn, and the authority tasked with demonstrating compliance with the duty.

11.4 Irrespective of the failure to comply with the Duty to Co-operate, the plan is not sound with respect of:

a) It is not positively prepared as it does not seek to address the borough's housing needs, therefore further sites should be allocated;b) It fails to allocate land at Castle Hill that has been demonstrated to be a suitable, available and deliverable site that can contribute in a sustainable way to meeting the Council's and wider area's housing needs;c) It is not positively prepared as it fails to boost the supply of housing by seeking to address the uncapped housing need derived through local housing need. This failure is compounded by the lack of identification of further sites to contribute towards addressing unmet need of neighbouring authorities;d) It is not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document;e) It is not justified with respect of the inclusion of land at Tudeley Village to which we object;f) Is not justified in detailing the split in employment needs between offices and industrial/warehousing space; and
g) It is also inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraph 60 of the NPPF.

11.5. These matters can consequently be addressed through Main Modifications to the plan allowing for a Sound Plan.

11.5 To address these matters of soundness, several amendments are proposed. The proposed changes are.

That policy STR1 is amended to:

A) Ensure that the plan period is 2020 to 2039.B) That the housing requirement is increased to 14,364 dwellings;C) That the 14ha of employment floorspace is clarified to reflect the assessed need for around 6ha of offices and 8ha of industrial/ warehousing space; andD) That reference to a new garden settlement at Tudeley Village is removed from the plan.E) Reference is made to an urban extension allocation at Castle Hill, North Tunbridge Wells.

12. FINAL REMARKS

12.1 We trust the above comments are of assistance in preparing the next iteration of the Local Plan and await confirmation of receipt of our representations in due course.

12.2 We welcome the opportunity to open up dialogue with the Council in order to further proposals which would result in the changes advocated, including the allocation of our clients' land.

12.3 Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Secretary of State, the publication of the Inspector's Report into the Examination of the Plan together with the adoption of the Local Plan.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3.

3.25 The Plan therefore as currently prepared in not sound with respect of:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

3.26 To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

1. That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e., the policies map to ensure that the Tudeley site is retained in the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To assist the Inspector and examination on Duty to Cooperate and issues of soundness that require verbal submissions in response to Matters and Issues to be identified by the Inspector.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Bernadette Cawley [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Bernadette Cawley [REDACTED]
Comment ID	PSLP_1107
Response Date	02/06/21 15:19
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Bernadette Cawley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Since the website is extremely difficult to navigate, I am enclosing my views as a Word Document and hope that the Planning Department are able to include these views in the consultation responses, as the website set up seems not to work well.

Introduction - I am a regular visitor to Tudeley and have been so for over 26 years, visiting family who live just outside Tudeley village, in the country. They will be directly affected by what is proposed and the consequences.

I am aware that my grown up nieces cannot afford to buy houses locally, as the market is well out of reach of those on even medium income salaries.

I have experienced the **traffic volumes** currently on the B2017 and the idea of adding yet more is horrific. Not only will more housing **increase the traffic, pollution and noise on the B road, it is counter to government policy to reduce emissions** [The Climate Change Act 2008 (2050 Target Amendment) Order 2019] not only from the vehicles needed to build the proposed homes over a prolonged period of time, but then also from the people who are expected to live in that housing. Either way, this is not in line with current government policy. I will expand on this below at paragraph 1[1]

Climate change

Local Plans should include policies to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004. It is clear that this plan does not make sufficient effort to encourage mitigation of and adaptation to climate change. The Policy STR7 titled 'Climate Change' lacks urgency and bears no relationship to the Government's 'nearly zero' targets. It is important that TWBC's strategic commitment is clear and achievable.

In policy STR/SS3 (The Strategy for Tudeley Village) the requirement for renewable energy production should be specified as an item 'which will be delivered'. Instead the renewable energy element of the policy is buried under 'high quality layout and design'. This is insufficient, given the scale of the climate emergency and the end date of the plan which corresponds closely with the Government's 2030 target for net zero. Given this relationship it is essential that large scale development in the Borough can aim to be a zero-carbon development. If this cannot be achieved on a new development site, then the TWBC target to achieve net zero emissions across the borough by 2030 is all but certain to fail. The failings of the largest strategic sites (which are fundamental to the overarching strategy of the Local Plan) to contribute adequately to the Government's 'nearly zero' 2030 targets, means that this Local Plan does not secure development and use of land which will contribute to the mitigation of, and adaptation to, climate change consistent with

S19 (1A) of the Planning and Compulsory Purchase Act 2004.

The village of Tudeley is precisely that – a village “a group of houses and associated buildings, larger than a hamlet and **smaller than a town, situated in a rural area**”. The proposal would entirely change the nature of the village into a town, but one without infrastructure. Tudeley is not the right place for the level of housing proposed. It is a small village and the imposition of thousands of houses would have a grave impact on the lives of the people there.

The people coming to live in the proposed houses will expect to gravitate to Tonbridge for their education, health and shopping needs, as it is far closer than Tunbridge Wells. But there are **no proposals** to address these resulting shortages, in education, health or transport. It has absolutely **no infrastructure, and none is proposed**. Effectively what is proposed is a large estate with no connections, no transport and utterly requiring the use of cars (see paragraphs 1 & 3 below)

For me the overriding reason not to build at Tudeley is that the area identified for development **floods**. I have seen this on numerous occasions for myself. The land is on a **flood plain**. To build there is a monumental error, other than the developer taking the receipts and leaving the people with the flood problems and the risk of never being able to purchase home insurance.[2] This will create massive problems for the householders and much misery.

The land identified is in the **Green Belt, and is active productive farmland**.

There are 4 houses at Bank Farm Cottages which will be in the middle of the proposed development. Those householders were not made aware of the plans originally, they have asked for the incorrect information in the original consultation to be rectified to show their ownership of those houses, which was not done, they have received no individual notifications from TWDC about these proposals, all of which indicates that their interests as residents are not being considered and **the process is flawed**.

I will address both of these issues at paragraph 2 & 10[3]

DETAILED RESPONSE

- 1 The huge amount of documentation issued by TWBC does not include any specific named document on Climate Change, recognised by government as a requirement in planning.[4]
“Effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.

In addition to the statutory requirement to take the Framework into account in the preparation of Local Plans, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.”

I have read the documents published, which purport to generally address some of these issues, but in reality woefully fail to consider the impact on the countryside, the village and its inhabitants of building so many houses on Green Belt land, which was so designated for a purpose, to ensure that it remained green, for the benefit of the people, both near and far. Significantly the Glossary does not mention “Climate Change” or the Climate Change Act at all.

The Sustainability Appraisal at page 10 of the Local Development Scheme equally omits any mention of either. This means that the Scheme does not directly, or in my view indirectly, address the Council's climate change obligations, which means it is seriously deficient as a document, and one that no local authority could reasonably adopt or approve. In fact the Plan contradicts the TWBC's own Environmental policy to achieve Carbon Reduction targets. To fail to mention the 2008 Act, and also to fail to mention the local authority's duties under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires local planning authorities to include in their Local Plans “policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change”. Government makes clear that “This will be a consideration when a Local Plan is examined”. [5]

- 1 The 5 main purposes of the Green Belt in the National Planning Policy Framework are :
 - . **To check the unrestricted sprawl of large built up areas**
 - . **To prevent neighbouring towns merging into one another**

- . **To assist in saving the countryside from encroachment**
 - . To preserve the setting and special character of historic towns
 - . **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**
- 1 Regarding the **unrestricted sprawl**, what is being proposed will have the effect of joining Tonbridge to Paddock Wood via Tudeley and East Capel, **neighbouring areas merging into one another**. Exactly the kind of urban sprawl the Green Belt was created to ensure does not happen.
 - 1 The proposed development is utterly out of kilter with local needs. The physical factors which the local people will have to endure are noise, vibration, small, fumes, smoke and artificial lighting, as well as the discharge on to their properties of any solid or liquid substance. The plans do not mention the additional traffic which will be generated, the noise from the plant and generating equipment, the odour and dust problems, the light pollution, over a proposed 15 year period. Tudeley village is a rural place and is constrained with limited capacity to develop services and infrastructure to support such significant development. The roads already struggle to cope with present traffic, and would be much more impassable with more development.
 - 1 Regarding **saving the countryside from encroachment**, in 2016 the Inspector considering the Site Allocation Local Plan said "I do not accept a need to allocate any land currently in the Green Belt" and "I have not recommended that any land within the Green Belt should be allocated". The situation regarding the need to safeguard green spaces has not changed, indeed it has grown. Climate change and the safety of our green resources is now even more important.
 - 1 Regarding the encroachment of the countryside, in order to develop in the Green Belt "very special circumstances" are needed to be proven to outweigh the harm caused. Other than 'we need to build houses' TWBC have not shown what the special circumstances are, and proven they exist. Circular 42/55 from 3 August 1955 set out the original Green Belt policy: *"Inside a Green Belt, approval should not be given, except in very special circumstances for the construction of new buildings or for the change of use of existing buildings for purposes other than agriculture, sport, cemeteries, institutions standing in extensive grounds, and other uses appropriate to a rural area."* The successor to Circular 42/55, The National Planning Policy Framework (19 February 2019) (NPPF), has the Green Belt still entrenched in policy and on a similar basis *"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (Paragraph 133 NPPF).*
 - 1 As recently as 5th February 2020 Lord Carnwath in the Supreme Court [6] stated *"Key features of development control in Green Belts are the concepts of "appropriate" and "inappropriate" development, and the need in the latter case to show "very special circumstances" to justify the grant of planning permission. In R (Lee Valley Regional Park Authority) v Epping Forest District Council [2016] EWCA Civ 404; [2016] Env LR 30 ("the Lee Valley case"), Lindblom LJ explained their relationship:*
"18. A fundamental principle in national policy for the Green Belt, unchanged from PPG2 to the NPPF, is that the construction of new buildings in the Green Belt is 'inappropriate' development and should not be approved except in 'very special circumstances', unless the proposal is within one of the specified categories of exception in the 'closed lists' in paras 89 and 90.... The distinction between development that is 'inappropriate' in the Green Belt and development that is not 'inappropriate' (ie appropriate) governs the approach a decision-maker must take in determining an application for planning permission. 'Inappropriate development' in the Green Belt is development 'by definition, harmful' to the Green Belt - harmful because it is there - whereas development in the excepted categories in paras 89 and 90 of the NPPF is not. ..."
 - 1 *These concepts are expressly preserved in the policies for the control of development set out in paras 87ff of the NPPF:*
"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
... 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." (paras 87-88)"
- Nowhere in the vast array of documents on the TWBC website is any document headed "very special circumstances". There is a definition section saying an inadequate definition of Green Belt, but no single document explaining explicitly what the very special circumstances are which justify this

redesignation of the Green Belt land at Tudeley. TWBC have cited reasons for not allocating houses at other, alternative, sites (including that at Castle Hill) – but disregard such reasons when selecting CA1 (Tudeley) for a Garden Village. They justify a single land-owner as being the reason for the special circumstances. And state Castle Hill is a multi-land-owner site (which it is not). Lazy Planning is not a reason for Very Special Circumstances. No alternative creation of Green Belt is planned by TWBC in mitigation to the reclassified Green Belt to be lost.

- 1 With regard to urban regeneration, this is woefully not addressed in the documentation. One would think there were no brownfield sites at all in the Tunbridge Wells area – this has clearly **not** been a priority for the Council. There has been an inadequate analysis of brownfield sites such as Castle Hill, Blantyre and of vacant offices in Tunbridge Wells itself. A Google search by me today indicates there are at least 38 offices available in Tunbridge Wells and I dare say more would be available if I spent time canvassing local estate agents. This whole availability of brownfield sites is available on digital-land.github.io (via www.gov.uk) shows 41 sites on the Tunbridge Wells BC area. This is not addressed in any significant way in the documentation currently available for consultation. This deficiency shows that inadequate consideration has been given to this issue – a failing of a duty and a flaw in the process. No reasonable Council can or should adopt a plan with such ineffective analysis.

1 **Flooding**

I have seen for myself the fields flooded, over a number of fields. The 48,000 homes affected by the 2007 floods cost, on average, between £20,000 to £30,000 to repair while the cost to the economy was £3.2bn. About 30% of householders had to move out while repairs were carried out, with 1 in 10 displaced for more than a year, creating huge disruption to home life - source The Environment Agency Report – The Costs of the Summer 2007 Floods in England, available at www.gov.uk. “The flooding in 2015/16 was estimated to cost the economy £1.6bn. The flooding in 2019/20 was estimated to be £78m”, again on www.gov.uk from the Environment Agency.

1 **Flawed Process**

This process has been flawed from the beginning. The residents of Tudeley were not notified individually about the plans of TWBC which if passed will impact immensely on their quiet enjoyment of their homes. During the Regulation 19 consultation, 97% of the respondents opposed the plans. The response from TWBC was not to address the concerns expressed but, to add insult to injury, added in hundreds of more dwellings to Capel parish, thereby not allowing the residents of those dwellings to be able to respond to the Regulation 18 consultation. By any legal test, this has disadvantaged those people. But that is not the only procedural flaw. The website which is supposed to attract responses to this plan is extremely difficult to make work, as if designed to NOT allow responses. I have used a computer since 1998, and consider myself a competent amateur, but that website would not allow me to insert my comments, hence this submission being by post.

The 1985 Gunning case[7] set out the principles for a fair and proper consultation exercise :

- . That consultation must be at a time when proposals are at a formative stage
 - . That the proposer must give sufficient reasons for any proposal to permit of intelligent consideration & response
 - . That adequate time is given for consideration and response
 - . That the product of consultation is conscientiously taken into account when finalising the decision.
- These principles have been reaffirmed as lately as November 2020 in the Court of Appeal[8] and therefore remain requirements.

One of the pre-requisites of the above is that information provided by the public authority involved is accurate. TWBC were informed by residents at Bank Farm Cottages that the Regulation 19 consultation information provided was accurate in that it stated that the land their houses are on was owned by the proposed developer. That was inaccurate and could have been checked with the Land Registry. Not only did TWBC not check ownership of the land (and thereby identify people entitled as of right to be consulted on the proposals) but when told of the correct information, declined to alter their own information, thereby continuing the misleading information for that consultation. It is hard for people to give “intelligent consideration & response” when the information provided is just plain wrong.

I don't believe that there are sufficient reasons set out for the proposals to build thousands of houses on Green Belt land. TWBC have not entered into this consultation ‘with clean hands’ by the way that they did not inform residents about their plans directly, did not alter their information when told it was inaccurate, and added in additional houses to Capel parish without giving those residents the opportunity to make their own representations.

Section 61W of the 1990 Town & Country Planning Act requires a prospective developer to “publicise the proposed application in such manner asis likely to bring the proposed application to the attention of a majority of the persons who live at, or otherwise occupy premises in the vicinity of the land.” Since the residents of Bank Farm Cottages who live at and in the vicinity of the land received no such information from the developer, the developer failed in his statutory duty, which **MUST** affect the legitimacy of his proposals and should be taken into account by TWBC and the Inspector when considering the future of this plan.

TWBC has not fulfilled its duty to co-operate under section 111 of the Localism Act 2011. The duty:

- . relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
- . requires that councils set out planning policies to address such issues
- . requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
- . requires councils to consider joint approaches to plan making.

TWBC launched into planning the development affecting Tudeley without consulting Tonbridge and Mailing Council, which is the area most likely to pick up the infrastructure problems, until eventually it had to. It has in no way engaged constructively to develop strategic policies, at every turn being dismissive of accurate information and not engaging truly in proper consultation.

CONCLUSION

To go back to the issues listed in Question 4, my responses address the issues

Issue

My response

Local Plan as proposed is **legally compliant**,

Paragraphs 1, 2, 5, 6, 8, 9, 10

Sound

Paragraphs 1, 2, 3, 4, 7, 8, 10

Complies with the duty to co-operate

Paragraph 10

The plan is not positively prepared

Paragraph 10

The plan is not effective

Paragraphs 2, 3, 8, 9

The plan is not justified

Paragraphs 4, 5, 6, 8

The plan is not consistent with national policy

Paragraphs 1, 2, 3, 5, 6, 8, 9, 10

[1] Paragraph 1 below

[2] The 48,000 homes affected by the 2007 floods cost the economy £3.2bn - source The Environment Agency Report – The Costs of the Summer 2007 Floods in England, available at www.gov.uk

[3] Green Belt & flawed process

[4] Climate Change Guidance 2019 – www.gov.uk

[5] Climate Change Guidance at www.gov.uk

[6] Lord Carnwath in R(Samuel Smith Old Brewery (Tadcaster) & others v North Yorkshire County Council (2020) UKSC 3

[7] R v London Borough of Brent ex parts Gunning [1985] LGR 168

[8] R (On the application of) v Secretary of State for Education [2020] EWCA Civ 1577

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is necessary for me to attend so that the Inspector hears from people other than locals about the wider impact and consequences of what is being proposed.

Comment

Consultee	R G Cazalet ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	R G Cazalet ([REDACTED])
Comment ID	PSLP_1676
Response Date	04/06/21 16:32
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Rosemary Cazalet
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I wish to comment on STR/SS3 and also STR/SS1

We have lived in North Tonbridge for 38 years, worked locally and educated two children in local schools. Obviously there have been many changes in the town and surrounding area over the years but nothing so drastic as the proposed developments in the Tudeley and Capel area. These, to me, seem insensitive on many levels and possibly unnecessary if TWBC recheck some of their data which may not be as up to date as it could be. There does seem to be a cynical element to this proposal sited as it is so near the borough boundary, with the obvious local amenities and the station being situated in Tonbridge rather than Tunbridge Wells who will collect the Council Tax but be relieved of the burden of the extra population and traffic.

Creating a garden settlement at Tudeley of 2,100 dwellings together with a further 2,100 at Capel will cause immense harm to residents of the Parish of Capel and to residents of Tonbridge. There will be a significant increase in traffic into Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road and generally in Tonbridge every morning.

People living in Tudeley will use Tonbridge Station for commuting and Tonbridge town services creating parking issues. The increase in traffic may be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period.

Paras 5.210 and 5.217. Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. Many will have to travel for work, school etc even if many 'day-to-day requirements' can be met on site as stated. It is unrealistic to label local roads as pedestrian/cycle routes as shown on your maps due to narrowness, bends and increased traffic. Even with completely separate cycling provision cycling is likely to be within the proposed new development rather than for school, work journeys.

The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will

make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. Surely we should be learning from the flooding in Yorkshire in 2019. There will be an increase in air, light and noise pollution that will spread across the boundary into Tonbridge & Malling and create a visual scar across the landscape as the area is visible for many miles. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows). We have, over the years, had many adult language students staying here all of whom have been taken to see the Chagall windows as well as for country walks in the area with which they have been impressed.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

Para 4.125 I do not agree that 'there are exceptional circumstances' which justify the removal of land at Tudeley and East Capel from the Green Belt.

I believe that housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan. TWBC is already providing more than their housing need figure in the draft Local Plan.

Para 4.52. The difference in the Local Plan allocations between Paddock Wood/Capel/Tudeley and Tunbridge Wells/Southborough/Bidborough is startling. Surely Tunbridge Wells has more capacity for expansion? Since Covid 19 work patterns have changed, office space may now be available for conversion.

The proposed Tudeley Village has been referred to as securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that you intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans. I think that TWBC want to fill Tudeley and East Capel with housing until they coalesce with Tonbridge to the West and Paddock Wood to the East, ultimately creating a massive conurbation that will dwarf Tunbridge Wells town centre. TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley and East Capel are unsustainable and place huge pressure on Tonbridge. Will they actually meet TWBC's housing need which to me suggests the need of local people to find housing in the area. I suspect that this type of development is likely to be too expensive for many local people including some of the carers I currently have contact with. and is more likely to encourage commuters wishing to move from London and thus to need road and rail transport from Tonbridge.

I object to the inclusion of land in East Capel in "The Strategy for Paddock Wood" (STR/SS1)

This land is Green Belt land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel. The comment above about coalescence and the creation of a conurbation from Paddock Wood right across to Tonbridge is very relevant here, as is the land's use as a flood plain. Building here, even with flood risk mitigation and "betterment" could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the impact of climate change. As the current flooding elsewhere shows there is a lot to be learnt about the causes and the prevention of flooding and about how actions in one area can have serious effects elsewhere. This surely should, at present, be a very strong argument against building on any area of flood plain.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Peter Chapman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Peter Chapman [REDACTED]
Comment ID	PSLP_62
Response Date	04/05/21 09:57
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	peter chapman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 S Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in this area all my life. Tudeley /Capel is a small rural community of around 900 homes, consisting mainly of apple orchards, and sheep and cow grazing. It is an Area of Natural beauty- concreting it over is NOT the future in a post-covid world. The local residents are universally opposed to a huge "New town" being inflicted upon them, increasing the local population by six times over. There are no roads, and no room to build roads. There is no infrastructure whatsoever. Just plonking a huge new town in the middle of the vountryside.

There are not the shops, trains, buses, roads , Doctors, dentists, schools to cope with such a huge population explosion.

Green Belt is Green belt – needing more housing is NOT a special circumstance to concrete over Green belt- it will turn the are into one long urban sprawl from Tonbridge through to Padock wood.

TWBC want to inflict a gigantic "New town" the size of Monaco smack bang in a section of Greenbelt. NO ONE wants this grotesque scheme except the leader of TWBC, his planning officer, and the rich land owner who will make a fortune from selling his fields. I have not spoken to a single other person who thinks this is a good idea. This is such lazy planning- rather than find smaller, more suitable brownfield sites they have plonked for one easy huge site. Lazy lazy lazy.

Post covid there will be many empty warehouses, shops, factories that will never reopen post covid- look there first surely?

Having grown up here, I know from experience that this are floods badly. If an area the size of Monaco is concreted over where will future rain water run off to?

My family have enjoyed growing up here, in this rural, beautiful part of Kent. We enjoy the many walks the area offers. My children are keen to get on the property ladder but they too are horrified with new homes/affordable homes being in such huge numbers in an area they love being destroyed. Locals will in no way benefit- these new houses will attract people from LONDON NOT locals- many will commute back to London every day.

My children understand the need for more housing but they agree a huge new town just slapped on pristine green fields in Tudeley is not the future in a post covid world. Local residents will benefit in no way from this monstrous development. They will suffer DECADES of construction noise, traffic, dust, mess, hugely damaging their quality of life they cherish.

The Tudeley development is completely unsustainable.

*There is no railway station (nor ever will be) It will be totally car- centric however many bus /cycle lanes TWBC say they will be build. These will be expensive home- every family will have at least two cars, pouring out towards already gridlocked Tonbridge every morning. The B2017 into Tonbridge already backed up in rush hour every day. It is a pipe dream for TWBC to say that all these thousand

of new residents will cycle to work school on a rainy cold January morning. This will just NOT happen. Tonbridge station is already packed to capacity in normal non-covid times.

* The proposed huge Tudeley development is in the middle of nowhere- there is no infrastructure in place- The sewerage /water supply requires major upgrading. The electricity supply will need upgrading. All at a cost of tens of millions of pounds.

*Local roads are little more than country lanes- TWBC propose new roads- which may not be built for many years/decades- in the meantime thousands of cars with no where to go apart from gridlocked Tonbridge, a medieval market town that cannot be extended with new roads- there is no space. Any new road into Tonbridge has no where to go- it will just jam up close to Tonbridge as it does now- this problem cannot be solved- this is the WRONG place for a huge new housing development.

Tonbridge Borough council were only consulted late in the planning process. This development lies right on the edge of Tonbridge. Tunbridge Wells residents will be totally unaffected by thousands of new homes whilst Tonbridge residents will suffer gridlock- packed roads, no town parking, packed trains into London. A huge development on the edge of Tonbridge is crazy! Very poor engagement with local residents and local council. (Tonbridge)

If the development is built a new road bypassing Five Oak green is proposed- This will carve a hideous dual carriage way across yet MORE Green belt- these beautiful fields are currently used for farming and grazing.

Air quality will suffer hugely- thousands of cars in use every day, thousands of central heating boilers, all polluting daily- sustainable???

Democracy?? TWBC are determined to ram this grotesque scheme through- They have totally ignored the opinions of local residents whose lives will be ruined/changed for decades to come. They did not consult with Tonbridge Borough Council until late in the planning process. Tonbridge Council are alarmed how their town will be over whelmed.

TWBC refuse to consider more suitable area to develop such as Castle Hill- much of the infrastructure is already there- particularly roads.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	SallyAnne Clark [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	SallyAnne Clark [REDACTED]
Comment ID	PSLP_215
Response Date	19/05/21 13:20
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	SallyAnne Clark
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been resident in Five Oak Green for 17 years, and spend a lot of time walking in my local area. The proposal for a new garden village at Tudeley is not sound.

- 1 It will destroy valuable green belt land that is currently used for agriculture. We should plan to grow as much of our own food as possible. Once food growing space is used for housing, it never comes back.
- 2 It is in the wrong place: on the edge of Tunbridge Wells borough, but close to Tonbridge, which will see all the increased demands on resources. The local roads are not adequate, and TWBC has not planned properly in that they have not yet asked local landowners on their views for roads being built across their land, and no infrastructure analysis has been carried out.
- 3 Flooding in this area has improved in recent years, but will deteriorate if absorbent fields are concreted over. If you walk through the proposed area for development, you will find metal posts next to the public footpaths, and these contain plumb-lines down to the water level below. I often look at these on my walks. See how close to the surface the water level is for most of the year, and you will see how disastrous this housing development would be in terms of flood risk.
- 4 It is a disproportionate load on a small rural parish.
- 5 A housing development will lead to Tarmac taking up its options for gravel removal at Moat Farm, which will destroy even more of the local landscape. They are currently waiting to see if there have a near market for the building material. See also point 1 above in relation to this.
- 6 The plan is not sound in terms of all the extra utilities that would be required in the middle of the countryside, where there is currently very little. Millions of pounds will be needed for new sewerage, gas, electric, telecoms, drainage, etc. but TWBC have only put a fraction of the money required into the project budget, so it has not been thought through adequately.
- 7 The number of houses being built does not match the projected figure for local growth. The Office for National Statistics project only 5% growth for this area, but TWBC have used an out of date 2014 algorithm instead. Currently, 80% of local house purchases are made by people who live outside the area, so what we will be doing is building houses for other boroughs, so that they don't have to. This is not only unfair, but makes no sense. I have had a good opportunity to study what happens when a house goes up for sale here- it takes a long time to sell, because there is a limited market locally, in each house-type bracket. However, developers will market the new village all over the South-East.
- 8 The plan is not sound as it is not consistent with either the TWBC own sustainability objectives, or the effects of climate change. There will be loss of trees and wildlife, and more roads, noise and pollution. Railtrack have stated they will not build a rail junction there, so there will be people driving into Tonbridge to go to the station and commute back up to London. TWBC talks about electric cars and bikes, but these are out of the range of most people by reason of cost, and will be for many years yet. All the time a petrol car is cheaper than electric, people will use them.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 TWBC should reconsider how the actual projected local growth could be catered for across the borough, to reduce the effect of building in just one place. This would be more effective in terms of cost, as local services such as sewerage, water, drainage, gas, electric, and telecoms may be able to cope with a small increase in demand and therefore will not need to be replaced.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The project for a new garden village does not comply with TWBC's own sustainability objectives, as listed in table 6 on page 36 of the Sustainability Appraisal.

Also, the scores given for 'services and facilities' are high, which does not make sense. There are no facilities or services in the middle of the countryside - new sewers, drainage, gas, electric, telecoms, water supply, flood protection, as well as new roads will be required. Railtrack have stated that there will not be a station there, and the development is not big enough to warrant a supermarket.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Cobell [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Cobell [REDACTED]
Comment ID	PSLP_137
Response Date	26/05/21 20:51
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	David Cobell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My name is David Cobell and I have lived in Five Oak Green since 1979 (42 years). I am a general builder. My customers tend to be within a ten mile radius and like me to begin my days work at about 9.00 am. This means that I travel along the B 2017 towards Tonbridge between 8.00 and 9.00 am. With Capel Primary School and Somerhill School on my route it can take up to half an hour just to get to Tonbridge, so if the proposed plan goes ahead a secondary school will be dumped next to the primary school and make the traffic chaos much worse.

I have two dogs and regularly enjoy a walk with them to either Tonbridge or Paddock Wood along public footpaths through open fields. This is why I have loved living in a village surrounded by green belt. If the plan goes ahead I will be walking through soleless housing estates whichever way I turn.

During the time that I have lived here we have suffered at least four floods, resulting in considerable damage to goods and property, due to drainage systems being totally overwhelmed. How can the dumping of another 500 acres of concrete on a flood plain in this area be considered viable?

Trains from Paddock Wood and Tonbridge, during rush hour are standing room only and car parks are full so how will a further additional 2100 dwellings in the Tudeley area alone not withstanding the similar ammount of dwellings in East Capel, with a probable high percentage of London commuters, be catered for?

Why do brownfield sites seem to be ignored. Is it because it is so much easier for the council planners to deal with one landowner and to hell with those who will suffer because of it. Simply lazy planning.

So many dwellings bulit in such a localised area cannot be serving the local community so what will happen is they will be bought up by UK and foreign investors to be sub-let to people who can only afford to rent or, as has happened locally already, batches of unsold properties have, in fact, been sold to other councils, namely Lewisham and Croydon so that they can ship out council tennants in bulk so that their old dilapidated houses can be pulled down and redeveloped to a much higher standard so that they can be sold on for huge profits. The majority of rehoused council tennants will probably then need to commute to remain in employment and hence increase the strain on the railways

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jackie Cobell [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Jackie Cobell [REDACTED]
Comment ID	PSLP_675
Response Date	29/05/21 22:52
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	

Respondent's Name and/or Organisation	Jackie Cobell
---------------------------------------	---------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
----------------------	------------

Is sound	No
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Complies with the Duty to Cooperate	Don't know
-------------------------------------	------------

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My name is Jackie Cobell and I am 66 years old. I am a retired foster carer for Kent County Council and I have lived in Capel for 42 years. I strongly object to this preposterous plan that has been born out of lazy planning by Tunbridge Wells Planning Department.

Our home has been flooded several times, the last time being February 2020. Many homes in the village were also flooded. It is not very nice having raw sewage in your home. My home is in a flood zone so building thousands of extra homes in a flood zone is ludicrous!!

We live on a B road, a country lane and the traffic is horrendous at rush hour, which on entering Tonbridge it is gridlocked already!

The trains will not cope with all the extra commuters, or the traffic with what will be essentially a commuter zone.

At first we were told this huge development would provide homes for local folk. This is just not true. These homes will be aimed at investors. Youtube have adverts, in China in Chinese, of the developments in the next village and other areas in the South-East.

We are heartbroken at the thought of our beautiful villages and Greenbelt countryside being ruined forever, along with our wildlife which is already in terrible decline. The next generation will suffer at the loss of our green open spaces which have proved to have been a life saver in these awful times of Covid 19.

We are most upset that Tunbridge Wells Borough Council have not listened to us at all, dumping 65% of their housing quota on only 6% of the Councils population.

There is no infrastructure, the local doctors are stretched and so is our hospital at Pembury.

TWBC have not looked at brownfield sites, even though we were told there were 109 brownfield sites, one of them being a 5 acre site opposite Tunbridge Wells town hall, laid bare for over 20 years! Developers would rather bulldoze Greenbelt and make more profit. It doesn't make any sense!

There is a more appropriate site at Castle Hill that has much better access to an A road which Tunbridge Wells Planners have totally ignored. One thinks that the deal was done and dusted with the landowner offering around 500 acres of the Medway Valley years ago with villagers having no say at all. We feel something dodgy has gone on, especially since the lead councillor at a meeting was heard to say slyly "you'll never win"!! Where is the democracy?

The planning department have no empathy to our plight of being flooded again... the water has to go somewhere! Adding that to pollution, and living in a dust bowl caused by all the construction traffic. Our children will suffer. The homes being built are not affordable, nor are they for our younger generation. Indeed foreign investors are buying up houses especially in the South-East.

Boris Johnson and his mantra of "Build, Build, Build" is prepared to sacrifice our greenbelt countryside to prop up the economy. The Bank of England has even said that homes are the best assets now with the greatest profit yield.

In years to come there will be an enquiry into why so much green belt was eaten up but once it's gone it will be gone forever!!

Tudeley village is not the right area for a housing estate of this magnitude especially when another site was recognised as being a better alternative with better links to railway stations.

I hope you take all my concerns into consideration. We do need more affordable homes but for OUR youngsters and not for greedy buy-to-rent landlords and investors,

Work and Housing should be more balanced to include other areas of the U.K. otherwise the South East of England will just slide into the English Channel !!!

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mark Colyer [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mark Colyer [REDACTED]
Comment ID	PSLP_1004
Response Date	03/06/21 08:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mark Colyer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We have lived since 1993 in Tudeley where we have raised children through the local schools of Tonbridge and Tunbridge Wells (TW). We live between the proposed STR/SS3 site and Tonbridge. For the last 10 years I have run a business based on Riverside Road, Tonbridge to which I often commute along the B2017 or take a train to London from Tonbridge station. We shop in Tonbridge. As such, I am a resident of Tunbridge Wells but feel more a part of Tonbridge and reside on the border between the two boroughs. I feel well qualified to provide thoughts on the horrific real world implications of this plan for the residents of this part of TW, but also those who live and work in and around Tonbridge.

In short, the proposed Tudeley Village (TV) is situated in the most unlikely, unconnected, unsustainable location imaginable. Whilst on paper it appears deliverable through single ownership, at what risk to local residents and tax payers in the widest sense? It is fundamentally unsound for numerous reasons including the following.

CONNECTIVITY

- . TV is not connected to TW or anywhere of any scale other than Five Oak Green Village and Tonbridge via the B2017. It will need a completely new additional road consuming further Green Belt as shown on Map 33 of the PSLP to the south east. On this it is referred to as "Road Improvement" – this is not a fair description of nearly 2km of road construction across agricultural fields and hedgerows. There is no access planned to the north. The remaining access is to Tonbridge. This is where potentially 3-4000 extra cars will come and go for the residents and those coming into the TV schools will drive. They may well be more and more electrified over the next decade, but they are still vehicles consuming road space and the vast majority will be fossil fuel powered for many years to come. The road is permanently gridlocked TODAY during rush hour with school traffic and commuting traffic to/from Tonbridge station and none of the proposed road improvements address the fundamental issue that from the Woodgate Way roundabout the Tonbridge roads are the restriction that cannot be removed. There is no plan (only a dream) of a rail station. It is therefore in concept a Garden Village "island" floating in a beautiful agricultural and bio-diverse landscape, missing the essential requirement of successful garden villages - being located within an existing transportation infrastructure.
- . High permeability is required of this Garden Village. But it is split by a railway line with limited vehicle crossings. And built on a hill with 35m of elevation in approximately 850m with an average gradient of >4%. So with a strategy to "maximise accessibility by foot from the new dwellings to serve local shopping needs" and "the layout should provide good levels of permeability to encourage more sustainable modes of transport. Walking and cycling linkages to be provided within the site" (page 160/161 of PSLP) many people will not be able to cycle and some walk around the south side of the site due to the gradient alone.

- . The plan is clearly UNSOUND with respect to connectivity. It is not positively prepared in terms of sustainable development, it is not justified with proportionate evidence, it is not consistent with policies for sustainability in terms of the road infrastructure required to provide limited access.

GREEN BELT AND HOUSING NEEDS

- . Regarding housing needs, Para 4.11 of the PSLP states “there are not exceptional circumstances to depart from this national default, standard method”. And it goes further in 4.13 “it is appropriate to assess the potential for also contributing towards unmet needs from elsewhere, as well as at providing for higher levels of housing need for the borough itself.”
- . The NPPF states in Para 11b) “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 area6 .” Reference 6 includes “land designated as Green Belt”.
- . On one hand TWBC argues there is no exceptional circumstance for NOT meeting its housing needs PLUS offering to help neighbouring councils to take their needs, ignoring the NPPF Para 11b) guidance, and then argues there IS exceptional reason to remove Green Belt in order to meet its housing needs and more. This logic for releasing 600 acres of Green Belt land and >5% of TWBC total Green Belt area is UNSOUND. It is not positively prepared, nor justified nor consistent with the NPPF.

SUSTAINABLE ALTERNATIVES TO TV

- . Once again Section 4.47 of the PSLP states “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.”
- . I believe Section 4.47 to be both untrue and misleading. It is NOT accessible to nearby local towns as covered previously under CONNECTIVITY.
- . TWBC admits its proposal is not sustainable “no sustainable option has been identified”, but this is not in my opinion a wholly true statement. Whilst it may be true that none of the alternatives are wholly sustainable in the terms defined in the Sustainability Appraisal of the Pre-Submission Local Plan, other alternatives have been identified and further alternatives for brownfield development are available but neither have been assessed fairly or consistently. I will not repeat the detail of Sustainability Appraisals provided in others’ inputs, but when assessed transparently and consistently and objectively by TWBC own scoring methods THERE ARE MORE SUSTAINABLE ALTERNATIVES and combinations including Blantyre, Castle Hill, brownfield and possibly Horsmonden. It appears that TWBC does not wish to look objectively at the alternatives – they are there and have not been given a fair review. See Save Capel input for details.
- . The plan is UNSOUND with respect to sustainable alternative strategies. It is not justified with proportionate evidence, and it is not consistent with policies for sustainability.

RISK AND DELIVERABILITY

- . As a tax payer to TWBC I would like my money spent wisely and I do see the benefit of having a Local Plan. Amongst many other things, ability to deliver a Local Plan is key. I can obviously see the benefit of a single land owner for TWBC.
- . However it appears this single fact has clouded the whole decision process such that the viability risks of TV outweigh any theoretical deliverability benefit offered by one landowner.
- . In simple terms, the cornerstone of the Local Plan is TV and East Capel as a whole. There is no fallback, yet MAJOR areas of the plan are still missing substance, costings or detail. So our money is being spent progressing a single plan with no idea if it is feasible or if the economics add up. The TV site is bereft of almost any infrastructure and it has to be questionable if it has sustainable scale for the undefined infrastructure investment required. There are 124 “TBC” items in the Appendix of the Infrastructure Delivery Plan in either the “Indicative Cost” or “Funding Position” columns including Libraries, Highways, Schools, Flood Risk Alleviation Schemes and so on. In other words, not the odd bus shelter but MAJOR INFRASTRUCTURE is uncoded and/or has unidentified sources of funding.

- Other aspects such as the compatibility of affordable housing goals with all the high value design and sustainability features, HQM Level 4, low density of housing and so on appears inconsistent and risky.
- A natural outcome may well be that the development as proposed is NOT viable and with no other alternative at that point, the “solution” needs to be larger and or cheaper requiring MORE Green Belt or AONB release or major compromise in the master planning.
- The “eggs in one basket” Local Plan is UNSOUND with respect to the risks of delivery and appears to be fuelled by the single goal of working with the one landowner on a heavily compromised, unsustainable and possibly non-viable strategy at the expense of both common sense, AND OTHER ALTERNATIVES which exist should TWBC care to look objectively.

Question 6

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The Local Plan should argue there is exceptional circumstance to reduce the housing needs calculation, rather than productive Green Belt due to nature of TW make up of AONB and Green Belt.

Build a more diverse, lower risk and better balanced strategy comprising a spread of development first using brownfield sites such as Blantyre, then the many other available sites, particularly well connected ones around the A21 and North Farm where AONB has been released in a more sustainable way already, including Castle Hill, also under single ownership. Focus on the needs of TW existing residents and don't create a commuter magnet drawing in people from London seeking larger housing who will swamp Tonbridge roads, station, schools and facilities.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Alternative sites are not consistently or transparently assessed against the SA Strategic Objectives using Appendix B. They are discounted without rigorous review.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Roshini Coombs [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Roshini Coombs [REDACTED]
Comment ID	PSLP_1687
Response Date	04/06/21 00:27
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Roshini Coombs
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Capel since 2016 when I moved here with my family. We chose to live in this area for its peaceful rural setting as well as the proximity to Tonbridge and Tunbridge Wells. With two small children, we regularly enjoy walks through the nearby fields and woodlands. As commuters to London, we were particularly drawn to the ease of access to Tonbridge and the parking facilities available at the station.

I oppose the plan for the Tudeley Village development on the basis that it is not sound, for the following reasons:

- The development will result in a loss of 600 acres of Greenbelt land. The NPPF requires that there must be evidence of 'exceptional circumstances' in order to make any changes to Green Belt boundaries and that the Council must demonstrate that it has fully examined all other reasonable options in its development strategy, including making as much use as possible of brown field sites and under-utilised land. There is no available evidence that the Council has carried out any such investigations and the justifications provided in respect of Tudeley Village specifically (in Paragraph 6.186 of the Development Strategy Topic Paper) are inadequate as the proposed improvements would not have been contemplated if it were not for the planned development. Additionally, the Tudeley Village site includes ancient woodland, listed buildings and abuts the High Weald AONB. It is essential that these are protected for their environmental and cultural benefits. A development of the size proposed by the council would have a devastating impact on these important aspects of the area.

- The development will bring 2,800 new homes to an area which currently has around only 900 homes. Development on this scale is entirely disproportionate and the area does not have the infrastructure to cope with the associated influx of residents. Medical service providers, schools, roads and transport services would all be put under severe and unnecessary strain. It is also difficult to see how the proposed road improvements would help to alleviate the inevitable increase in traffic. A large number of residents would likely travel into Tonbridge for schools or for their commute (as Tonbridge station has the most links and parking) so would not be using the A228 or the new link road bypassing Five Oak Green but would instead add to the already very heavy traffic on Tudeley Road at busy times of the day. There is bound to be a significant impact on the neighbouring borough of Tonbridge & Malling but there has so far been no evidence of cooperation between the councils.

- The proposed new link road bypassing Five Oak Green would be built on high quality Grade 2 agricultural land. The land on either side of Sychem Lane is beneficial to the borough both economically, environmentally and aesthetically. It also provides a public footpath used by many people for access and exercise. Destroying land that is essential to the character of the surrounding area in order to alleviate traffic caused by an unnecessarily large development would be deeply at odds with the NPPF.

- The site of Tudeley Village is on an area highly susceptible to flooding. There is no guarantee that the building work would mitigate the risk of flooding (as the council suggests in its justification for releasing the land from the Green Belt). It could in fact make the likelihood of flooding greater in the local area. Paragraph 10 of the Strategy for Tudeley Village states that the strategy includes ensuring that a drainage strategy is in place in consultation with the relevant authorities “unless exceptional circumstances arise”. It goes on to say that such strategy “should demonstrate that the development will not exacerbate flooding elsewhere in the vicinity”. The inclusion of the caveat that “exceptional circumstances” may somehow release the council of its responsibility to provide an adequate drainage strategy is worrying, to say the least.

Question 6

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Remove Policy STR/SS3, the Strategy for Tudeley Village and all references to the Tudeley Village strategic site and/or development from the Local Plan. Remove all references to the new link road bypassing Five Oak Green from the Local Plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Thomas Coombs [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Thomas Coombs [REDACTED]
Comment ID	PSLP_1031
Response Date	02/06/21 21:33
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Thomas Coombs
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraphs 5.189, 5.224 and 5.199

Policy STR/SS 3 The Strategy for Tudeley Village

Policies Map 33

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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1. I have lived in Capel village with my family since 2016, my son goes to school locally, and until the first UK lockdown in March 2020 I commuted to London for work via Tonbridge train station.

2. I have personal experience of local traffic congestion including on my commute to and from Tonbridge train station, and dropping off or picking up my son from school.

3. I do not believe the proposed Local Plan is sound. I explain below with reference to the Tudeley Village development including the "new link road, bypassing Five Oak Green" (Local Plan, paras 5.189/5.224).

4. "Tudeley Village" (para 5.199)

The Tudeley Village development is not sound as it is not justified, effective, or consistent with national policy for these reasons:

4.2 It is disproportionate: Capel ward has approx. 900 dwellings, and this development would add another 2,800 (along with 2,060 in the East Capel development). It is a disproportionate amount, and is not justified.

4.3 It results in a significant loss of Greenbelt: It's not clear there is evidence to justify the significant loss of 600 acres of Greenbelt land. Sections 136 and 137 of the NPPF states the boundaries should only be altered where exceptional circumstances are fully evidenced and justified. For example, the Local Plan does not demonstrate it makes as much use as possible of brownfield sites, as it has not set out specific alternatives that have been considered and ruled out.

4.4 It is prone to risk of flooding: The Tudeley Village development is on a flood plain. Surface water flooding is a common occurrence in the Capel Ward in times of sustained rain, particularly Five Oak Green. It's hard to see how a development on this scale would be justified given the significant flooding risk.

4.5 It is not infrastructure-led: The development should be infrastructure-led, not development-led. It is not effective as there is, even at this late stage, no evidence of a Statement of Common Ground with Tonbridge and Malling Borough Council who will be significantly impacted by the development. For example, it is not clear how the inevitable increase in traffic to Tonbridge from the development, along Tudeley Road, will be managed. In addition, there are no plans for a new rail station under the Local Plan (para. 5.218) to mitigate the inevitable increase in demand at Tonbridge train station.

5. The "new link road, bypassing Five Oak Green" (paras 5.189/5.224)

The “new link road” is not sound as:

5.2 It cuts through the highest quality Agricultural Land in TW borough

5.2.1 The TWBC Development Constraints Study (Oct 2016) (“**DCS**”) considered evidence on development constraints, and applied limitations in the NPPF. Para 2.35 of the DCS confirms TW borough contains some areas of “*higher quality*” Agricultural Land (i.e. Grade 2), and although it concludes its “*quantum*” would not constrain development, this proposed new link road would cut straight through Grade 2 Agricultural Land. 5.2.2 It is not consistent with the national policy, as it does not recognise “...*the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land...*” (Paragraph 170(b), NPPF). It also does not demonstrate consistent with the national policy that: “*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*” (Footnote 53, Paragraph 171, NPPF).

5.2.3 Agricultural Land remains important for the visual contribution to the landscape and character of the borough (which is accepted is important by TWBC (para. 2.36, DCS)), and this new link road would cut through a public footpath connecting Sychem Lane to Church Lane which is a popular local route.

5.3 The Transport Assessment does not provide evidence to support it

5.3.1 The Local Plan states the road would “...*alleviate issues caused by...Tudeley Village...*” (para. 5.190/5.225). The ‘Strategic Sites Masterplanning and Infrastructure Study’ (Feb 2021) also states “...*the growth at Tudeley Village...would increase traffic along the B1260 through the village...The Transport Assessment (SWECO) underpinning Regulation 18 Draft Local Plan pinpoints the need for a bypass...*” (para. 6.33).

5.3.2 This Transport Assessment by SWECO dated Sep 2019 (“**SWECO Report**”) (also titled the “TWBC Local Plan Transport Evidence Base”) concludes this new link road would “...*remove through highway trips through Five Oak Green...*” at para 9.6.6 Table 9-2, however, it is not clear that this is a justified conclusion.

5.3.3 In considering local factors as well as evidence in the SWECO Report, it seems likely most (if not all) new commuters to London (currently 83% of the rail mode share, Para 5.4.9 SWECO Report) from the Tudeley Village will travel to Tonbridge train station instead of the Paddock Wood or Tunbridge Wells train stations, and not through Five Oak Green, as:

(a) the train services to London from Tonbridge are far more frequent than from Paddock Wood or Tunbridge Wells (para 5.4.12, SWECO Report); (b) the journey times from Tonbridge to London are shorter than from Paddock Wood or Tunbridge Wells (para 5.4.11, SWECO Report); and (c) the season ticket prices to London are lower from Tonbridge than from Paddock Wood or Tunbridge Wells.

5.3.4 Therefore, it appears that statement at para 5.4.12, SWECO Report: “...*it is likely that some catchment to the west of Paddock Wood, such as Five Oak Green, will connect to rail at Tonbridge*” is an underestimate. It is more likely it will be most of (if not all) the catchment.

5.3.5 Furthermore, these conclusions in the SWECO Report:

“*Based on the location of other stations and connectivity across Tunbridge Wells borough, it is expected that the main areas that connect to Paddock Wood [train station] by car are...Five Oak Green and Tudeley to the west.*” (Para 5.4.15, SWECO Report); and

“...*with much of the demand [in “TW North” (i.e. Capel ward) for using Rail to commute to work] focused on Paddock Wood [train station]*” (Para 5.4.29, SWECO Report),

are both odd and unjustified, as they do not refer to any evidence, let alone any proportionate evidence.

5.3.6 It seems likely the road most impacted by an increase in commuters at Tudeley Village will be Tudeley Road, the route towards Tonbridge (and its train station). I know it well as that’s the route I drive to commute to Tonbridge station to travel to London. That route is also the same used to drop off or pick up students at a large school off Tudeley Road.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove STR/SS3 The Strategy for Tudeley Village and any reference to the Tudeley Village from the plan, including the "new link road, bypassing Five Oak Green".

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Councillors J Botten, M Boughton and J Lark [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Councillors for Medway Ward, Tonbridg
Address	[REDACTED] Tonbridge TN9 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Councillors for Medway Ward, Tonbridg [REDACTED] [REDACTED]
Comment ID	PSLP_890
Response Date	02/06/21 08:35
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Councillors J Botten, M Boughton & J Lark, Borough Councillors for Medway Ward, Tonbridge
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	Policy STR/SS 3 The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

In advance of the close of the Regulation 19 consultation on the Tunbridge Wells Borough Council (TWBC) Local Plan on Friday, we wanted to write to reiterate our opposition to aspects of the plan. Specifically, STR/SS3 - The Strategy for Tudeley Village, which will have an impact on the part of Tonbridge we represent above and beyond all recognition.

As Borough Councillors representing this area of Tonbridge for a combined 10 years, we are fully aware of the huge sacrifice people make to live here. Our community is one of the best located around with excellent transport links and schools, which attract people to come and live here. While this is welcome, it puts an increasingly server burden on infrastructure around Tonbridge which is already creaking.

Just last week, Tonbridge and Malling Borough Council (TMBC) rejected a planning application for another supermarket at Tonbridge Retail Park on Cannon Lane because of concerns about the ability of the road network to cope. Cannon Lane was originally built as the 'mini-bypass' in Tonbridge, yet is frequently gridlocked. Thousands of homes just over the border in Tunbridge Wells borough, as allocated in STR/SS3 at Tudeley Village, will only lengthen the queues across the south east of Tonbridge and make it harder for children to get into one of the excellent schools in the town.

You will have seen us make these points as part of our response to the Regulation 18 consultation in 2019, and we are disappointed that they have, on the whole, not been addressed since. You will also note that we have consistently spoken strongly at TMBC to influence its own response.

As part of that response, agreed at the Planning and Transportation Advisory Board meeting chaired by Jon Botten earlier this month, TMBC made a number of accurate and extremely pressing comments. Most relevant is the inability of TWBC to fully model forthcoming development in Tonbridge as part of its assessment, since residents in Tudeley will look towards the town much more than any other of the identified retail centres in Tunbridge Wells borough for services, shops and schools. Consequently, we would have expected to see a complete list of proposed mitigations - if even possible - within Tonbridge to cope for this. Sadly none have been put forward within the Local Plan process, and we do not think the reduction in car use arising from this development is realistic.

We also wanted to touch on the landscape impact, since the area we represent goes far east beyond Cannon Lane, including some of the rural roads and public footpaths which would link the proposed development at Tudeley with Tonbridge. There is no doubt that this development, and more people

using this area would result in greater intensification of its use. Therefore it is not in doubt, in our view, that there will be a detrimental impact on the landscape of Tonbridge as a result, and it is of deep concern this has not been modelled. Specifically, we would argue this is incomplete because the Landscape and Visual Impact Assessment only applies to sites located within the High Weald Area of Outstanding Natural Beauty. While this is important, it underplays the wonderful landscape that is visible from within Tonbridge and to Tonbridge from notable landmarks. We would have expected this assessment to account for the character of our area as well.

As a result we would argue strongly that the inclusion of STR/SS3, Strategy for Tudeley Village in the draft Tunbridge Wells Local Plan is unsound and does not meet the tests contained within the National Planning Policy Framework. It is not positively prepared because the cumulative impact of development on Tonbridge and Malling has not been assessed. It is not justified because reasonable alternatives have not been considered fully before this. It is not effective because significant infrastructure improvements will be needed, which are not forthcoming. Finally it is not consistent with the National Planning Policy Framework because the severe impacts on traffic cannot be mitigated, as TMBC have made clear on Cannon Lane already.

We therefore ask that you remove this allocation from the draft Local Plan.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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We therefore ask that you remove this allocation from the draft Local Plan.

Question 7

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_524
Response Date	28/05/21 08:08
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

CPRE Kent objects to policy STR/SS3. The proposed development is in an unsustainable location and on green field land in active agricultural usage. We are concerned that the development will not result in a sustainable settlement for a significant period of its 15+year build out projection and will require the loss of 183 hectares of green belt land for the site itself and a further as yet unspecified amount to provide the new and upgraded roads and active travel routes necessary to provide inter-settlement links to Tonbridge, Paddock Wood and Royal Tunbridge Wells.

CPRE Kent is concerned that around one quarter of the homes to be delivered by this Plan are at this site, with delivery managed by a sole landowner. If delivery at this site stalls, housing need will not be met as predicted in the Council's housing trajectory.

Sustainability

The Masterplanning and Infrastructure Study (February 2021) note on a technical workshop raised the following: that Tudeley lacks a rail station and will need good bike link to Paddock Wood or Tonbridge stations to promote sustainable travel; and that the route connecting Paddock Wood – Tudeley – Tonbridge is very hostile to bicycles (paragraph 4.50).

The new settlement is about 4.5 miles from Paddock Wood railway station by road (3 miles as the crow flies) and 2.8 miles from Tonbridge railway station by road (2.5 miles as the crow flies). Rail travellers may prefer to travel to Tonbridge - which is on a confluence of four lines with trains going to Tunbridge Wells, Hastings and Redhill (with onward links to Gatwick Airport) as well as London, Sevenoaks, Dover and Ramsgate - rather than back to Paddock Wood.

There is currently no active travel infrastructure between the site and these railway stations. The Masterplanning and Infrastructure Study suggests that these would follow the existing roadways while the Strategic Sites Topic Paper states that the Hadlow Estate have identified "a completely offline route on land within its control to provide a cycle and pedestrian route from Tudeley Village westwards to Tonbridge ...", indicating a cycle journey time of 22 minutes from the centre of the village. As the Tudeley Village Delivery Strategy produced by the Hadlow Estate does not form part of the formal Local Plan supporting document set, no further detail of the route has been provided and such a route would presumably only be off-road up to the perimeter of Tonbridge, we consider that there is insufficient evidence to support this claim.

We wonder if residents would choose to cycle this as part of an onward journey to work in London and think it highly unlikely that residents would choose to walk, as this is a 45 minute to 1 hour walk, depending on the speed of the walker.

The Transport Connections maps indicate that inter-settlement cycle routes will align with existing roads. Given the serious dangers of cycling on rural roads if there is no off-road or segregated cycle provision, these will be of little use to Tudeley Village residents. There need to be costed, funded

proposals to provide much better, largely off-road cycling routes, and for the Council to use its compulsory powers to create them.

Consideration should be given to the impact on train capacity at Tonbridge and cycle parking capacity in the new cycle hub at the railway station to ensure that Tudeley garden settlement can actually attain its goal of being a low car, exemplar development.

Although the potential for provision of a railway station on the Tudeley garden settlement site is noted in the strategy preamble and land has been set aside for this in the masterplanning we are not convinced that this is a realistic prospect due to impact on journey times and cost.

Furthermore, we are aware that the Kent Rail Strategy 2021 is considering a direct rail service linking Kent, Gatwick and Reading and seek assurances that development at Paddock Wood, East Capel and Tudeley would not prejudice this. (See paragraphs 3.7, 3.9, 5.5 (xi) and 9.10 ((see web link)

Policy STR6 (b)(1) sets out that a rapid bus/transport link will be provided from Paddock Wood to Tonbridge (via Tudeley garden settlement). Policy STR/SS3 The Strategy for Tudeley Village makes no reference to this nor does Map 32 Tudeley Village Plan.

Tudeley is not presently served by a frequent bus service and there does not appear to be any supporting evidence to show that a regular walk-on service could be provided early on for the new settlement, or that the scale of development would support a walk-on service. It is more than likely that new residents would travel by car for the whole or part of their journey whether to work and/or school or for wider retail and cultural needs. This allocation straddles the railway line which is crossed by Sherenden Road (bridge under/height restriction) and Hartlake Road (bridge over). These are both narrow country roads. The Infrastructure Delivery Plan (March 2021) identifies a new railway bridge (critical and medium term) and works to reduce the existing railway bridge at Hartlake Road (highly desirable and medium term) and new railway bridge for pedestrians and cyclists (highly desirable and long term) to be funded by the developer and delivered by the developer/Network Rail. It is unclear what the impact on the development will be if the expensive Hartlake Road scheme is not provided, including free-flowing movement within the site and community cohesion.

We also note that policy point 12 specifically includes the A228 works and the bypass around Five Oak Green as highway improvements funded by developer contributions. The four highway improvements in the Infrastructure Delivery Plan relating to the highway connection to Tonbridge, all of which are assigned a priority of critical, are not specifically included and it is unclear whether these will be provided to support travel to Tonbridge.

The IDP identifies many infrastructure projects being delivered in the medium term which is defined as 5-10 years. It is unclear if this means from 2026-2031 or 5-10 years from the completion and occupation of the first homes. This includes facilities such as bus provision, health provision, community centre and open space provision. These are facilities that both support sustainable development and help develop community.

The plan provides for a six-form entry secondary school which will serve a wider catchment than the new settlement. It is unclear where pupils will come from or how they will travel to the new school.

Efficient Use of Land

CPRE Kent does not consider that the proposed development makes efficient use of land as required by the NPPF. Our comments on strategic policies STR1, STR2, STR3 and STR4 make clear why we consider that achieving high density of development is of critical importance.

Paragraph 5.3 of the Strategic Sites Topic Paper (March 2021) states that average density for the 2800 dwellings at Tudeley garden settlement would be just under 30dph based on a developable area of 95ha. This density is very low. If referenced to the green belt land being released for this site (183ha) this translates to 15.3dph – clearly a wasteful approach for viable green belt, greenfield agricultural land.

While this proposed development is being referred to as a garden village, it is clear that a housing development of this scale will inexorably change the character of the site, turning it from a rural landscape to a built-up area.

Higher density housing does not need to be ugly. Some of the most desirable properties in Royal Tunbridge Wells 'village area' are terraces and other clustered dwellings – the now-valued high density housing of the past. Even in modern developments, a village atmosphere can be successfully created

with terraces, maisonettes and other three to four storey developments forming an attractive part of the development. More compact forms of development can assist in delivering a complete and connected neighbourhood where people can meet their everyday needs within a short walk or cycle.

The National Design Codes consultation (January 2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph.

Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) (see web link) concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

Agricultural Land

Paragraph 170(b) of the NPPF requires planning decisions to contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land. With paragraph 170b, footnote 53 stating that “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.” The allocated land is classified as Grade 2 and 3 – which is at least in part best and most versatile land. There appears to be no evidence that the Council has sought to identify areas of poorer quality agricultural land for development.

As set out in our response to policy EN20, agricultural land is important in preserving the means to provide a reliable food source with low food miles and high animal welfare. Recent events have demonstrated the importance of maintaining home-grown food supply. The relatively small fields of the High and Low Weald, with their hedgerows that provide shelter, are particularly well suited to providing grazing for non-intensive livestock farming, as well as the fruit and vegetables of the ‘Garden of England’. The vast majority of this site has remained as undeveloped agricultural land since the mid 1880s. (Strategic Sites Masterplanning and Infrastructure Study Appendix 2, paragraph 6.7.6).

Agricultural land also has a vital role to play in absorbing carbon and preserving biodiversity, including the biodiversity in soils. Once it is built over the soil biodiversity is lost.

This agricultural land is a precious and finite resource that must not be wasted - yet another reason why any development at this site must be at a much higher density and in a more compact form than currently proposed.

Green belt release

It is noted that the plan provides for the release of 183ha of land from the green belt at Tudeley. Given that a large part of the borough is not green belt it is felt that the disproportionate loss of green belt in this location (which forms a larger swathe of green belt east of the A26 running from Watlingbury to Tunbridge Wells) would undermine the five purposes for green belt designation as set out in paragraph 134 of the NPPF.

The Green Belt Study Stage Three Assessment of Green Belt allocations (November 2020) confirms that development in the green belt for Tudeley garden settlement would result in high harm. The Strategic Sites Topic Paper suggests that “The masterplanning seeks to provide robustly defined boundaries to the remaining Green Belt between Tonbridge, Tudeley Village and Paddock Wood to prevent urban sprawl, neighbouring towns merging with each other and safeguarding the countryside from encroachment in the long term.” As none of the Policies Maps provide a single view of the relative locations and LBDs of the strategic sites and the existing neighbouring settlements within and outside the Borough, the risk to the green belt both from this development and in the long term is not visible.

The on-line and offline improvements to the A228 together with new Five Oak Green by-pass will cause further harm to the green belt countryside.

CPRE Kent is further concerned that the Council does not intend to designate additional land as replacement green belt.

It is noted that the preamble to this policy (paragraph 5.211) states that “the Development Strategy Topic Paper sets out the exceptional circumstances and compensatory improvements to the remaining Green Belt to justify the changes to the boundary in this location.”

While some potential compensatory improvements are set out in the Strategic Sites Topic Paper it's not clear from policy STR/SS3 what the specific compensatory improvements to environmental quality and accessibility of the remaining green belt are, in addition to the general requirements/criteria for the proposed development. What compensatory improvements are being specifically sought compared to other developments that don't result in release of green belt land?

We also question the policy assumption that measures to reduce flood risk to residential areas at Five Oak Green (policy point 10) should be regarded as compensatory improvements to the green belt. They form part of the Council's *justification* for release of this green belt land, but do not appear to deliver improved environmental quality and accessibility to the green belt.

Assurances are sought as to how compensatory improvements to environmental quality and accessibility of the remaining green belt will actually be delivered.

Employment

The policy at 2(b) provides for main village and local centres for a range of service and employment uses of an appropriate scale to serve the new community. It is not clear if these centres would deliver the number and type of jobs required for a high proportion of residents to work locally in an area where house prices are likely to be high. There must be a strong likelihood that this will become a new dormitory town for London.

AONB

CPRE Kent objects to the provision of a new settlement at Tudeley and the impact that this would have on the setting of the High Weald AONB. The proposed new village would be highly visible on the slopes leading down to the flat lands of the River Medway flood plain, when viewed from the AONB.

Paragraph 172 of the NPPF:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited”.

Planning Practice Guidance, July 2019, states:

“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas **may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process**, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. [CPRE Kent emphasis]

Paragraph: 041 Reference ID: 8-041-20190721.

AONBs together with National Parks have the highest status of protection in relation to landscape and scenic beauty. For National Parks “the Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services”[1]. This principle equally applies to AONBs through paragraph 11(b)(ii) of the NPPF to ensure that the scale and extent of development proposed does not harm the purposes for which these areas were nationally designated.

Flood Risk

Paragraph 149 on the NPPF places an onus on the Council to ensure that it takes “a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for flood risk”.

Land allocated for Tudeley garden settlement adjoins land in flood zone 3b – the functional flood plan for the River Medway, and is therefore a very high risk flood area. While it is noted that policy requires that development will not exacerbate flooding elsewhere (particularly from the Alder Stream at Five

Oak Green) and should deliver flood storage/attenuation/mitigation measures, it is considered that development in such close proximity to an area at risk of flooding, and which would exacerbate flooding further afield, should not be permitted in this location.

Light Pollution

CPRE Kent is concerned that development of the site will increase and intensify the extent of light intrusion in this and the surrounding areas.

NPPF 180(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes. The CPRE Dark Skies map <https://www.nightblight.cpre.org.uk/maps/> shows that Tudeley is in the darker skies category (one up from brighter) and the AONB to the south and the river plain north to Hadlow are both in the next to darkest category. The scale of the development and its associated roads will introduce light pollution into the area of dark skies contrary to the NPPF.

Dark skies should be referred to under section 5 of this policy.

Heritage Assets

As well as considering the impacts of development on All Saints Church regard should be given to (views from) Hadlow Tower and the impact on the heritage assessments at Lilley Farm and Bank Farm within the proposed allocation and the numerous listed buildings at the edges of the allocation. Section 7(b) should consider the impact on views of Hadlow Tower from the High Weald AONB.

Conclusion

The plan is therefore considered to be unsound because it is not consistent with national policy.

CPRE Kent would wish to participate at the examination hearings to explore this issue further.

[1] English national parks and the broads: UK government vision and circular 2010 (see web link)

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

CPRE Kent would wish to participate at the examination hearings to explore this issue further.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The current Sustainability Appraisal is based upon the “end state” of this development i.e. when all housing, facilities, services and infrastructure are in place. As the development of the “Tudeley Village” spans a long period with provision of housing and infrastructure likely to go hand-in-hand throughout this period, we suggest that SAs should be produced for the projected combined housing and infrastructure status at 5 and 10 years into the build. This would give a picture of what level of

sustainability is expected to be achieved during the build timescale and how sustainable the settlement would be if, by some mischance, no further development were to take place.

Comment

Consultee	Matthew Crane [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Matthew Crane [REDACTED]
Comment ID	PSLP_1810
Response Date	04/06/21 16:45
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Matthew Crane
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 Strategy for Tudeley village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am local resident living in Golden Green for the last 3 years. I grew up in Tunbridge Wells where my parents have lived for the last 32 years so I understand the local community. My wife and I moved to Golden Green from London to get back to living in the countryside as it is a fantastic place to bring up 3 young boys who want nothing more than wide open spaces and to really immerse themselves in the nature and local countryside.

I have a number of key concerns with the current plans -

- There is absolutely no consideration in the plans of adequate infrastructure with regards to traffic. With all my children attending local schools - Summerhill and Bishop Chavasse we are already confronted with significant traffic issues in getting them to school. With the proposal to close Hartlake Road this is only going to get worse and makes absolutely no sense.

- The traffic going through Tonbridge is already an issue. This can easily be seen on any weekday on Tonbridge high street and at the weekend. As a daily commuter to Tonbridge station the current infrastructure in the surrounding area is already insufficient. The current plans whilst drawn up by Tunbridge Wells borough council will ultimately end up with the large proportion of these residents using Tonbridge facilities. To say that this is not the case is clearly not linked to what all current residents say. The plans do not go far enough in tackling these issues.

- I am very concerned with the plans of building on the floodplains. With a house that already lives in proximity to the Medway and to see the annual impact of the flooding on the surrounding area I genuinely don't believe the current plans have actually thought through the issue of flood risk. The plans are putting the local community into danger and therefore I cannot see how they can be considered as safe.

- Whilst I accept that more housing is required in the local area and know one day my own children will need access to affordable housing, TWBC don't appear to have looked at other brownfield sites that could provide the same solution. TWBC has 20 Wards but TWBC want to put more than 50% of all of their new housing in just one ward - Capel. This will inhibit development elsewhere and creates a disproportionate burden on this local community.

- As we drive down Hartlake road every morning my children comment on how stunning the countryside is and how much they love living in this area. This plan is going to destroy an area of outstanding rural beauty, will create the destruction of 600 acres of greenbelt, will force the local community into dealing with 15 years of heavy construction and create even more air pollution. Put simply this plan might be creating housing but it is destroying the environment and community for a whole generation.

If this plan is approved in its current form the government and the local council will be letting down the next generation and destroying an amazing local community. It is simply no fit for purpose.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I wish to participate as I am more than happy to provide a voice to the representation provided above.

Comment

Consultee	Jeffery Crocker [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Jeffery Crocker [REDACTED]
Comment ID	PSLP_1142
Response Date	03/06/21 20:13
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4

Question 1

Respondent's Name and/or Organisation	Jeffery Crocker
---------------------------------------	-----------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 Tudeley

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
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Is sound	No
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Complies with the Duty to Cooperate	Don't know
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Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a local resident having lived in Tudeley for many years and wish to raise my strongest objection and concerns to the Tunbridge Wells Borough Council Draft Plan for a Garden Village (New town) at the CA1 site. This beautiful parish being a quiet rural ancient hamlet with grade 1 heritage sites attracted me to make it my home. The ancient woodlands, orchards, and reserves place it naturally as a special environment with an abundance of wildlife with rare species and specimens present.

I was so depressed to discover that our council had proposed such a monstrous misplaced scheme and called it a Local Plan, this being thrust upon local residents with little thought to the consequences, rather an option selected at the eleventh hour following a confused consultation without proper due process. Residents had 24 hours notice thankfully from a local councillor to attend a major public meeting arranged by TWBC. It would appear an easy option was selected which allowed TWBC to have to deal with only one land owner, surely this cannot be right, lazy planning is bad planning!

I was personally shocked to hear at a public meeting directly from councillors that many critical documents for their information had not been read prior to their voting to pass this proposed Local Plan, this is in fact on record, as some councillors asked for it to be recorded.

I am at a loss to why most of the housing need for the whole of the borough has been placed into such a small area detrimentally impacting Tonbridge when other sites, including so called brownfield sites with existing road access and free from flooding have been ignored?

Having spoken with informed residents many having been born in Tudeley and Capel qualifies me to list the salient headings which highlight and confirm the proposed site and Local Plan to be unsound. Interestingly Tom Tugenhugh MP for Tonbridge indicated the Soundness of the Draft Plan may be in question!

Flooding. (long history of floods- valley has highest flood risk in the UK)

Geology. (soil is known to be unpredictable swelling clays over mudstone with aquifers present)

Biodiversity (long established wet area, sanctuary and ancient woodlands)

Greenbelt and AONB (building on greenbelt is against government policy)

Water supply (Pollution and contamination risks are high due to leachate)

Impact upon Tonbridge (Tonbridge is already at full capacity)

Loss of quality Arable land. (good arable land is needed)

Local Housing needs. (ONS states the population is in fact decreasing)

Air Quality and Health (proposed plan will create 30 YEARS of pollution)

Garden Village Criteria. (not met, many errors and omissions, heritage sites not listed, Tudeley village is shown as a sketch!)

Infrastructure. (Roads, drainage, sewerage very poor to CA1 and Capel)

Heritage Sites. (Note. These have not been listed on the Local Plan)

Sustainability and Viability. (Building costs on such a site geology will be significantly higher than average, with likely endless delays due to water needing to be pumped from any construction site on CA1)

The impact on the small and rural parish of Capel and the detriment to the surrounding AONB which would contradict section 15 of the NPPF with associated quarrying construction and roads will be huge, with creation at source and overspill of pollution in many forms for an unhealthy and unnecessary time period which would likely undermine the Environment Bill 2019-2020 currently being assessed in parliament. This Bill makes provision for "improving" the natural environment regarding Waste and resource efficiency, provision of Air Quality, recall of products that fail environmental standards, makes provision for Water, Nature and Biodiversity and "Conservation Covenants" and regulation of Chemicals and for connected purposes. Such proposed housing numbers will be to the detriment of the Governments carbon aims, why would a responsible council wish to do this? I am informed no Environmental Assessment has been undertaken. Please note I have covered these topics further later in this letter.

Greenbelt

The Draft plan is against section 13 of the NPPF Building on greenbelt, this is only considered under "exceptional circumstances" paragraph 133 and 137 and it does not appear TWBC have examined fully other reasonable options. On the 27.4.2018 Savid Javid stated quote " Housing numbers will not justify building on the greenbelt" and Robert Jenrich Secretary of State for Housing Commerce and Local Government stated on 26.10.19 quote "Ruled out building on the Greenbelt" !

The proposals would virtually join Tonbridge to Tudeley Five Oak green and Paddock Wood making a none sense of basic planning principles it appears however that this may well be the intention. The Environment Bill will aim to enhance green spaces rather than build on them.

Assessment for Sites

Following the very poor notification and confused consultation process and what may be deemed a possible lack of Due Process being that the vast majority of residents in the parish were totally unaware of the Draft plan. Furthermore it appears a relatively small percentage of parishioners were able to respond despite quotes at public meeting by council heads. It is unacceptable that non internet users appeared ignored and unable to comment. It appears also the majority some 60% of respondents wanted a growth corridor approach and were unaware of the potential greenbelt destruction.

The assessment undertaken was "Not Rigorous" or Robust and really must be so .The planning preparation did not include Tudeley sites CA1 and CA2 until after the issues and options process in 2017 this means the largest housing area in the plan "did not" go through most of the plan preparation process, but was simply included in the second call for sites. It appears many brownfield sites are available within the borough with others not having been identified. The Queens speech in 2015 prioritised the selection of Brownfield sites for housing with councils able to prioritise planning permission for brownfield sites with Local Development Orders why has this not been pursued?

Other buildings and sites are also available, Blantyre House, Goudhurst Parish, Frittenden area, Horsmonden area, Kippings Cross, Land adjacent to Colliers Green Primary School,

Land at Great Bayhall, Land between Cranbrook and Sissinghurst, Langton Green, Wakehurst, land between Sandhurst and Iden Green, and Wakehurst Farm Bennenden.

Garden Village Criteria

The Draft Plan of 2017 has been abandoned, interestingly this stated there was no place for a Garden Village.

It appears that criteria for the garden village is contradicted with regard to the dissection of the CA1 site by an existing railway line which would create 2 separate villages, hinder many operations including access and egress and pose a danger to the proposed school site as well as other basic transport and appears to fail the basic principles of containment and cohesion and will not form a standalone settlement but transpires as a bolt on to Tonbridge

The Garden Village (New Town) at Poundbury would appear a real failure with crime and murder at the top of the problems and I wonder why the council think such a scheme may work in Tudeley ?

Air Quality

The NPPF states guidance for air quality within proposed development sites under paragraph 181 and paragraph 124 should be considered. Quality of the air would be lowered considerably likely to an unacceptable level in the immediate area this going against government legislation "The Clean Air Act 1993" and the Environmental Bill and policy and EU Regulation, permits being required under the directives. The proposed Draft plan assumes electric car usage together with electric bicycles which would appear to be a somewhat naive expectation particularly with the vast majority of such a large development likely to be occupied by commuters with thousands of visitors to such a development using traditional petrol and diesel vehicles. Such a large scale proposed development would also appear to contravene government thinking with regard to greenhouse gases which have to be proven to be within acceptable limits. A recent Appeal Court ruling creating a precedent in 2019. Statutory Environmental Impact Assessments would also be likely to fail under the circumstances. It would be very sad and improper if financial contributions were to be put forward to mitigate pollution.

Flooding

The Draft plan proposals for CA1 Tudeley village (New town) goes against The NPPF section 14 which is a grave concern indeed. Tudeley, Capel East, and Paddock Wood are all subject to regular flooding De Facto, historic flooding is documented from the 1700s to the present day with major incidents in 1960, 1963, 1968, 1999, 2000, 2009, 2013-14, 2018. In fact the valley proposed for these housing developments has the highest risk of flooding in the UK. The site at CA1 sits 2-3 metres above water, the pumping stations to the west of Hartlake Road try to deal with removing 1 million gallons of water a day. A land survey was conducted of the CA1 site showing much of the site will flood under current conditions and with climate change this will increase. The solar park recently built on the CA1 site has already flooded. I have also come to discover much of the environment agency data is inaccurate and out of date.

The CA1 Tudeley village (New Town) site is dissected by a railway line which hinders water flow from south to the north. An underwater stream passes under Tudeley Church with a myriad of small tributaries. Much of the site is a functional floodplain level 3 with any further building on the land increasing flood risks both locally and to communities further east down river of the River Medway. Other sites are available within the borough of Tunbridge Wells which are not within a floodplain. The NPPF stipulates the Sequential test and the Exception test with regard to flooding, the proposed Draft plan does not satisfy either of these tests. It was with dismay that I was informed by the head of planning at Tunbridge Wells Borough Council that a flood risk assessment had not been undertaken for the CA1 site Tudeley Garden Village (New town) a site which could be up to 50% flooded with predicted climate change from the Environment Agency. The land sites proposed at Capel East and Paddock Wood also at high risk. It would appear development on the site particularly CA1 would be negligent and could result in loss of life. Any raising of land parcels or bunding cannot be accurately modelled and could have catastrophic consequences. In fact in 2000 The United Nations Economic Commission for Europe stated "human interference with natural processes has increased the threat of flooding and should where possible be reversed and in future prevented". Similar sites at risk from flooding have been rejected at Yatton, Kings Lynn, and South Stanley.

It is important to remember quote Kent County Council select committee in 2007 stated (that significant floods can happen at any time with enough severity to overrun flood defences major incidents such as the 1953 flood devastation, or worse can happen in any season). The simple logic is if you build on or near to flood plains you will be flooded at some time and risk loss of life.

Local Housing Need

Housing numbers and local housing need has not been adequately or rigorously assessed which is a basic and logical requirement. I agree there is a need for some local housing however this should be evenly and fairly distributed throughout the borough.

The local requirement for Capel may actually be some 25 new homes, these being added to those already for sale at the current time, those under construction, and those pending planning permission. The Draft proposed plan would likely create a large dormitory town highly inappropriate for the area. Investigation has revealed previous housing developments in neighbouring boroughs have been advertised by London Estate agents with incentives for commuters to purchase, interestingly many of these homes remain unsold.

The Draft plan bases its housing numbers requirements on 2014 data rather than 2016 data, this is appears illogical furthermore it has come to light that it was not necessary for TWBC to adopt the 2014 numbers. Housing requirement numbers have in fact dropped according to ONS figures which would mean 4000 less homes are required within Tunbridge Wells therefore I would ask that TWBC please use the argument of exceptional circumstances to prevent the proposed development at Tudeley Garden Village.

This allows other land parcels within the TWBC options document to qualify as being suitable for development, some with adequate existing infrastructure and others with existing buildings, and some sites very close to the newly duelled A21.

The Impact Upon Tonbridge

The location of the proposed Draft plan would undoubtedly place both unwanted and unnecessary strain upon Tonbridge infrastructure. Tonbridge already being it is quoted as at capacity with roads full to capacity, car parks over spilling and no spaces for existing commuters at Tonbridge station, the air quality levels at Tonbridge are currently likely to be unfavourable, this without the thousands of extra cars and added buses that would be associated with the proposed Draft Plan. It appears the Draft plan has not been assessed rigorously, Tom Tugendhat MP for Tonbridge has indicated the Soundness of the Draft Plan may be in question!

Water Supply

The impact upon the local water supply is I believe of great concern with strains already on drinking water and shortages, added to this is the real danger of the proposed quarries, and the draft plan development interfering and polluting the natural aquifers and bore holes and wells in Hartlake Road existing in the site at CA1 Tudeley Garden Village (New Town).

Very careful consideration is necessary here, some of the water here being distributed I believe to other parishes within the borough, and it seems a risk too far to jeopardise contaminating public drinking water. I am critically concerned following reports that leachate from landfill at Stone Castle Farm Quarry may have contaminated lakes and possibly the River Medway due to inept thought planning and management, how can residents and the council safely trust and adequately monitor further quarry excavation. If water consumption increases due to these proposed developments water will be dragged up from the wells which are likely to allow contaminated water to enter into the system.

Loss of Valuable Arable Land

To the south of the draft plan for CA1 the land is grade 1 arable, just north over Tudeley Lane and Crockhurst Street fields surrounding the All Saints Church there are crops growing the same crops. Further north on the proposed CA1 site Tudeley Garden Village (New Town) high-quality blackberries are grown this land being rated grade 2 and 3 arable, productive orchards are also present which are I believe protected.

Such high quality land is surely critical to our food supply, and particularly in view of our leaving the EU, this together with environmental pressures and future legislation on flight volumes to import food provides an obvious case for this land to be kept arable. To cover such land with houses driveways and roads would in fact mean the loss of this food production forever. CA1 site alone will deprive the nation of 6,174 tonnes of produce over 5 years.

Biodiversity

The Draft plan appears to go against the NPPF paragraphs 174, 175, and 177 and will likely go against the Environment Bill 2019-2020. No Biodiversity assessment has been undertaken.

The loss of wildlife habitat including endangered and protected species (there are 3 EU protected species in the area, Bats, Great Crested Newts and Dormice note Dormice were noted as in danger on the BBC South East News 13.11.2019 due to loss of habitat and climate change) shows the Draft plan to be inappropriate in both scale and location

Residents of and visitors to the parish currently enjoy open green spaces with numerous footpaths and bridleways across the areas of the proposed site at CA1 Tudeley Garden Village (New Town) and throughout Capel East. An area of concern is the huge increase in domestic animals with such an inappropriate scale of development particularly cats and dogs, (25% of the population own a cat and 25% of the population own a dog source PDSA) dogs and cats would likely have a devastating impact upon wildlife and flora an aspect not considered within the Draft plan. This point is even more relevant following covid 19 with cat and dog ownership having increased significantly.

The light, noise, chemical, and traffic pollution that would emanate from such an incongruous conurbation would change the whole area of Capel forever. This area is rare in so much as it has a very healthy population of Ash trees which the government have spent £6M on Ash dieback research for the UK. Many Veteran Oak trees also exist on or adjacent to the proposed sites including Ancient Woodlands. The Visual Impact would be detrimental to such a natural setting.

Development on such an inappropriate scale in such a naturally long standing ancient landscape can only have a damaging effect. One example is the litter problem that sadly now exists along Tudeley lane and the B2017 since the advent of fast food and drinks outlets at the Tonbridge industrial site.

Albert Einstein stated

"The Natural Balance of Nature is Harmony !

Infrastructure

The drainage facilities at the CA1 Tudeley Garden Village (new town) development are non-existent with very limited drainage infrastructure at Capel and Paddock Wood, the latter suffering from a long history of sewage problems. Our own very efficient and competent MP Greg Clarke has made a speech in the House of Commons in the last few weeks requesting that no further housing developments be undertaken in this regard "without infrastructure in place first".

The building of new road infrastructure requires agreement with Kent county council and the timing of this is unlikely to dovetail with any of the proposed house building. Economic theory points to New Roads attracting traffic and usually higher volumes than existed. The parish of Capel is inherently a quiet parish any new road infrastructure should aim to remove traffic from Hartlake Road, Tudeley Lane and Crockhurst Street the B2017 Road that runs through Five Oak Green to Paddock Wood and to Tonbridge, to ensure this area is pollution free. EU Regulation is strict on this matter and coupled with the Environment Bill will prove a significantly difficult hurdle. No Transport Assessment has been undertaken.

The hospital at Pembury (Tunbridge Wells Hospital) is already at capacity with bed shortages, and doctors surgeries are closing unable to cope with current demand. The situation of shortage of doctors and nurses is not predicted to improve, the proposed Draft Plan will put a potentially crippling burden on our local health infrastructure.

Geology

The geology of the site would appear to make it an illogical choice with a heavy clay susceptible to expansion when wet and shrinkage when dry increasing risk of subsidence in turn leading to a high build cost. Any deep foundations for retaining structures could damage the sensitive mud and sandstones which lie over and control the natural aquifer. Puncturing of these mudstones and

sandstones could have a very serious consequences to groundwater equilibrium. Building to allow water to pass under foundations would only lead to movement of the structure.

Heritage.

The proposed site at CA1 includes two Grade 1 Listed Churches All Saints at Tudeley and the medieval church at Capel and Hadlow Tower will all be screened from view together with other listed buildings. To construct homes and roads around these heritage sites would appear to be legalised vandalism if allowed. Visitors from many countries come to see these famous sites. I understand no Heritage Assessment has been undertaken.

Impact Upon Residents and Health Issues.

The strategy is to master plan this proposal over a 30 year period this would create the use of lorries passing to and from these proposed sites all adding to traffic danger, noise, and air pollution. This all within a small area with existing schools. The EU Commission Science for Environment policy confirmed the loss of healthy life due to UK noise exposure alone to be 1.34 billion euros.

The use of concrete incorporates heat generation into the atmosphere by the chemical process of hydration. Chemicals are then released into the soil from the concrete over years such as alkaline, other chemicals would have to be added to the concrete to prevent sulphate attack as the area is and has been for ever farmland this then seeps into the waterways tributaries, many of which are under ground, contaminating tree roots,(note the Building Research Establishment prepared a document on this subject), and potentially polluting the aquifer before passing into the River Medway.

The current natural open space the residents enjoy together with the footpaths Bridleways and wildlife will disappear and the area slowly degenerate. An example is Poundbury where it is evident garden village new towns do not work in a modern society it seems they work only for utopian theoreticians.

Sustainability & Viability.

The following points would appear to seriously call into question the sustainability of this proposed Draft Plan:

Pollution from the proposed Draft plan including Tudeley Garden Village (New Town) and Capel East is unlikely to satisfy current regulation and The Environment Bill.

Flooding in the site at CA1 and Paddock Wood is De facto and is predicted to significantly increase with the Environment Agency prediction of climate change.

The Geology of the site with clay cap and mudstone and sandstone below will lead to high building costs and very probable foundation movement due to the clay type which is prone to changes in volume with changes in moisture content. Potential purchasers may well find these proposed homes difficult or very expensive to insure. The financial Viability of the scheme would have to be scrutinized and be open to "public view" and assessment. Build costs in difficult sites with heavy clay soils on sloping ground with underground streams and watercourses are notorious for crippling overspend. The site at CA1 is littered with old Bell shaft mines from the 1700s earlier mining works having been carried out in the 1300s this is historically documented.

Infrastructure is not in place and timing and phasing is unlikely to dovetail with housing development. Our Hospital, Doctors Surgeries, Drainage and Roads are already at capacity. There is no guarantee such infrastructure will have funding and less likely to be built or be sanctioned at the appropriate time.

The impact upon Tonbridge town is very significant and the consequences extreme causing an unnecessary over burden and raises questions as to sustainability of the Draft plan and its Robustness under paragraph 35a of the NPPF.

The placing of 60% of the unnecessary housing numbers in one small Parish is wrong.

Surely the most important endeavour to consider here is to strive for morality in our actions our inner balance and our very existence and values depend on it, only morality in our actions can give beauty sense and dignity to peoples' lives. I sincerely hope The Inspector will see through this inherently illogical Local Plan and the very real and irreversible harm and destruction that would occur leaving a wound in this gift of countryside that is Capel and at best a scar for our future generations . Thank You.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The use of Brownfield sites should be adopted together with Blantyre House, other areas include Goudhurst Parish, The Frittenden area, Horsmonden area, Kippings Cross, Land adjacent to Colliers Green. Land at Bayhall, land between Cranbrook and Sissinghurst, Langton Green, Wakehurst, Sandhurst and Iden Green, and wakefield Farm Bennenden. It is understood a site at Castle Hill is also available with road access to the A21.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	<input type="checkbox"/> No, I do not wish to participate in examination hearing session(s)
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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The sustainability of the proposed Local Plan appears unsound. Infrastructure is lacking, building costs will be high to provide (quality homes) that are insurable and will last more than 30 years without need for significant repair particularly on CA1 due to the geology and flood risks. The RICS have confirmed Covid 19 has now increased building material costs and construction prices. The valley has the highest flood risk in the uk and climate change forecasts by the environment agency increase the risks. An independent level survey was conducted of the CA1 site and revealed serious flood risks. Jobs locally are not numerous these developments if allowed will be sold to commuters and may be left empty the strain on the existing infrastructure will be huge together with high pollution and possible collapse of surgeries and threat to an already struggling hospital.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	<input type="checkbox"/> Yes, I wish to be notified of future stages of the Local Plan
--	--

Comment

Consultee	Ann Crosby [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tunbridge Wells [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ann Crosby [REDACTED]
Comment ID	PSLP_307
Response Date	24/05/21 12:00
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Ann Crosby
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is sound	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My daughter has lived in Tudeley since 2008, and will be directly affected by the proposal and its lasting impact on the area.

The name of 'Garden Village' implies that it would be small, green, compact and good for the area, whereas, the Proposed 6000 houses in total, joining the towns of Paddock Wood and Tonbridge, enclosing Tudeley and Capel will create flooding, noise, air pollution and destroy some 600 acres of green belt, an AONB, agricultural land and loss of wildlife.

With climate change we can only expect more rain each year. 15 years of building on this land, putting down concrete, HGV's creating more pollution, will not help our planet.

I believe that this development will cause lasting damage to the environment and a great loss to the area.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mark Daters [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mark Daters [REDACTED]
Comment ID	PSLP_10
Response Date	26/03/21 18:41
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr Mark Daters
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraphs 5.199 (page 153) to 5.299 plus supporting plans , policies and maps (pages 153 to 165).

Policy Map Inset Maps 33, 34

Policy STR/SS 3

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not positively prepared
	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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The Site is nearer Tonbridge than Tunbridge Wells, particularly to the west of the Site which is a different local authority.

Purposes of Green Belt land include "to prevent neighbouring towns from merging into one another (Tonbridge to Paddock Wood based on the proposed development) and "to assist in safeguarding the countryside from encroachment" (surrounding Tudeley and Capel). The proposed development does not consider these purposes.

Such a large scale and concentrated Green Belt development does not consider a further Green Belt purpose to "assist in urban regeneration, by encouraging the recycling of derelict and other urban land. TWBCs original Plan identified multiple Sites spread across the Borough including urban Sites which are far more likely to not impact Green Belt land or impact on a marginal basis spread over multiple Sites.

Whilst the proposed development is within TWBC authority, it is the infrastructure and services including the station and supermarkets in Tonbridge which will be used by the new residents as this will be the local town. Tonbridge High Street is already congested seven days a week demonstrating it is already at maximum traffic capacity. It cannot manage any more. The existing Tonbridge roads cannot be widened or developed to improve traffic flow which is why congestion has increased annually over many years. There appears to be no plan in the Consultation Draft for a new station in Tudeley so residents who commute will use Tonbridge station which also allows a more frequent train service from the other train line serving Tunbridge Wells. Tonbridge will be the favoured commuter station over Paddock Wood or Tunbridge Wells each serviced by one train line compared with two at Tonbridge and a longer train journey costing more.

The closest Grammar Schools are in Tonbridge; Weald of Kent, Tonbridge Girls Grammar and The Judd.

The costs of infrastructure on the Tonbridge & Malling side of the local authority boundary will fall to Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings.

If the B2017 from Tudeley to Woodgate Way at the border of Tonbridge were to be improved as part of the proposed development it would not solve any traffic issue but simply move traffic faster to Woodgate Way but result in the same congestion into Tonbridge.

The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer.

There should be land separating Tonbridge and Tudeley.

I understand the Medway floodplain covers parts of the proposed development. Concreting over fields will increase the potential flood risk and widen the floodplain. The increased potential for flooding will affect part of the proposed development or move the flooding further down the River Medway to areas such as Yalding. Climate change will increase the risks further in the future.

I believe TWBC can challenge the Government housing targets locally since development of Green Belt land can only be made in "exceptional circumstances" which do not appear to have been met for many sites. I would like to see TWBC use this argument to remove the garden settlement at Tudeley from this plan.

I cannot see any benefits fits of this proposed development. It appears TWBC are opting for convenience in response to one landowner rather than seeking numerous smaller developments spread across TWBC requiring less significant infrastructure changes. Tonbridge and TMBC rather than Tunbridge Wells and TWBC will bore the brunt of the resulting insufficient infrastructure, pollution from one concentrated and significant development in one location and permanently remove pleasant and healthy countryside and agricultural land.

Therefore, based on the numerous reasons outlines above the plan is unsustainable.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alex Dave [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Alex Dave [REDACTED]
Comment ID	PSLP_1341
Response Date	04/06/21 15:45
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1

Question 1

Respondent's Name and/or Organisation	Alex Dave
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS 3

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please find this as a response to the local draft plan, and in particular, the plans for Tudeley Garden Settlement (STR/SS 3).

As a resident of Tudeley for over 5 years myself and my family are objecting to the proposal of this "Garden Village". TWBC has 20 wards, you are proposing that you wish to put 50% of it into just a single ward, that being Capel. This inhibits the development of housing, infrastructure and amenities elsewhere on the borough.

You also propose that in East Capel you wish to add 2060 more dwellings where there are already 918 dwellings and a staggering 2800 in Tudeley itself. This is extraordinarily disproportionate to the size of the area and is placing a huge amount of greenbelt land in danger. The PM in 2016 has stated that Greenbelt land would not be placed at risk. It appears that you have disregarded that statement. We would stand to lose 600 acres of Greenbelt land to new housing as well as a further 200 acres quarried via the Kent mineral plan.

As it currently stands there are 2452 people living in Capel if this plan is adopted the population, then the estimates are this population will grow to in excess of 13700+. Most will be using private cars, which in turn will be detrimental to the air quality as well as cause major traffic congestion of which there is already issues due to the 200 plus pupils at Capel school and also the traffic to Somerhill School. Not to mention the huge carbon footprint this will create. Add to this the proposal that a new secondary school next to Capel Primary will add a further 2000 pupils (KCC Guidance). There is nowhere near enough consideration and arrangements within the plan regarding the impact on highways. I urge and invite any planner to visit our house during peak hours on Crockhurst Street and see the current level of congestion during term time. You will soon see that the proposals within the plan will be insufficient to cope with the huge numbers of extra vehicles. We appreciate that the direction of travel is to reduce private vehicle use, but this is not achievable in the short-term future and so the impact on traffic and air pollution has been significantly underestimated.

The Local plan proposes that 15 years + of large construction sites active in Capel with enormous infrastructure issues. The impact of this on the mental health of existing residents should not be downplayed. I fear it would make it impossible to continue living in the village.

Within the plan it states:

"The development provides an opportunity for a new railway station to be delivered on the site to provide rail linkages to London on the Ashford/Dover line (linking to Tonbridge and Paddock Wood). The delivery of a station is not anticipated during the plan period, and provision of a station has not been included in the Council's considerations of this site through the Sustainability Appraisal, or in terms of planning merits or infrastructure requirements. However, the Masterplan makes provision for a station to be accommodated in the future, if this can be realised."

Why has this been included when I believe Network Rail have stated a new station is not possible? This is pie in the sky and included to try and soften the infrastructure blow, but there is no evidence it can ever be realised.

Incredibly the development at East Capel is entirely on a flood plain. Tudeley also has high risk flood areas. Mitigation may fail or move more water downstream to East Peckham, Yalding, Golden Green, Tonbridge and beyond. I am sure you will have photos shared with you of the flooding of the exact areas where this development is planned for.

TWBC is made up of 48 Councillors. Only 1 of these represents Capel. TWBC has received over 1000 comments objecting to the Local Plan's impact on Capel which is way more than any other area. Yet it appears that in 2019 hundreds more dwellings were added to Capel in the revised plan in 2020 with no recognition of the concerns listed in the new documents. This shows an incredibly inept ability to engage with the community. There has been an absolute lack of genuine engagement and respect for current residents throughout this ordeal.

It also shows that despite there being a Reg 18 consultation nothing was done to highlight any of the above concerns. This makes a mockery of the entire process. 97% opposed the plan, there were 1174 comments from 804 people. The only action taken was to (as mentioned above) add more unrealistic goals of increased housing.

I find it quite incredible that 51% of the new housing from the Local Plan is being placed into an area where only 2% of the TWBC population live! It is disproportionate and it should also not be ignored that a lot of the strain (on infrastructure and services) from this development would be on neighbouring Tonbridge and Malling rather than TWBC- a coincidence? We think not.

There was a clear lack of prioritisation given to looking at alternative Brownfield sites. Given that there are vacant offices in Tunbridge Wells such as the AXA building and no real analysis of Castle Hill or Blantyre. Why? It seems that TWBC are taking the easy option by trying to meet their housing targets in one area and decimating this existing area to save the rest of the wards. Due diligence should be completed to further examine these numerous brownfield sites dotted around all wards.

You have been accused by one of your own councillors of a lack of transparency and scrutiny. You are all complicit in your lack of activity and lack of scrutiny about what this plan means for the populations of Capel and also those in surrounding areas. TWBC council leader has even said directly to Save Capel, the group trusted to be the voice of the residents "You will never win!" We have lost any faith in the leadership in our council- a very sad state of affairs when you are elected to represent your residents.

This plan should not be allowed to go ahead. The fallout will be catastrophic for current residents in and around Capel.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Charles Davenport [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Charles Davenport [REDACTED]
Comment ID	PSLP_860
Response Date	01/06/21 20:20
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation	Charles Davenport
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS3 Regulation 19 - Tudeley Village

Question 4

Do you consider that the Local Plan:

Is sound	No
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Complies with the Duty to Cooperate	No
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Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	It is not justified
	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The plan to build a new town at Tudeley Village does not provide accurate data on where the residents for the 2800 houses will come from nor where they will work or travel to. There is no provision for additional public transport links nor other amenities such as supermarkets. The plan uses out of date data regarding the likely demands of use on the local road network. The policy does not take into consideration in sufficient detail regarding the problems which will arise from traffic and public transport to the nearby transport hubs such as Tonbridge Railway station and its parking facilities and the Sainsburys/Iceland in Tonbridge which will likely attract most of the demands of the new village. Tudeley road does not have the capacity to handle the current traffic demand in the mornings let alone when there are a potential 5600 extra road users heading towards the Station at Tonbridge and towards the A21.

5.217 - There is no explanation on how the new settlement will be self containing nor how safe cycling and walking access will be provided to Tonbridge and Tunbridge Wells.

Question 6

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The policy STR/SS3 needs to provide an explanation of where the residents for the 2800 houses will come from and where the likely areas of employment will be located. The policy needs to provide a detailed traffic and transport impact plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Kathleen Davey [REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Kathleen Davey [REDACTED]
Comment ID	PSLP_41
Response Date	19/04/21 13:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Letter
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kathleen Davey
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3: The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I, as a resident here have been asked to provide additional comments to the above. I therefore enclose my feelings as at this time and indeed over the past 2-3 years when this dreadful situation was suggested by you and Council members including the Housing Minister in the Government.

We as residents in the Parish have been unable to live our lives under this heavy cloud of indecision which has surrounded us and, if fact, has blighted our existence.

It actually pains me to have to reiterate what I have already voiced upon ears who have no intention of even listening.

As a home owner and Resident of Tudeley at the above, I at now 87 years of age have resided in peace for over 35 years in beautiful surroundings. How, you wish to deprive me and many residents of this neighbourhood of this peace and subject us to our final years surrounded by a vast area of bricks and mortar disguised in the biggest disaster you are about to plunge us into. You will totally regret your decision if this comes into fruition and which I can only pray, does not.

Money and prestige for some is the main object and financial gain for certain individuals and those involved should be ashamed to put forward this horrendous scheme which will ruin our beautiful landscape for ever.

I am sure if it is your intention to provide homes, Kent possesses plenty of land which could be exploited and which, therefore, would cause less havock to many of us residing here in Tudeley.

My final wish is that this Plan is scrapped and indeed FORGOTTEN for ever.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Eryl Davies [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Eryl Davies [REDACTED]
Comment ID	PSLP_923
Response Date	01/06/21 14:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Eryl Davies
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I have sent a separate email consisting of a screen shot of an email I sent you nearly 2 years ago. Nothing has changed my mind about the proposed developments. It is actually WORSE now since you intend to prevent residents from east Paddock Wood and East Peckham from crossing the railway bridge on Maidstone Road. This means we either pay and park at the Train Station car park or do an extremely long diversion via Badsell Road. Have you visited the junction by Mascalls School recently, since the latest new housing estate was built? The congestion at the traffic light is HORRENDOUS at peak times. You intend to ADD to this by diverting all the above mentioned traffic via this T-junction. It beggars belief!

[TWBC: Email of 05/11/19 reads:]

Even though I am not a resident of Tunbridge Wells Borough I have worked in and around Paddock Wood for 37 years.

It is bad enough having to put up with new developments in the area around Paddock Wood, but having seen the proposed plans for reducing the Green Belt area between Paddock Wood and Tonbridge I am appalled by the idea of unnecessarily building new homes in this beautiful area of the Weald.

The build up of morning traffic during school term is appalling on the road between Five Oak Green (note the colour in the placename) and Tonbridge already.

Also the peace and serenity of Tudeley Church (with its beautiful Mark Chagall windows) would be lost for ever if a housing estate were to appear in the field behind it.

Please reconsider your plans for the future

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Ian Davis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ian Davis [REDACTED]
Comment ID	PSLP_1749
Response Date	04/06/21 15:34
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Ian R Davis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My wife and I have here at Colts Hill since the summer of 1993, her family having lived and worked in the parish of Capel for generations. It remains a beautiful corner of the Garden of England largely unspoilt Green Belt of small hamlets and villages set out amongst small woods and good quality arable land.

The proposed housing development for Tudeley is unsound on a number of important and key issues.

As already stated the area is rural in nature and aesthetics, comprising arable land and small woods. The proposed development is of such magnitude that it will obliterate Tudeley and be a visible blight on the views from across the Medway Valley from Golden Green and East Peckham. Of particular import are the world renowned Chagall windows in All Saints Church. Notable because this is the only church in the world to have all its twelve windows decorated by Chagall. The other three religious buildings with complete sets of Chagall windows are the Hadassah Medical Center synagogue, the Chapel of Le Saillant, Limousin, and the Union Church of Pocantico Hills, New York. When Chagall arrived for the dedication of the east window in 1967, and saw the church for the first time, he exclaimed "C'est magnifique! Je les ferai tous!" ("It's beautiful! I will do them all!") To desecrate the setting of the church by surrounding it with housing is tantamount to vandalism.

Traffic and infrastructure. The proposed plan makes inadequate provision for accommodating the substantial increases in traffic levels in the immediate and wider area. The B2017 linking Tonbridge to Paddock Wood is a winding rural single carriageway with pavements only provided within Five Oak Green. Within Five Oak Green residential parking on the carriageway already impedes the smooth flow of traffic which is exacerbated during the morning rush hour past the Primary School when children are being dropped off. I have commuted daily from Colts Hill through to the A21 at Tonbridge for over 25 years and this 4 mile journey can often take up to 40 minutes if there is the simplest obstruction. Added to this morning congestion is the school traffic entering the Schools at Summerhill where the queues there tail back onto the carriageway and can cause tailbacks back beyond the turning for the Hartlake Road. Traffic heading easterly from the proposed development would have to negotiate Five Oak Green itself before arriving at the A228 where if then turning South towards Tunbridge Wells will substantially add to the significant congestion heading up Colts Hill. Other minor roads in the area are already subject to significant levels of rush hour traffic and many of these are single carriageway country lanes. Looking across the north of the Tunbridge Wells Borough poor road infrastructure provision is evident wherever you look. The A228 from the B2017 south to the A264 interchange with the A21 has been subject to a proposed bypass for over 30 years, the A228 being the important link between the two primary Hospitals serving West Kent. But the A264 itself as it heads into Tunbridge Wells is substantially congested not only at peak times all the way through to the center of the town. Similarly

at the western end of the B2017 turning south westerly towards the A21, the A26 here is also heavily congested at rush hour and traffic turning north westerly on the A26 as it bypasses Tonbridge to its east is already beyond capacity with substantial rush hours queues. Adding 1000s of additional vehicle movements is simply unsustainable and it must also be noted that Tunbridge Wells Borough Council has not adequately consulted the Tonbridge and Malling Borough Council on which a substantial proportion of this additional traffic will fall.

It must be noted that these 1000s of potentially new residents will have to travel to work and school. There is no provision for cycleways or pavements within the plans, existing bus routes use these same already congested roads and there are no plans to provide sustainable levels of local employment.

There are further concerns regarding the potential consequences of this new development upon the water table and increases in flooding of the surrounding area. To the north of the proposed development lies the Medway and its flood plain and to the east Five Oak Green village which has been subject to some serious flooding in the last decade and which frequently has large tankers adding to the congestion on the B2017 when extracting excess water from the Alder Stream. This process is not limited to Five Oak Green, only today as I travelled along the B2017 there was a tanker in the road alongside the water facility in Tudeley itself.

In summary, a) the proposed development is inappropriate in the Green Belt, b) destroys the unique setting of the world famous Chagall windows in All Saints Church, c) will completely gridlock the entire road network in this rural corner of the Borough, d) the plan is not properly integrated either within the Borough itself or strategically within the wider area of West Kent.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

This proposal is not sound and inappropriate in this rural setting.

Comment

Consultee	Bryan Dickson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Bryan Dickson [REDACTED]
Comment ID	PSLP_1653
Response Date	04/06/21 12:45
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Bryan Dickson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been resident in Tonbridge for 30 years and know the area well. I am concerned about the TWBC proposed plan for a number of reasons, some of which are detailed below.

What is also noticeable by its absence is any reference to consultation and co-operation with Tonbridge and Malling BC regarding the affects this plan will have on their residents.

This plan is not considered sound for a number of reasons which are not listed below in any specific order of importance.

This plan will significantly impact local infrastructure. For example (*this list is not exhaustive*):-

- . increased traffic on roads will result in increased local congestion, decreased air quality and an increased carbon footprint (queues on the A26 for example are already lengthy, particularly at peak times);
- . increased use of already overstretched local peak-time rail use is inevitable based on the local connectivity with London and elsewhere (before I retired I commuted to London daily and noticed that trains were increasingly very busy in peak time);
- . there will be increased health care requirements including hospitals, GP surgeries, dentists, etc. which are already strained in the area (getting an appointment is already very difficult);
- . an increased demand on utilities;
- . significant increased demand for local school places which have the additional issue of dropping off and collection times.

While these points are noted in the plan there is no definitive indication given of how TWBC will "work with" various agencies and providers to deliver the expected increased infrastructure requirements. It is not clear if these will even be possible to deliver in the short and longer term.

Completion of the plan will take over 15 years resulting in increased congestion, and significant disruption to local people. As the proposed development is on the outskirts of TWBC this plan gives all of the benefits of council tax to TWBC but all of the disturbance and hassle to Tonbridge & Malling (e.g. all relevant local infrastructure issues as noted previously and the increased demand for car parking for residents, commuters, shoppers, etc.)

The number of dwellings in the plan is totally disproportionate to the area. The proposal would represent a 500%+ rise in the number of dwellings in Capel. I visit Capel regularly and the rural atmosphere would be destroyed if the planned housing goes ahead). Also interesting is that the Councillor for Capel only represents 2% of the total number of TWBC Councillors.

The proposal is to build on a known flood plain and high-risk flood area. The increased "concreting over" will result in an increased risk of flooding to the area and/or move the water downstream to other surrounding areas such as Tonbridge, Yalding , East Peckham , Golden Green, etc. where flood

mitigation fails. If dwellings are subsequently flooded as a result of the building, this is likely to increase house insurance costs and could result in flood insurance being unobtainable which would have a dramatic and undesired effect on the saleability of property in the area. Should this happen, it is possible that affected residents could have a potential claim against TWBC and their Councillors.

The proposal will destroy about 600 acres of green belt land. Why would this be considered where there are alternative brown field sites that may not have been adequately studied and considered. Equally, a substantial acreage of good quality agricultural land will also be lost forever. This is in addition to a further 200 acres that are due to be quarried as part of the Kent Minerals Plan. This will turn what is now a rural Kentish Parrish landscape into just another concrete conurbation – once green belt land is gone it can't be replaced!

It is also understood that Hartlake Road which links Golden Green to Tudeley may be closed to all traffic if this plan is not approved. A large number of individuals use the road regularly and its closure will add to the congestion on the main road from Tonbridge to Tudeley. This is already highly congested and will increase the pollution from stationery or slow-moving vehicles. There has been no consultation on this because if there had been there would have been a far higher number of objections received.

If TWBC have proposed this plan to meet government targets, what efforts have been made to advise Central Government that their house building targets are not feasible in this area, as Sevenoaks have done? The South East of England is already densely populated and further extensive building and urban sprawl as proposed will add to emissions, further reduce green spaces, and contribute to the further deterioration to local and global climates.

It is clear that TWBC have ignored the unprecedented local response at Reg 18 and have not adequately addressed the concerns raised. Why has there been such a lack of scrutiny and transparency to this plan as it affects a far larger area and population than the corner of the TWBC ward where it is proposed the development is situated? Engagement with the local community in Capel and the surrounding area that will be affected has been totally ineffective as the majority of people that will be personally affected by this plan do not appear to have been honestly and robustly advised of the true effect on them if the plan is agreed. This seems totally inequitable.

Question 6

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- . The implications of this plan are not sufficiently or widely known about. This must be rectified by the publication and circulation of a transparent document advising all citizens in all affected areas of the potential impacts of the plan and their opportunity to respond to these.
- . The publication of a detailed plan agreed with all relevant agencies and providers affected by the proposal.
- . Publication of how TWBC have adequately addressed the objections raised in Reg 18.
- . The publication of discussions with Tonbridge & Malling BC relating to this proposal and its effects on their residents.
- . Revisit feasibility of alternative brown-field sites.
- . A substantial reduction in the number of dwellings proposed (maximum 10% of original plan) with these to be on brown-field sites.
- . Push back by TWBC on Central Government housing target for the area.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_16

Comment

Consultee	Malcolm Dorrington [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Malcolm Dorrington [REDACTED]
Comment ID	PSLP_248
Response Date	21/05/21 13:31
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Malcolm Dorrington- Representation letter.docx (4)
Question 1	

Respondent's Name and/or Organisation	Malcolm Dorrington
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3 for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
----------------------	------------

Is sound	No
----------	----

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in the borough for virtually my whole life and been a resident of Paddock Wood for 35 years, and it seems like we have been having construction work going on here for at least half of that time, at present there are three large developments underway at the same time, all of which is being carried out on former agricultural land, On top of which TWBC want to build another 13,000 houses again on prime agricultural land, this figure is 50% of its target, TWBC are saying that the government is asking to much.

Across the whole borough Paddock Wood and Capel are at the most risk of flooding with the ever increasing autumn and winter rainfall flooding issues have worsened.

We do not have the infrastrucuter to cope with more housing, the schools are full, the doctors surgeries are full and with the advent of the forthcoming Churchill Retirement Home development on Commercial Road we are losing five existing shops with nowhere to build more.

The country side next door which became so important to the health and well being of residents during the pandemic will be gone forever and there will be no there will be no green space in between, we will no longer be a rural area, we will be a giant urban sprawl.

Please see the document attached under question 8

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please see the document attached under question 8

[TWBC: text of supporting document copied here for ease of reference]:

I have lived in the borough for virtually my whole life and been a resident of Paddock Wood for 35 years, and it seems like we have had major construction work going on here for at least half that time, at present there are three large developments underway at the same time, all of which are being carried

out on former agricultural land, on top of this TWBC want to build another 13,000 houses which is 50% of its target, they are actually claiming that the government is demanding too much.

Across the whole borough Paddock Wood and Capel are at the most risk of flooding; it is a fact that with every new development and ever increasing autumn and winter rain fall flooding issues have worsened. It is also a fact that local doctor's surgeries and schools are full, the plan mentions building more surgeries but will they find doctors to fill them, the surgery in neighbouring East Peckham has been closed for a number of years. A new school was supposed to have opened in September 2018 but has never been started; the plan mentions more shops in Paddock Wood but five existing shops are to be demolished to make way for a Churchill Retirement home development in the main street. The National Planning Framework is clear that poorer quality farmland should be preferred, yet the land in question is shown in predictive maps produced by Natural England to be some of the most agriculturally rich land in the borough, yet the planners jumped on it because the current owners put it forward, obviously to line their own pockets, they did not consider the effect it would have on food production. This area is historically a farming community, it was the place where thousands of Londoners used to travel to work in the hop fields, for them it was a holiday as well and for many the only times they got to see the countryside, the hops have mainly gone but the area is still rich in orchards and arable farming. This area is also full of public footpaths, during the pandemic it has been a godsend for the health and wellbeing of local people, it was the countryside next door, easily accessible by foot when travel restrictions were introduced, if the local plan goes ahead this will be lost forever to ourselves our children and grandchildren.

The National Trust, the Woodland Trust and Countryfile are all engaging in planting thousands of new trees, TWBC want to rip out thousands of existing trees, orchards and hedgerows, the very heart of our local countryside, this will make flooding worse and decimate wild life.

The subject of overdevelopment in Kent and the South East has already aired in Parliament by Teresa May saying 'wrong homes are being put in the wrong place', Sir Roger Gale has also criticised the development of agricultural and green belt land in Kent.

The final issue is that if this goes ahead there will be no separation between Paddock Wood and Tonbridge, there will be no greenbelt in between, we will no longer be a rural area, we will be a giant urban sprawl, a giant concrete slab.

If you would like to attach a file in support of your comments, please upload it here. [Malcolm Dorrington- Representation letter.docx \(4\)](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_127

Comment

Consultee	Laurie Dunkin Wedd [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge TN9 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Laurie Dunkin Wedd ([REDACTED])
Comment ID	PSLP_1952
Response Date	28/04/21 11:10
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.6
Files	PSLP_1952_L Dunkin Wedd_supporting information.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Laurie Dunkin Wedd
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Dear Local Planners,

Thank you for offering the opportunity to respond in writing:

[TWBC: copy of part of Local Plan website duplicated]

You have made the mechanism for responding so complex and structured that I cannot negotiate it: I am sure I am not alone. This will undoubtedly have reduced response - and the cynic in me asks if perhaps this is the outcome you had hoped for?

I am therefore sending you a topped and tailed printed copy of my previous response: nothing has changed.

The the spirit of democracy, I hope you will find a way to forward this with all the other responses.

[TWBC: posted response has been copied here for ease of reference]:

[TWBC: for images, maps and charts, see full representation attached].

The Right Homes In The Right Places? A response to TWBC's Draft Local Plan

February 2017: The government calls for 'the right homes in the right places'. [Fixing our broken housing market. A housing white paper]

July 2019: TWBC responds with the wrong homes in the wrong places.

[Tunbridge Wells Borough Draft Local Plan Regulation 18 Consultation Draft]

The Right Homes In The Right Places?

Contents:

- 1 Personal Statement
- 2 The Right Homes? National guidance not observed by TWBC. Why building new homes willy-nilly will not help solve the housing crisis. Why building the right type of homes is crucial. How affordable and social housing are desperately needed. Why the draft Local Plan fails to deliver. i) What TWBC is required to do ii) There's no housing shortage - there's a crisis iii) So where have all the homes gone? a) Some have several while others have none b) Buy to let reduces the market c) The top of the market sequestered iv) How should Tunbridge Wells respond? v) Affordability - what is it?
- 3 In the right places? Why building on Green Belt is counter-productive. How building on watershed above the flood-prone Medway endangers downstream communities. The danger to heritage assets. Why the draft Plan's transport strategy is unachievable. i) Green Belt ii) Flooding iii) Heritage assets iv) Transport
- 4 Climate change and the environment Even UK Parliament accepts climate crisis. New research supersedes TWBC plans.
- 5 Can TWBC deliver? Recent and not-so-recent projects suggest a lack of competence. Neighbouring councils not apprised. TWBC claims a firm evidence base not possible in the time. i) A history of failure ii) A failure to consult iii) Evidence base impossible in the time iv) Non-compliance with NPPF
- 6 Appendices
- 7 **Personal statement**

My beloved mum died just over a year ago: we buried her at All Saints' Tudeley. She loved All Saints' Tudeley, and served for some years as secretary of the PCC. She was passionate about the countryside, and was a lifelong member of CPRE. We thought it was so appropriate that from her grave one could see the wonderful view across the Medway valley:

It had given us great comfort to know that she was to be buried in sight of this beautiful rural view, one of our favourites in Kent. My wife wishes to be buried at Tudeley, and as a local, born and bred in Kent, it was my hope to be buried there too.

So you can imagine our distress when we saw the plans for the proposed Tudeley Village. It was devastating to think that there might be a new housing estate within a few yards of our graves. It is hard to see how this will 'respect the setting of... All Saints Church'.

I love to hear the skylarks singing from the field to the south of the church; how sad if they must go.

[TWBC: see image in full representation attached]. The ground has now settled enough for a headstone, and we had chosen the inscription from Psalm 121: 'I will lift up mine eyes unto the hills'. That inscription is looking bitterly ironic now - if it is to look like this:

[TWBC: see image in full representation attached].

That's my personal sadness.

But there are also innumerable reasoned arguments against this project. Here are some of them. **2. The Right Homes?**

1 i) What TWBC is required to do

"The Plan is required to meet the full assessed need within the borough for market and affordable housing of 678 per annum" [Draft Local Plan 2.31 page 27]

This sounds incontrovertible, doesn't it?

But it simply isn't true.

Here is the latest government advice on the subject:

"The National Planning Policy Framework is clear that, to enable effective planning of new homes, local planning authorities should start the plan-making process with a clear understanding of the number of new homes that they need in their area.

While this is an essential first step, it is not the only stage in the process. Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need.

These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest.

They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."

[www.gov.uk/government/publications/fixing-our-broken-housing-market]

So it is clear that:

- . TWBC must balance housing need with environmental considerations
- . TWBC cannot determine local housing need until they have consulted other authorities

Neither of these conditions has been met. TWBC's draft Local Plan has not followed NPPF guidelines and is therefore unsound in general and in detail.

The following pages demonstrate how far TWBC's plan is from meeting these - and other - conditions. * *There is NO housing shortage! (But there IS a crisis.) The UK has 28.1 million residences (ONS 2014) and 27.6m households (ONS 2018) * The crisis is a shortage of AFFORDABLE HOUSING Average UK home costs eight times average earnings (Conservative Party Conference 2017) * Tunbridge Wells has a very poor record of provision of AFFORDABLE HOUSING 1,705 needed, just 580 provided in 2012-2017 (W Kent Housing & Homelessness Strategy) * There IS a problem of distribution 1.5m people own multiple homes (ONS) while others have none at all * There IS a problem of inequality UK inequality is second worst in Europe (OECD Social and Welfare Statistics 2017) * There IS a problem of money laundering and tax evasion UK property market is particularly attractive (draft Registration of Overseas Entities Bill 2018) * The Tunbridge Wells Borough Draft Local Plan will address NONE of these problems Green Belt provides executive housing, not affordable homes (CPRE Oct2019) * Instead the Tunbridge Wells Borough draft Local Plan will create a ghetto for the wealthy Average house prices: SE England = £383,422, Tudeley = £715,000 [Zoopla]*

1 i) There's no housing shortage - there's a crisis

We have all heard that we are short of millions of homes, and that we must build hundreds of thousands of new ones a year to address the situation. TWBC's draft Local Plan appears to agree:

"The rising household numbers, coupled with an ageing population, mean that the Council will continue to need to provide a mix of housing types and sizes, including specialist forms of housing. This presents a challenge for the new Local Plan, as it will need to facilitate the delivery of affordable housing... [Draft Local Plan, section, 2.30 p27]

Whilst it is well-known to almost everyone, it's worth asking if this housing shortage does, in fact, exist?

It does not.

So says Ann Pettifor, Director of Policy Research in Macroeconomics, Fellow of the New Economics Foundation, and author of *The Case for the Green New Deal*. And the statistics back up this view:

"In 2014, there were 28 million dwellings in the UK, but only a predicted 27.7 million households in 2016. As the director of consulting at Oxford Economics, Ian Mulheirn, highlights, London's number of dwellings grew faster than the number of households between 2001 and 2015." [www.theguardian.com/commentisfree/2018/jan/27/building-homes-britain-housing-crisis]

The Office of National Statistics confirms it:

[TWBC: see image in full representation attached].

[<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2018>
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ukperspectives2016housingandhomeownershipintheuk/> 2016-05-25]

1 ii) So where have all the homes gone?

And yet, there is certainly a housing crisis, characterised by increasing homelessness and a shortage of homes for first-time buyers, making it impossible for our young people to get onto the housing ladder.

According to Theresa May addressing the Conservative Party Conference in 2017, the average UK home cost eight times average earnings; mortgages are limited to 4.5 times salary.

Where does the problem lie? How can be it that we have more homes than families, and yet still not enough homes for everyone?

1 a) Some have several while others have none

First of all, some people have several houses, while others have none. "At the time of the 2011 Census, 1,570,228 usual residents in England and Wales (2.8 per cent of the usual resident population) reported having a second address in another local authority in England and Wales, that they used for 30 days or more each year". [www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/2011censusnumberofpeoplewithsecondaddressesinlocalauthoritiesinenglandandwales/2012-10-22]

1 b) Buy to let reduces the market

Second, an increasing number of property owners own homes that they do not live in.

In recent years, buy-to-let has grown exponentially, removing homes from the sale market. Between 1999 and 2015, lenders advanced 1.7 million loans for buy-to-let houses, according to the Council of Mortgage Lenders. This trend was especially marked in the south east, as the chart shows.

[TWBC: see chart in full representation attached].

[Council of Mortgage Lenders cml.org.uk]

That's 1.7 million homes removed from the market - fully 6% of the total. Their owners are wealthy enough to own two or more houses, and they rent the spare ones out, at a profit, to people who cannot afford to buy a house.

So those who can afford to own more than one property make an income from the rent paid by people who can't afford to buy even one.

1 c) The top of the market sequestered

Thirdly, property at the top of the market is made unavailable through tax avoidance and money laundering.

The National Crime Agency suggests that "the scale of money laundering impacting the UK annually is in the hundreds of billions of pounds". [www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-terrorist-financing]

“£180 million worth of property in the UK has been brought under criminal investigation as the suspected proceeds of corruption since 2004”, said our local MP and then Business Secretary Greg Clark, introducing the government’s plan for a Register of Overseas Entities. [www.gov.uk/government/news/world-first-register-to-crack-down-on-criminals-laundering-dirty-money-through-uk-property-market-to-go-live-by-early-2021]

In 2015 the London Mayor’s office reported that 36,342 London properties were held by offshore haven companies. Not even the Land Registry knows who owns these homes. [www.london.gov.uk/questions/2015/1366]

According to the Standard, “Land Registry figures also show that in just one deal signed off by Boris Johnson in 2011, at Riverlight Quay in the Nine Elms regeneration area, 15 per cent of the homes sold so far have been bought by foreign firms.” [www.standard.co.uk/news/london/revealed-how-foreign-buyers-have-bought-100bn-of-london-property-in-six-years-a3095936.html]

Almost one in ten (9.3 per cent) properties in the borough of Westminster were owned in 2016 by offshore companies, say Transparency International. [www.independent.co.uk/news/uk/crime/the-uk-is-a-global-corruption-centre-campaigners-claim-a7058126.html]

Is this a London thing, entirely irrelevant to Tunbridge Wells?

Not at all. The UK total is certainly much more. In 2015, Private Eye’s research linked more than 100,000 land title register entries to specific addresses around the country.

And it’s not just someone else’s problem: two-thirds of the purchases were made by companies registered in just four British tax havens - Jersey, Guernsey, the Isle of Man and the British Virgin Islands. [www.private-eye.co.uk/registry]

OECD figures show that UK incomes are already the most unequal in Europe, save only for Lithuania. The people at the bottom of the housing ladder have no hope whatever of buying a home, however many we build.

[TWBC: see chart in full representation attached].

Some people own many homes, whilst other people have none. It’s a problem not of housing shortage but of inequality, and as Pettifor says, you can’t build your way out of that.

We will not address the gap between rich and poor by allowing already wealthy landowners and property developers to submerge Tudeley under concrete.

iii) How should Tunbridge Wells respond?

It is obvious that these are structural inadequacies, quite out of the power of TWBC to affect, and more suitably addressed at national and international level.

But TWBC cannot just carry on building executive homes on Green Belt as if these issues did not exist.

It is crucial that TWBC plays its part. It must keep up to date with recent analysis, it must deal with the problems as best it can, and if necessary it must respond to government that the portrayed housing demand is inaccurate, and the imposed solution (just build more houses) unworkable. Sevenoaks’ response to government has been imaginative, though controversial.

Have TWBC taken any account of any of these meta-problems? Apparently not: it seems they have swallowed whole and unquestioningly the view that any new houses, built anywhere, are a good thing. TWBC’s response has been merely supine.

And yet the only people who will benefit from Tudeley New Town will be the property developers and the land-owner - whose own assets may already be offshored to Ireland for tax.

What kind of property will actually help to counter all these threats? An estate of Persimmon Homes, Dandara and Berkeley homes is not the solution. Nor is a luxury Poundbury development, commanding prices one third higher than those around it. What is the local situation in Tunbridge Wells, and how should TWBC respond?

Answering a 2017 Freedom of Information Request by Chris Gerry, TWBC stated that there were in 2017 just 20 rough sleepers in Tunbridge Wells. [www.whatdotheyknow.com/request/information_on_rough_sleepers_in_FOI_F06396]

And on March 31 2016, there were 994 households on the borough council’s housing register, of whom 430 needed one-bedroom accommodation, and 363 needed two-bedroom. [West Kent Housing and Homelessness Strategy]

TWBC bases its plan on national and local housing need, using Central Government's 2014 household projections data [TWBC Housing Supply and Trajectory Topic Paper, p1]. This data is five years out of date, and has been superseded by more recent - and much lower - projections.

Only on 12 September 2019, Housing Minister Esther McVey MP announced a crackdown on developments on the nation's Green Belt, saying:

"Once the Green Belt is built on it's often gone for good: that's why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy". [Ministry of Housing, Communities & Local Government, 12 September 2019]

Perhaps TWBC's aim is to provide homes for social rent?

These would certainly be the only type of homes that would be immune to the inflationary effect of oligarchs, investment funds and offshore trusts. They would not contribute to house inflation. And they would actually begin to tackle TWBC's local housing need. And there is good evidence that council houses are increasingly being seen as the local solution.

After all there have been famous recent successes such as Norwich, winner of the 2019 RIBA Stirling Prize for its Goldsmith Street development, or the Bourne Estate in Holborn.

[TWBC: see image in full representation attached].

[Council housing: it's back, it's booming and this time it's beautiful - Oliver Wainwright, Guardian, 20 June 2019]

And mayor of London Sadiq Khan has negotiated a £1bn fund from central government to build 11,000 new council homes over the next four years, set explicitly at social rent levels.

[<https://governmentbusiness.co.uk/news/24102018/%C2%A31bn-plan-build-11000-new-london-council-homes>]

Perhaps TWBC has something similar in mind?

But the phrases 'council house' and 'council housing' are entirely absent from the draft local plan. Nor does the term 'housing association' appear. The words 'social housing' appear only as a definition on page 529. In fact, TWBC seems to have entirely overlooked a number of modern trends in housebuilding.

Whatever the reason, Tunbridge Wells BC is clearly not about to embark on on a major programme of council house building.

So the focus is firmly on affordability: in its West Kent Housing and Homelessness Strategy, TWBC speaks almost exclusively about affordable housing. v) Affordability - what is it?

[TWBC: see image in full representation attached].

[www.tunbridgewells.gov.uk/residents/housing/affordable-housing/west-kent-joint-housing-and-homelessness-strategy]

The draft plan is similarly ambitious for affordable homes. This may be a panic reaction to such unfavourable headlines as 'The borough is falling woefully behind... in 2013-14 just 36 affordable homes were delivered...' [www.kentlive.news/news/kent-news/affordable-housing-hard-come-tunbridge-492345]

But no numbers are given. And what is meant by 'affordable'? The national planning policy definition is homes that cost 20% below the market rate or less. [NPPF Revised July 2018, Annex 2]

The average house price in Tudeley is £715,000. [www.zoopla.co.uk/house-prices/tudeley]

By the NPPF definition, then, an 'affordable' home would cost up to £572,000. **Who will buy an 'affordable' home in Tudeley?**

The average house price in Tudeley is £715,000. [www.zoopla.co.uk/house-prices/tudeley/]

By the NPPF definition, an 'affordable' home would cost £572,000.

According to Halifax, the average deposit put down by those buying their first home in the first half of 2018 was 16%. [http://static.halifax.co.uk/assets/pdf/mortgages/pdf/halifax-first-time%20buyer%20review-13-january-2017-housing-release.pdf]

16% of £572,000 is £91,500, leaving a balance of £481,000; using the standard loan-to-income ratio of four-and-a-half times income, we can see that this 'affordable' home will only be available to those with an income in excess of £107,000 pa.

With a £91,500 deposit, a Halifax tracker mortgage over 35 years for the balance of £481,000 [www.moneysavingexpert.com], will have monthly repayments of £1,928 for 26 months, and then £2,539 for 22 years and 10 months - or £30,468 per year.

The average salary for a registered nurse in the UK is £24,664 [www.payscale.com]. The national average salary for teachers is £30,097. [www.glassdoor.co.uk]

Perhaps the new homes will be priced lower than average house prices in Tudeley? That's not what has happened in Poundbury, on which the new development is being modelled.

Poundbury homes are now 27% more expensive than those in Dorchester, just walking distance away. [www.rightmove.co.uk/house-prices/Dorchester.html]

[TWBC: see image in full representation attached].

If that happened in Tudeley, the new homes would not cost £715,000, but a whopping £908,000.

In fairness, however, maybe we should compare the new housing not with Tudeley's luxurious homes, but with those in less-eligible Five Oak Green nearby. The average house price paid there is a mere £512,500 [www.zoopla.co.uk] - though applying the Poundbury/Dorchester factor would take that to £650,000.

These prices are still not affordable for our teachers and nurses.

And there won't be many of such houses, either. Building on Green Belt land turns out not to produce many affordable homes: located in beautiful rural settings, the houses tend to be overwhelmingly 'executive' (ie expensive) houses.

In fact, 'affordable' homes make up just 13% of those built on land that was previously Green Belt. [CPRE Report 'Space to Breathe' October 2019]

So of our 2,800 Tudeley homes, 2,436 (87%) will be at full price - something close to a million pounds. Of the whole estate of 2,800, just 364 will be at <80% of full price - probably not less than £650,000.

So 364 'affordable' homes at £650,000? This is still a long way from the 1,200+ needed as identified by TWBC's West Kent Housing & Homelessness Strategy.

If the objective is to generate affordable housing in our area, this seems an oddly inefficient way to go about it. **3. In The Right Places?**

1 i) Green Belt:

TWBC Development Strategy:

"Prevent urban sprawl by keeping land permanently open"

"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open to maintain the character of the Green Belt. Once established, Green Belt boundaries should only be altered in exceptional circumstances and should be fully evidenced and justified, through the preparation or updating of a Local Plan." [TWBC draft Local Plan 4.48]

TWBC's own analysis of Green Belt of July 2017 identified five purposes:

- . Purpose 1: Check the unrestricted sprawl of large built-up areas;
 - . Purpose 2: Prevent neighbouring towns from merging;
 - . Purpose 3: Assist in safeguarding the countryside from encroachment;
 - . Purpose 4: Preserve the setting and special character of historic towns; and
 - . Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land
- [Tunbridge Wells Green Belt Study, July 2017, Stage Two, section 1.2]

The development proposed would appear to fail at least on the first four of these counts.

TWBC also admits that the Local Plan "does not designate other land as 'replacement' Green Belt to replace that to be removed". In other words, there will be a net loss of Green Belt; the plan offers to mitigate this, but does not specify how.

The Green Belt Study (July 2017) determined a Very High Level of Harm to the Green Belt Associated with Release of Broad Areas in an area covering Tudeley; but Tudeley is not examined individually. Presumably the Tudeley plan came in too late for inclusion - has proper consideration been given to these issues - or is this another sign that the plan has been rushed?

[TWBC: see map in full representation attached]. [Tunbridge Wells Green Belt Study, July 2017]

Comparison is made with other nearby boroughs. TWBC notes that “Sevenoaks District Council is not proposing to wholly meet [sic] its housing need”, and that “the constraints applying to Sevenoaks apply similarly to this borough”. [TW Draft Local Plan 4.8, page 34]

Government analysis of Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest shows that Sevenoaks has 94% of such areas, leaving only 6% of other kinds, while TWBC has only 75%. In other words, 25% of TWBC’s area is NOT Green Belt, AONB or SSSI.

[www.gov.uk/government/uploads/system/uploads/attachment_data/file/644783/Housing_Need_Consultation_Data_Table.xlsx]

Clearly Sevenoaks can build very little if at all without infringing protected areas. But despite making the comparison, TWBC is entirely different, with 8,000 of its 33,000 hectares available for development.

But TWBC’s draft Local Plan takes no account of this. Instead it plans to build a large portion of its new homes entirely on the 22% of its land which is Green Belt. It’s hard to see this as anything but perverse.

[TWBC: see map in full representation attached]. [Map from Draft Local Plan Summary leaflet, pp4-5, my annotation]

TWBC’s strategic objective number 9 is “To establish garden settlements as a model for the future delivery of development in the borough.”

TWBC’s argument is that Tudeley is the only place they can put such a settlement.

But it is to be the model for others. If Tudeley is the only possible location, then where are these other future settlements to be?

And if there are other possible sites, why are these not being considered now?

TWBC admits that the convenience of dealing with just one landowner is a factor in its decision. The inspector may consider that mere convenience should not drive decision-making in the planning arena.

1 ii) Flooding:

The European Commission’s guidance on Flooding Best Practice - though long - is well worth reading. It’s pretty clear that no one at TWBC has done so. Here’s a flavour:

“human interference into the processes of nature should be reversed” “restore rivers’ natural flood zones” “strategy should cover the entire river basin area” “one should not pass on water management problems in one region to another” “shift from defensive action against hazards to management... [to] include rare events” “flood protection is never absolute, and may generate a false sense of security” [European Commission Environment Directorate: Best Practices on Flood Prevention, Protection and Mitigation: https://ec.europa.eu/environment/water/flood_risk/pdf/flooding_bestpractice.pdf]

A cursory look at the Environment Agency’s long term flood risk maps shows how seriously we must take this problem. It is not sufficient to kick it into the long grass to be dealt with at the masterplanning stage.

[<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>]

[TWBC: see image in full representation attached].

The topographical map shows how adding impermeable surfaces in the suggested area will create rainwater flows downhill directly into the Medway:

[TWBC: see map in full representation attached].

Further maps appended.

There must be huge concern for communities downstream, such as Maidstone or Yalding, so heavily hit in 2000 and again at Christmas 2013.

[TWBC: see image in full representation attached].

Recent plans to protect this part of the Medway basin have been dropped, leaving the area especially vulnerable. The cost of the 2013 flood to local business alone was estimated at £100m.

[www.bbc.co.uk/news/uk-england-kent-36973257]

Acknowledging the huge risks, TWBC’s plan offers: ‘flood storage/attenuation/mitigation areas to reduce the flood risk to particular existing residential areas in Five Oak Green and Paddock Wood’. [Policy STR/CA 1, page 156] The details of such mitigations are left to the masterplanning stage - when it will be too late to pull back if such mitigations turn out to be impractical or uncertain.

TWBC's mitigations are unspecified - dreamt up on the spur of the moment, perhaps? There are few strategies that will mitigate covering 600 acres of farmland in tarmac. As the EU says, the best mitigation is not to do anything so unsustainable in the first place.

iii) Heritage assets:

[Draft Local Plan, p158: "particularly respect the setting of heritage assets, especially All Saints Church... (see Policy EN 7: Heritage Assets)]

I'm not the only one who loves Tudeley Church: it is visited by many thousands of international tourists every year.

In just one six-week period between 20 August and 10 October, All Saints' visitors book reveals visitors from Denmark, Germany, France, Switzerland, Ireland, Australia, Georgia, Ecuador, South Africa, Belgium, Spain, Belarus, Netherlands, Canada, Japan, Gibraltar, Israel, Greece, Czech Republic, Italy, Norway, Egypt. [Analysis of All Saints' Tudeley Visitors' Book - appended]

The car park is routinely occupied by coaches of 30-50 seats or more. In the six months to 1 October 2019, the church calendar shows 84 visiting groups (defined as being 8 or more people). If the average group consisted of just 40 people, that is 2,000 visitors a year. [www.tudeley.org/dailycalendar.htm]

Of course, the vast majority of visitors come independently. Between April and October, 66 pages of the visitors' book were filled. Each page has 21 lines, giving at least another 1,000 visitors. [Visitors Book, All Saints' Tudeley]

How many did not bother to sign? Twenty minutes spent in the church reveal that only a tiny minority do so. The total number of visitors per year is certainly in excess of 10,000.

Many stay in the area, and even more use local restaurants and pubs: they generate significant income for the area. [ITN News, interview with Aline Koehler-Price, Poacher & Partridge, Tudeley, July 9, 2019]

All Saints' location is part of the attraction. A world-famous artwork in the middle of fields and woods is a significant draw. A world-famous artwork in the middle of a housing estate? Not so much.

According to Visit Kent, tourism's total value to the local economy has risen to £278 million a year. Is it really wise for Tunbridge Wells to jeopardise All Saints' contribution to that? [www.timeslocalnews.co.uk, 17th January 2019]

So far we have looked only at numbers. Artistically speaking, how important is it really? According to Simon Jenkins' 'England's Thousand Best Churches' it's "a superb work of 20th century church art"; Jenkins' book waxes lyrical, and devotes a whole page colour illustration to the east window.

[TWBC: see image in full representation attached].

The overall objective of the Local Plan is "to ensure the quality of life for all residents whether in the home, at school, at work, or at leisure in 2033 is better than today". [TWBC Consultation Statement Sep 2019]

And in section 4.24 the plan notes that 'the cultural offer of an area can benefit wellbeing... the borough has a cultural need'. [Draft Local Plan, section 4.24, p36] How can we calculate well-being? With mental health very much on today's agenda, what recourse do people find in Tudeley?

If the comments are anything to go by, visiting this country church in its quiet location has a transformative effect on many who come. Here are just a few comments from the visitors' book:

'A magical and spiritual place' 'There is so much peace here' 'Beautiful windows in a peaceful setting' 'Meditative and beautiful' 'Silence is golden' 'So tranquil'

How much of this peace will visitors find if there is a housing estate all around the plot?

Meantime, the church provides inspiration for further artistic endeavour. Poetry and music have been generated by its presence and value:

[TWBC: see images in full representation attached].

From Oxford University, one commentator speaks of the experience of sitting in "that still, small church, immersed in the colour and pain and hope of those windows shining through". [www.universitychurch.ox.ac.uk/sermons/chagall-tudeley]

Note the mention of stillness. Surround this gem with houses, and that is what will be lost.

The best way to 'respect the setting of... All Saints' Church' is NOT to build 2,800 houses around it. **iv)**

Transport:

Perhaps the most compelling argument against the Local Plan for Tudeley is in the matter of transport. It has been pointed out that the traffic from the new development would inevitably devolve on Tonbridge and its railway station. As neighbouring MP Tom Tugendhat points out, this station is already the busiest in Kent - and - other than London - one of the busiest in the south-east of England.

[TWBC: see image in full representation attached].

There is little or no prospect of a new railway station to serve the new community. Simply put, the transport links do not exist.

TWBC realise this - but they have a plan: "Technology in transport is moving rapidly, including in relation to autonomous vehicles... scope for new and innovative technology." [Draft Local Plan para 4.61]

Early drafts of the plan recommended autonomous vehicles connecting Paddock Wood, Tudeley and Tonbridge; these futuristic recommendations have been tactfully dropped in the published version. But TWBC has a record for embracing this innovative thinking, though so far only in theory. An imaginative and visionary proposal was put forward as far back as 2016 - though its proponent had been working on it for some four years prior to that.

[TWBC: see image in full representation attached].

'Self-driving cars could be introduced in Tunbridge Wells' [www.kentononline.co.uk/tunbridge-wells/news/kent-town-set-for-30m-92396]

Self-driving Vehicles for Tunbridge Wells. Joint Transportation Board Agenda and minutes, Monday, 15th February, 2016 [https://democracy.tunbridgewells.gov.uk/meetings/documents/s26066/15b%20Self-driving%20Vehicles%20for%20Tunbridge%20Wells%20-%20Appendix%20B%20-%20Background%20Papers.pdf]

As of 2019, this attractive and compelling £30million project still exists only on paper. It seems highly probable that the same fate would befall the Tudeley version. TWBC has a standard response to all insoluble problems: future technology will provide. These tech solutions are as-yet uninvented, and/or impractical. ---

In parenthesis, I don't expect many people in Tunbridge Wells have ever seen a podcar, or even a picture, so here is one. We look forward to seeing them in Tudeley. [www.podcars.com]

Alternatively, the 'Mister' model seems particularly well-suited to rural Kent:

[TWBC: see image in full representation attached].

There may also be scope for a development of this kind - perhaps sited mid-Medway? *

[TWBC: see image in full representation attached].

* After flooding, obviously. **5. Climate change and the environment**

TWBC Objective: 'to tackle climate change' [Draft Local Plan, p32, Vision and Objectives 2, Strategic Objectives #7: "tackle climate change and minimise the impact of development on communities..."]

On 1st May Parliament passed a motion declaring a climate emergency. Just when we need to treasure our green spaces more than ever, it's short-sighted indeed to be considering submerging Green Belt, AONB, and ancient woodland under yet more development.

However environmentally friendly a development may be, its carbon footprint will be huge: every cubic yard of concrete is responsible for emitting around 400 lbs of CO2. [World Business Council for Sustainable Development]

And the more we pave the Medway valley, the more flooding there will be - TWBC's 'mitigations' notwithstanding. The water has to go somewhere.

We now know that climate change is happening far faster than was previously thought [Scientific American August 19, 2019]; the UK Met Office now confirms that after 11,000 years of stable global temperatures, there has been a rapid heating in the last twenty years.

[TWBC: see chart in full representation attached].

The UK has a responsibility be at the forefront of change: as the first to industrialise, it has cumulatively contributed more carbon dioxide emissions than most other countries. [Myles Allen, Professor of Geosystem Science, University of Oxford]

The latest reports came in August 2019; the draft Local Plan does not - and could not - take account of them. In the light of new research this development is clearly far from sustainable. The Tudeley project represents the thinking of the past, when we thought we could just take from the planet and give nothing back. We know better now.

1 Can TWBC deliver?

2 i) A history of failure

It's cruel to mock the afflicted, but it must be admitted that TWBC's history on delivering on its projects is not an encouraging one. The election of councillors from outside the old TWBC clique seems to augur well for the future, but there is a long way to go.

Here is what locals call 'the cinema site'. It faces directly onto TWBC's council offices.

[TWBC: see image in full representation attached].

To the frustration of residents, it has presented this appearance for eighteen (yes - 18!) years.

Residents were incredulous that in eighteen years, TWBC was unable to manage this prime site in such a way that it was anything other than an eyesore. The previous structures were demolished in 2001. According to the local newspaper, diggers were finally spotted just last month. [TWBC: see image in full representation attached].

[www.timeslocalnews.co.uk/tunbridge-wells-news/ work-finally-gets-underway-on-the-derelict- cinema-site]

But note that the plan includes a mix of units, to include retail outlets.

Once upon a time, retail could be depended upon to provide an income from any town development; those days are gone. In Tunbridge Wells' main retail centre, Royal Victoria Place, a third of the shops stand empty. [www.kentlive.news/news/kent-news/ nearly-third-royal-victoria-places-1032472]

There is no plan to convert any retail premises to dwellings. (Why not?) Instead, TWBC plans for yet more unsustainable retail outlets. Yet again, TWBC is living in the past.

Next, it turned out that their flagship project for new council offices and theatre was deeply unpopular with residents. Voters turfed out long-established councillors in favour of a single- issue party, the Tunbridge Wells Alliance. After years of planning and expenditure in excess of £10million, the project - known around the borough as 'The Vanity Project' - was finally quashed on October 8 2019.

[TWBC: see image in full representation attached].

At once, TWBC created more problems with its grandiosely-named and similarly costly Public Realm plan, costing £1.3million and driving Monson Road retailers close to bankruptcy. The works started on July 7 2019 and were supposed to finish on September 1, but had not been completed by October 30.

[www.timeslocalnews.co.uk/tunbridge-wells-news/ ten-sets-of-roadworks-on-same-day-bring-the-town-to-a-standstill]

As late as 1 October, local journalist Mary Harris began a social media campaign to save local shops: "What Monson News has on the shelves is all they can afford now to put on there..."

[TWBC: see image in full representation attached].

The draft local plan has already cost over £574,000 and is on track to be 2 years and 2 months behind schedule. And yet it has been rushed through.

[@twellsense analysis, via Twitter]

TWBC's plan offers 'a vibrant and viable town centre'. [4. 5.9]

The Council has "ambitious plans to improve the offer of the town centre with both public and private sector investment, including the Calverley Square project providing a new modern theatre..."

Vibrant and viable? The Calverley Square project is cancelled. The local retail centre is on its last legs. The council's grandiose plans are bringing retailers to their knees.

Do these experiences encourage us to believe that TWBC is competent to manage the Tudeley project, in partnership with a landowner who gives his job title as 'farmer'?

Or do they indicate another expensive omnishambles?

1 ii) A failure to consult

TWBC's draft Local Plan looks to the future - and it's rosy:

"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..." [Vision and Objectives, 3.2, 1, page 21]

Which 'other settlements' are these, and how will they be connected? The only meaningful one is nearby Tonbridge which has its own housing need. The Tudeley development is located absolutely on TWBC's border with Tonbridge and Malling. It is 1.5 miles from Tonbridge Railway Station, and the best part of 6 miles from Tunbridge Wells Station.

It is clear that all the infrastructure demand will be placed on Tonbridge.

The Local Plan developed for nearby Sevenoaks was recently rejected by inspector Karen Baker for not properly consulting neighbouring authorities, saying:

"My main concern relates to the lack of constructive engagement with neighbouring authorities to resolve the issue of unmet housing need and the absence of strategic cross boundary planning to examine how the identified needs could be accommodated. Indeed, the council did not formally ask neighbouring authorities if they were in a position to address its unmet housing need until just before the Local Plan was submitted for examination.

Any failure of the duty to co-operate cannot be rectified during the examination and therefore the only option is for a report recommending non-adoption to be issued or for the plan to be withdrawn."

So how have nearby TWBC handled their duty to co-operate? The headlines are not encouraging.

[TWBC: see image in full representation attached].

[www.kentonline.co.uk/tonbridge/news/council-blasts-plans-for-thousands-of-new-homes-214496]

Neighbouring Tonbridge and Malling Borough Council knew nothing of the Tudeley plan. When it was revealed in full, T&MBC went so far as to hold a special meeting to discuss it (2 Oct 2019), at which Tonbridge and Malling's mayor said: "I am so angry I can hardly speak".

In his response letter on behalf of T&MBC, Planning Policy Manager Ian Bailey wrote: "TMBC needs to be assured that it will be a key partner". [Response on behalf of Tonbridge and Malling Borough Council (T&MBC) 16.10.2019]

TWBC replied blandly that "The policies specifically state that we will work closely with neighbouring authorities on the infrastructure requirements of the Plan." The inspector may consider this to be a little late in the day, and wonder why it is limited only to infrastructure requirements?

As for residents, the full proposal for Tudeley was only publicly revealed in May 2019: [TWBC: see image in full representation attached].

[Excerpt from letter from Castle Planning of Berkhamsted, Herts, dated 31st July 2019, on behalf of The Save Capel Campaign Group and Capel Parish Council]

Other aspects of the plan were developed years earlier, and indeed, the plan itself was due for publication in January 2019. Was it delayed until May to work up some justification for the so- recently-included plan for Tudeley? Or were the plans kept quiet for as long as possible because TWBC knew they were flawed?

For consistency of approach, the Inspectorate must surely return the plan to TWBC for 'lack of constructive engagement'.

iii) Evidence base impossible in the time

Section 1.30 of the plan states that TWBC has "commissioned and completed a substantial and varied evidence base" [Draft Local Plan, 1.30, p19]

Yet the Tunbridge Wells Green Belt Study, Stage Two, prepared by LUC in July 2017, makes no mention of the Tudeley project - though other parcels are examined in detail. Was Tudeley not included in TWBC's plans at that time?

How can 'a substantial and varied' evidence base have been constructed between publication of the Green Belt Study in July 2017 and the first mention of the scheme in April 2018? Certainly very little time has been allowed to build up "a substantial and varied evidence base". How could such an evidence base be comprehensive without the views of residents? How could those views have been incorporated when the plan became public only in May 2019?

One might conclude that the various arguments in favour of the Tudeley project have been hastily put together to justify, ex post facto, its inclusion in the Draft Local Plan. This view is supported by the failure to consult with neighbouring boroughs: presumably TWBC simply didn't have time to comply with this aspect of the Local Plan system.

1 iv) Non-compliance with NPPF

Does the plan comply with the Local Plan system in other respects? According to the NPPF Consultation Draft p18, it is required to be:

"Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."

- . There has been no objective assessment of the area's housing need
- . Plan was not agreed with neighbouring councils eg Tonbridge and Malling
- . Does not balance needs, so is not consistent with sustainable development*

* The term 'sustainable development' is long defined as "development that looks to balance different, and often competing, needs against an awareness of the environmental, social and economic limitations we face as a society" Sustainable Development Commission, 2011

"Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"

- . Reasonable alternatives (eg brownfield) have not been considered
- . The attraction of dealing with just one-landowner has overridden other concerns
- . No proportionate evidence of alternatives: they have simply been ignored

"Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground"

- . Not based on cross-boundary working with T&MBC - and others?

"Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."

- . Not consistent with recent ministerial pronouncements on Green Belt (See also notes on sustainable development above)

In conclusion, it is clear that TWBC's Strategy for Capel Parish fails on many counts. It has failed to follow proper NPPF procedures in consulting with neighbouring boroughs, with calculating its housing need, or taking account of environmental factors.

It dismisses the causes of the national housing crisis without consideration. It proposes a ghetto for the wealthy. It fails to address its own housing need - 1,000 families waiting for housing.

It proudly boasts its plans for affordable homes, conveniently overlooking the fact that they will be affordable only to those with incomes over £100,000.

It is out of date with respect to environmental challenges. It pays insufficient attention to the risks of flooding, promising unspecified mitigations. Without justification, it places a huge percentage of its planned housing entirely on the one fifth of its area which is designated Green Belt. It fails to focus on the 25% of its area which is NOT Green Belt, AONB or SSSI.

TWBC's plan would utterly ruin its biggest heritage asset - the quiet peace of a country churchyard, and a mecca for visitors from far and near, thereby jeopardising its own tourism income.

It offers futuristic but unspecified solutions to its transport problems, dumping them unannounced on its neighbouring borough, whose railway station is already the busiest in south-east England.

It claims to be concerned about climate change, but offers more unspecified and probably non-existent mitigations. It exaggerates the value of its evidence base, and seeks to divert attention from the rushed manner in which its plan for Tudeley has been developed.

It has a record of proposing unworkable plans, spending millions of pounds of ratepayers' money on them, and having them collapse. Residents opine that it is not competent to manage its own parking policy, let alone a major housebuilding project.

It is, in short, a failure.

TWBC's response to the government's call for 'the right homes in the right places' is to come up with the wrong homes in the wrong places.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_30

Comment

Consultee	Mrs K Bell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	East Peckham Parish Council
Address	[REDACTED] [REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	East Peckham Parish Council [REDACTED]
Comment ID	PSLP_464
Response Date	27/05/21 09:38
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	PSLP_464_East_Peckham_Parish_Council_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	East Peckham Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	Policy STR/SS 3 The Strategy for Tudeley Village
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TWBC Local Plan Pre Submission

Having been discussed during a meeting of East Peckham Parish Council, I write to advise that East Peckham Parish Council reiterates the comments contained within our submission to you in October 2019. Our views have not changed, a copy of that submission is attached.

Question 7

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Graham Edwards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Golden Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Graham Edwards [REDACTED]
Comment ID	PSLP_1012
Response Date	03/06/21 08:20
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graham Edwards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Dear Sir, Madam,

I am a resident of Golden Green and have lived here for 8 years. I have lived in this local area with my wife and 2 children, now grown up, for the last 34 years, so I do know the area well.

I wish to express my opposition to STR/SS3, the proposed new strategy for Tudeley Village. I do not feel that the proposals are sound, appropriate, or reasonable to build so many new houses in this area for a number of reasons.

Firstly, the area that the housing is proposed to be sited, is partially flood plain. This is there for a reason and to cover it with housing and roads and driveways is only to push the flood problem on somewhere else. There does not seem to be a coherent and sensible approach to managing the flood issue. To defer this very important matter to further down the planning cycle is in my view naive and simply assumes that this matter can be dealt with satisfactorily at a later point.

TWBC are opting to create a significant number of houses right on the boundary of their area, nicely out of the way of their own larger towns, reap the benefits of the council tax and "dump" the infrastructure problems, such as schools, doctors surgery etc, onto Tonbridge and Malling. This seems cheeky at best ! In reality, it is a very poor decision to create a mess and walk away, such that it doesn't affect TWBC, other than reap the financial rewards. It seems that the proposal to go with a couple of very large housing developments, that satisfy TWBCs housing requirements, that does not include brown field sites as the preferred option, is to simply take the easiest route for Tunbridge wells planning and council.

The addition of so many houses will significantly increase the local traffic. The main arterial roads local to me, such as the A26 and the B2017 into Tonbridge, especially at rush hour are already at walking pace. This creates significant pollution, impacts the environment and increases costs to businesses and time to everyone impacted. The A26 from Hadlow to Tonbridge frequently tails back to Three Elm Lane already. With the proposed closure of Hartlake Road, this will be even worse. The proposed closure of this road seems to make no sense at all. This route is used frequently, especially by locals to get quicker and more efficient access to the A21 to head south or north. Without this, we will be forced to have to work our way through Tonbridge, which increases time and fuel costs and adds to even more congestion. The alternative routes for me to access Tunbridge Wells or anywhere South will either mean going west to pick up the A26 and work my way through the centre of Tonbridge or out east via East Peckham and then south using the A228, which is a much longer route. Both of these increase pollution, exacerbate already busy roads and increase time and costs.

The proposed development at Tudeley will bring with it 1,000s more cars as typically most families have a car, frequently 2 per household. TWBCs proposals to negate this with an additional railway station on the main line has been opposed by the railway authorities, as the busy east-west main line to Ashford / Folkstone already has 2 stations relatively close to each other, Tonbridge, and Paddock

Wood. An additional station in between would have a significant impact on timetables. When questioned at a public meeting, which I attended at Somerhill school, at the Regulation 18 stage, about the additional congestion from the extra vehicles that such a large number of houses would bring to an already overloaded infrastructure, their response was that they would promote cycling. This is simply ridiculous along even the main roads which are narrow, with no footpath and hilly.

I am astounded that TWBC do not want the increased population that this proposal will bring to be sited much closer or within their main town of Tunbridge Wells. This would create much greater opportunities for both using brown field sites and enhancing a local bus / public transport network.

Tunbridge wells response to the wide and significant objections to Regulation 18, seem to have been largely ignored, perhaps assuming that if they just keep ploughing on, it will all be accepted. This could not be further from the truth.

I do not believe that the impact of the proposed significant increase in housing has been fully considered and the detrimental affect on the neighbouring town – Tonbridge and out-lying villages such as Golden Green.

Representation from Local Councils, Members of Parliament and many, many residents, all opposed to the current plans have been seemingly ignored by TWBC. I urge you to reject the plans and significantly reduce the number of proposed housing for Tudeley.

Best regards

Graham Edwards

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alison Edwards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Alison Edwards [REDACTED]
Comment ID	PSLP_1158
Response Date	03/06/21 21:22
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Alison Edwards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Golden Green for the last 8 years and have lived in the local area for 35 years. I am a local Practice Nurse, working in a local GP surgery, as well as more recently delivering the COVID vaccination programme. This means that I have to frequently travel in all directions across the surrounding area.

I have brought up my 2 children, who attended local schools and we have all attended church and clubs locally for the last 35 years.

In this time, the traffic congestion has definitely increased and the ability to park has also become more difficult. Local GP practices are very busy and getting an appointment takes much longer than it used to and is now frequently several days. As a Practice Nurse in a GP practice myself, I can see that the whole service is under mounting pressure and will soon be overwhelmed.

The main issues with the STR/SS 3 plans and proposals are the significant impact it will have on the local area. The proposed new housing will eliminate 800 acres of greenbelt. This is an area where I love to walk regularly to keep healthy for my mental well-being. Covid restrictions and the lockdowns have taught us to value our countryside more and how important it is to each and everyone of us. As the population grows, it is more important than ever that people have space to roam the countryside locally without having to use their cars. They also need good quality locally produced food which needs agricultural land. The plan if adopted would destroy 100s of acres of agricultural land. We need more of this land not less to support our ever- growing population and for the country to be more self-sufficient, especially in light of Brexit.

The proposed development is also in a high flood risk area (Tudeley) and flood plain (East Capel) which seems madness when the river Medway now floods regularly during the winter months. This water desperately needs somewhere to go. The proposed covering of land will reduce the flood plain capacity and increase the flooding depth by concentrating it into a smaller area. This is then likely to significantly impact other villages further downstream.

At the moment (2021), approximately 2,500 people live in Capel. The proposed development will increase the population to around 13,500. The majority of families will have at least one car and frequently two or more, leading to a significant rise in air pollution and a dramatic affect on the local traffic, especially at rush hour. It seems such a disproportionate increase to add so many dwellings (500% rise), destroying a rural parish, right next to Tonbridge. Tunbridge Wells borough council will receive all the council tax for this, but Tonbridge will have to suffer the increased traffic, car parking, demand on GP Surgeries and schools. There will also be a significant and long-lasting impact of disruption and hassle to the local residents of all surrounding villages during the building phase of this huge number of houses.

I believe that there has been inadequate pursuit of using alternative sites, such as Castle Hill, Blantyre and brown field sites within the TWBC area, especially more local to Tunbridge wells town.

I strongly oppose this plan.

Alison Edwards

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I believe that further consideration could and should be made to the Castle Hill site as an alternative.

In addition, the number of houses should be significantly reduced

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anja Ennis [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anja Ennis [REDACTED]
Comment ID	PSLP_1064
Response Date	03/06/21 12:21
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Anja Ennis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Paddock Wood for 40 years. It used to be a lovely town. The fields and countryside were stunning and it felt very rural; now the entire town is a mass of concrete. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy. As there is no local market, the houses are being marketed in Hong Kong as Buy To Let. As the town expands the flooding will only get worse as trees, hedges and drainage ditches are removed or concreted over. Traffic is terrible, particularly during rush hours and school drop-off/collection times. Tudeley is a small village; it doesn't have the infrastructure to be able to take on anything like this size of over-development. It will ruin the current village. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Duncan Ennis [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Duncan Ennis [REDACTED]
Comment ID	PSLP_1079
Response Date	03/06/21 13:20
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mr Duncan Ennis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived with my wife in Paddock Wood for 7 years and I grew up in Matfield. It used to be a lovely town. The fields and countryside locally were very rural and green; now the entire town is a mass of concrete with more developments beginning every day. We do not need to double the size of the town with expensive houses, which locals cannot afford and would not buy anyway as they are, or will be, built on a flood plain, which is against National Policy. As the town expands the current flooding will only get worse as trees, hedges and drainage ditches are removed or replaced by housing estates. Traffic is terrible, particularly during peak hours and school drop-off/collection times. Tudeley is a small village; it doesn't have the schools, shops, doctors or road infrastructure to be able to take on anything like this size of over-development. It will ruin the current village. It is not necessary to build on Green Belt Land and productive farmland. With Brexit it will be more important for us to be able to grow our own food, not just locally but on a national level.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr & Mrs Kevin & Lesley Entacott [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr & Mrs Kevin & Lesley Entacott [REDACTED]
Comment ID	PSLP_946
Response Date	02/06/21 12:00
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Kevin & Lesley Entacott
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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To whom it may concern,

Myself and my wife moved with our young family to Capel in 1995. A quiet home in the countryside with farms, AONB and greenbelt land all around us.

We have lived in Redwood Park in the hamlet of Capel for 26 years. As the years have gone by the local lanes have become much busier but it has not spoilt the much needed hedgerows, wild life or the friendly village community surrounding us in Capel and Five Oak Green.

Our local area may be expected to accommodate building new homes as should everybody, but it should always be PROPORTIONATE to the local need. This proposed plan does not reflect the needs of the area and tramples over the wishes of the local population.

As sensible and concerned citizens we recognise there is a demand for housing in this country. However we do not accept the fact that it is necessary or correct to be building at the expense of green belt land, AONB and on flood risk areas.

The TWBC are claiming they have exhausted and fully investigated ALL brownfield sites but have yet to substantiate this.

This current plan is massively disproportionate to this areas need for extra housing and has been pushed through to this stage in spite of incredible opposition. This proposed Tudeley Housing Estate (beautifully named Tudeley Garden Village) along with the East Capel proposed development, is a convenient way of TWBC fulfilling an extremely high proportion of their allocation of unsubstantiated housing needs. Unfortunately this shows a total disregard for the residents of the surrounding areas. Tudeley itself, Five Oak Green, Capel, East Peckham, Paddock Wood and Tonbridge to name a few. The area of this Tudeley Housing Estate is green belt land, flood risk and AONB land. The infrastructure of the surrounding areas will not be able to cope with the population growth requiring, GP surgeries schools and roads.

Boris Johnson stated in the House of Commons that there would be no building on green belt land unless in exceptional circumstances. These exceptional circumstances in our opinion appear to be the Teachers Estate are willing to release these acres of beautiful countryside to TWBC which is the easiest and most convenient answer to the housing quota. Dealing with only one very accommodating landowner.

A few years ago TWBC turned down an application made by the Poacher public house in Hartlake Road Tudeley. They applied to build a small bed and breakfast business to compliment their current building. The planning office stated it would spoil the surrounding green belt area and would create

more of a problem in regard to flood risk. The reasons given are just some of the very reasons our community are stating now. To build thousands of unwanted homes in this area will increase the flood problems further down the line and TWBC should be held accountable over this proposed decimation of our countryside of which can never be replaced.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anne Etherington Rich [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anne Etherington Rich [REDACTED]
Comment ID	PSLP_56
Response Date	23/04/21 10:21
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	

Respondent's Name and/or Organisation	Mrs Anne Etherington Rich
Question 3	

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3: The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Tudeley is a settlement that has existed for hundreds of years and is recorded in the Domesday Book. Now TWBC want to destroy it. Your chosen method of destruction is to turn this settlement into a "Garden Village" which sounds very pleasant but in reality means dumping a housing estate of 2,800+ houses on land that is at present both farmland and Greenbelt land, swamping and overwhelming the current residents of this small settlement.

I read in my copy of Autumn 2019 Local that TWBC want to make a positive contribution to combating climate change and I am confused. Surely we should be treasuring and protecting our farmland, so that we can grow the crops we need rather than importing them from abroad, thereby lessening our carbon footprint.

The same applies to our Green Belt land. Green Belts are the lungs of this country and as such should be strongly protected. Tudeley is wholly within the Green Belt and to my mind forcing 2800+ homes on the current settlement is akin to planting a cancer seed in those lungs.

I begin to wonder if the lunatics have taken over the asylum.

The bulk of the land slopes down from the B2017 to Tudeley Hale and is dissected by the railway line. It is served by two narrow country roads, one, Sherenden Road is more a lane than road and goes under the railway via a small, height restricted bridge. The other, Hartlake Road, is slightly wider and goes from Tudeley to Golden Green. At the Tudeley end is a sign saying it is not suitable for HGV's and it crosses the railway via a narrow bridge. Hartlake Road has become a "rat run" at the start & end of most weekdays as people drive to work or schools. Outside of commuting times it is quieter with large tractors & farm vehicles going about their business, however, when there are road works or an accident in Tonbridge, drivers use the road to get from the north of Tonbridge to the south.

Hartlake Road crosses the flood plain, so at times of flood it is impassable and is closed.

These are the only two roads that serve both parts of the proposed building site, so it is hard to imagine how construction traffic will access the land north of the rail line, unless of course it comes into Hartlake Road via Golden Green. I wonder, do the residents of Golden Green realise their lives could be disrupted by this traffic for years?

The same applies with utilities. As far as I am aware gas & sewage pipes were only installed along the B2017 part of Tudeley, they certainly didn't extend to Tudeley Hale as it was deemed too expensive and not cost effective at the time. So these will need to be installed. Over or under the railway? Whichever option is favoured, it will mean road closure and disruption to the lives of the current residents, who will also have to endure several years of living near or by a building site.

As previously mentioned, the proposed building site land slopes down from the B2017 to Tudeley Hale. Beyond Tudeley Hale is the floodplain. Throughout the lower part of Tudeley Hale there is a network of drainage ditches that keep the farmland drained. At times of prolonged rain or flood these ditches become inundated with water and can overflow. Both my front & back gardens have been

flooded several times over the years, and the fields beside and behind my house have become waterlogged too. The prospect of flooding is a worry, particularly as we are told sea levels are likely to rise in coming years. Having a housing estate built on a sloping site that leads down to your locality adds to that worry. There will be run off from all that hard standing & tarmac, will it ALL be gathered and contained, or will some escape and find its way into the drainage ditches, increasing the risk of flood?

The pollution is a real worry too. 2,800 houses mean at least 2,800 extra vehicles on the roads around Tudeley, probably double that as most households have more than one car these days. Then there is the extra traffic from the other proposed sites in Capel. Our air quality is going to seriously diminish!

I know your plan is that everyone will use public transport, cycle or walk, but you don't live here. Take it from one that has relied on public transport for 40+ years, bus timetables are not respecters of appointments, be they with doctor, dentist, hospital or hairdresser. I have wasted many hours of my life getting an earlier bus than I want to because I have an appointment to keep.

As for cycling along the B2017, at present you would be foolhardy to attempt this at peak traffic times. My husband, also a non driver, cycles to and from work in Hildenborough every day, he starts work very early so thankfully he misses the peak traffic, but he gets wet when it rains, and freezes in the winter. Not many people, particularly commuters, would do this willingly.

People who have cars will use them, if you think otherwise you are seriously deluded.

Light pollution is also a concern. Away from the Crockhurst Street part of Tudeley there are no street lights or pavements. Here in Tudeley Hale, it is dark at night and you can see the stars. The lights from a housing estate on a sloping site would stick out like a sore thumb and would be seen for miles.

Likewise with noise pollution. Away from the B2017 Tudeley is a quiet peaceful, place. Tudeley Hale is in a valley and any sound tends to ricochet around the valley. 2,800 dwellings on what is at present farmland are likely to produce extra noise. Indeed, the building of those dwellings is likely to make the whole area noisier for years to come.

Your draft plan for Tudeley mentions often the provision of green spaces for leisure activities. Please don't bother, we already have them. It's called countryside. Here in Tudeley we have a good network of public footpaths that are well used. In Tudeley Hale at weekends and quiet times there are people rambling, leisure cycling, riding horses or making their way to Hartlake Bridge to do some fishing. Some people just walk towards the river so they can stop and look around at the scenery. Being in a valley means you get a beautiful view of fields, woodland and hedgerows that all slope up to the distant hills. We may not be within the AONB, but we should be! It's not just locals that do all these activities, a good percentage of the people come from Tonbridge or other surrounding areas to enjoy open space away from buildings and town life. Often they end their walk or bike ride at the local pub where they will sit in the garden with a cool drink & something to eat all the while looking at the view. If your plan goes ahead they will be looking at a housing estate, I suspect that they will not return.

The Covid Pandemic has highlighted just how valuable this green, open countryside is, as the numbers of walkers, cyclists & now runners, has increased enormously as people have sought somewhere that isn't too far from home to take their daily exercise. Sadly, they have not been able to visit the pub because it has been closed due to lockdown, but at least they have been able to enjoy the space, scenery and fresh air, which has been even fresher due to less traffic during the pandemic!

Your plan will create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows).

Most importantly is the wildlife. Our wildlife population in the area is wide and diverse. The land you want to build your housing estate on is not only greenbelt, not only farmland but is also home to the wildlife. What are all the birds and creatures supposed to do when you start building, removing hedgerows, cutting down trees, destroying their habitat? Pack their suitcases and move on? Where to?

The plan preparation process didn't include Tudeley (sites CA1 and CA2) until after the Issues and Options Process in 2017. This means that the largest housing area in the plan didn't go through most

of the plan preparation process. The Issues and Options process led to most people (60%) wanting a growth corridor led approach. Less than half wanted a garden settlement and that was when they didn't know the garden settlement would involve destruction of Green Belt. Protecting Green Belt was a key priority for people who participated in the Issues and Options consultation. I think that the plan should be re-written to implement a growth corridor led approach and to protect Green Belt land within the borough.

Earlier in the plan (in 4.40) you refer to Tudeley Village securing a long term option for the borough to deliver the needs of future generations. It is clear from this statement that you intend to add more and more housing to this "garden settlement" in each five year review of future Local Plans.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Finally; Though I live in Tudeley, my postal address is Tonbridge, my landline dialling code is Tonbridge, my doctor is in Tonbridge, I am a member of Tonbridge library, I do my shopping in Tonbridge and yet I pay my council tax to you, TWBC. If your plan should go ahead I suspect any new residents would do exactly the same, which to my mind doesn't seem very fair on Tonbridge, they provide the amenities and you get the money.

Therefore I strongly object to your plans for Tudeley.& Capel.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Maggie Fenton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Maggie Fenton [REDACTED]
Comment ID	PSLP_1935
Response Date	04/06/21 13:51
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Maggie Fenton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR/SS 1, STR/SS 3 and STR/CA 1 – see Comment Numbers PSLP_1934, PSLP_1935 and PSLP_1937]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The PSLP as it stands is likely to contravene Protocol 1, Article 1 of the Human Rights Act (The Protection of Property) and therefore is not legally compliant. Everyone has the right to peaceful enjoyment of their property. A Planning authority can only breach this fundamental right if it is in the public interest. Furthermore since the case of Britton vs SoS the courts concluded that the protection of the countryside falls within the interest of Article 8 (Respect for private and family life) and includes BOTH home and surroundings. There has to be a fair balance between the general interest and the rights of individual property owners and businesses. It may be necessary with some planning applications to compulsory purchase or to allow a certain amount of traffic noise to intrude a personal home but there has to be a fair balance. There must be objective and reasonable justification. The LA should try to ensure that policies and decisions do not interfere with the peaceful enjoyment of possessions. Human rights are clearly defined in law and Planning Authorities are obliged to treat everyone with dignity, respect and fairness. Proportionality is the key test.

There is nothing proportionate regarding TWBC allocating over 50% of its development on a parish which contains only 2% of the population of the borough. The rights of property owners and the rights of the community have to be balanced. There is NO benefit to this area, in these plans, for the existing community. The views of the community have been ignored from start to finish.

- . The whole of Capel will suffer from 15-20 years of severe disruption if this plan proceeds. That alone is likely to deter local businesses.
- . Capel will be significantly impacted by thousands of cars, traffic noise and pollution and the clear danger to public safety in a parish that already has severe speeding issues.
- . Capel will lose its precious countryside
- . The community has already suffered from severe stress and anxiety during the last two years with the threat of CPO's, and for some the impact of being suddenly being in the centre of a new town, for others loss of identity as they are threatened with being moved into an entirely different parish.

The community throughout Capel is strong and united. Five Oak Green might not be the exemplar of a quaint arcadian village but it is a close, tight and friendly community, which is more important than beautiful houses set in a sterile environment. People make places not houses. We are not Nimby's in Capel and are very aware of the need for truly affordable houses for our younger generation, suitable housing for our elderly and a share of development to bring economic prosperity.

BUT we shouldn't be the easy target for TWBC because we have a small population and they thought we wouldn't shout long and hard! Sadly they have ignored the shouting and objections at Reg. 18 and

rewarded us with another few hundred houses. Tudeley in particular was the easy option and deflected TWBC from its original course of a more equitable distribution of development amongst the rural villages. Capel has not been treated with dignity and respect throughout this whole process and a huge majority of the community will not be able to peacefully enjoy their properties nor the countryside surrounding them.

Due to the lack of objectivity, lack of proportionality, and lack of any community benefit the PSLP is unjustified, not positively prepared and therefore unsound.

Question 6

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TWBC need to objectively reassess all sites in the borough, work on their brown field register which is pitiful and find a more proportionate solution to the housing need.

Question 7

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Question 7a

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Because this has consumed my life for the last three years!

Future Notifications

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Comment

Consultee	Mr Jeff Fenton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Jeff Fenton [REDACTED]
Comment ID	PSLP_882
Response Date	01/06/21 13:16
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Jeff Fenton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Numbers: 5.218 and 5.219

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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5.218 New railway station – TWBC has rejected sites within their “call for sites” as they were “too close to the railway line”. Tudeley Garden Village has the main London/Ashford/Dover railway running through the centre of the site. How can this be approved when there are hourly diesel goods trains and the Dungeness Nuclear Waste train (once per week) along this line. The plan to build TGV is Unsound.

5.219 How will TWBC test this detail? How can they measure this? It is waffle. Unsound.

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5.218 As we cannot remove the railway then we must remove Tudeley Garden Village from the Plan.

5.219 As the whole issue of measuring damage elsewhere is unmeasurable then this cannot be modified. It is a nonsense statement.

Question 7

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As lead for Capel Road Safety Campaign and Co-ordinator for Kent Police Community Speedwatch, I have a good and realistic knowledge of highways in the area and the many issues that the PSLP has highlighted or missed. It is important that proper debate takes place.

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Event Name	Pre-Submission Local Plan
Comment by	Mr Jeff Fenton [REDACTED]
Comment ID	PSLP_884
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Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Number: 5.222

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

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Besides the issues regarding water dispersal into the Medway Valley; there are major issues regarding habitat management. You cannot tell birds and wild animals to move home whilst you destroy their habitats and then move them back into a land which will be an unfit habitat with cats, dogs, children, noisy vehicles, street lighting and traffic.

The whole of the Tudeley area is a special area for wildlife, particularly as it is bordering AONB and within the beautiful Medway valley. To concrete over this landscape is obscene, unjustified as there are other options elsewhere, and will cause long term damage to the local wildlife environment.

The plan is Unsound.

Question 6

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Build at Castle Hill instead. TWBC claims about it being AONB and protected seem to have been totally ignored when they released AONB land bordering Castle Hill for the Kingstanding Business Park in March 2021.

Question 7

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Question 7a

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Event Name	Pre-Submission Local Plan
Comment by	Mr Jeff Fenton [REDACTED]
Comment ID	PSLP_924
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Submission Type	Email
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Respondent's Name and/or Organisation	Jeff Fenton
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Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is sound	No

Question 4a

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Do you consider that the Local Plan is not sound because:

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- . It is not effective
- . It is not justified
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Question 5

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Page 7. 1.7 TWBC has commissioned LUC to provide independent advice on the impact on the purposes of the Green Belt. Over the last 3 green belt studies produced by LUC it is apparent the brief was to gradually find ways to make it possible to remove greenbelt status from the strategic sites. Original policies by TWBC confirmed in their view it was vital to protect small towns and villages from urban sprawl – LUC have now in GB Study 3 concluded that the NPPF only refers to large towns and as this area is not next to Tunbridge Wells the MGB criteria is dispensable. This does not smack of independence. It appears too that DLA were also commissioned to make “the hat fit” Their brief was ‘to ensure that the infrastructure requirements for PW and East Capel reflect, and influence the work undertaken on the PW and and E.Capel Structure Report and Plan”.

Page 20. “This should include the provision of an offline A228 strategic link”.

This has not been considered important enough for 40 years. To build it on the back of some 6,000 new dwellings means it will be obsolete before it’s even completed.

Page 24

4.19- 4.230 Refers to the Church Farm estate being developed at present in PW by Countryside. Mascalls Farm (now called Foal Hurst Green) by Berkeley Homes and Mascalls Court Farm by Persimmon. Mascalls Farm has now had a planning application approved for an additional 100 dwellings - a 35% uplift. (It is likely the other developers will follow suit) If this is applied to Capel and Paddock Wood, the new developments will stretch from PW to Tonbridge engulfing Five Oak Green in one urban area. The total would be nearly 9,000, nearly 100% of the whole of TWBC requirement during the plan period. (It must not be forgotten that Hadlow Estates were happy

to extra land in the AONB to the south of Tudeley New Town for another 1200 houses). Once the erosion of the MGB is started there will be no stopping.

Page 30 4.39 The FOG By-Pass is totally dependant upon Tudeley being built.

Page 31. 4.41 The AONB to the S. of Alders Road can be ignored and the by pass driven through ancient orchard BUT the AONB at Castle Hill, a much preferred site by Capel Parish Council and many others, cant be built on because it is AONB (scruffy AONB as well!) This AONB has also suffered from the dualling of the A21 and TWBC were unanimous in agreeing that the adjacent site be approved for their key economic area.

Page 31 4.42 It seems the planners have no comprehension of Colts Hill. Most accidents occur at the junction of Alders Road and Crittenden Road. The original design for the Colts Hill by pass proposed a flyover from Alders to Crittenden, now the plan is to join the new link road into the main by pass by a cutting running into the AONB. It appears Stantec have pulled together a very rough and misleading design. A roundabout outside a school at the other end?? Pollution? Parent parking (yes they'll drive!)?? Very ill thought out.

Page 31. 4.42 A lack of understanding about the word “Capel” which TWBC have been informed about many times throughout the LP process. With the exception of the eastern end of the B2017 (where 220m is in PW) the whole of the rest of the B2017 westwards is within Capel. The Woodgate Way roundabout (junction with the A26) is in Capel.

Page 32. 4.45 East Capel may have been moved by TWBC planners, but East Capel starts from the East of Five Oak Green. The A228 is not the boundary of E. Capel.

Page 35 4.50 *The route connecting PW – Tudeley- Tonbridge is very hostile to bicycles.* Quite, and yet Stantec and SWECO talking a massive reduction in car use.

Page 40 4.74 This is an understatement. In FOG there is a single 250mm fibre pipe that pumps all effluent (around 500 homes and businesses) at pressure 3m underground to PW treatment plant, the pipe is old and has exceeded its lifetime Expectancy (source: Southern water) It is in need of replacement and works in the area are likely to cause significant disruption to any construction in E. Capel. The pipe has burst at least 9 times causing sinkholes, pollution above and underground & within the drainage ditch system that feed the Medway.

Page 44. Companies may have changed their operating methods but there is no evidence that the “built environment” is being reshaped due to the pandemic especially as this observation was made before the second lockdown.

Page 61 4.139

Mineral extraction in Capel. This has been very lightly touched on yet it fails to recognise the significant impact of extracting 10m tons of gravel per annum for 20yrs. The dust during the extraction process and then the huge 7 ton dumper trucks carrying the materials 600m across a site to the sorting area will impact many properties in Capel. HGV movements on the A228 are estimated to be around 80-120 vehicles a day – to date I have found no reference in the masterplan or PSLP that shows safe access points across the A228 with this sort of traffic considered.

Page 62 Given the strategic sites are in both in flood prone areas, surrounded by flood plain areas, in the MGB, adjacent to AONB served by rural lanes in the main this is probably one of the least sustainable areas in the borough and most constrained unlike the NE corner. Although the A228 has some capacity, the Dampiers corner roundabout is the busiest junction in the borough (SWECO) and is also a designated IA (Important area) DEFRA for noise pollution as is the Whetsted part.

Page 63 Cross boundary solutions? Where is the evidence that this is likely to happen? Why would neighbouring boroughs share infrastructure and flood alleviation schemes. KCC is the flood and highways lead and to date there has not been an accurate study of the flood issues throughout Capel. Sound solutions to the Colts Hill by pass have not been found for 47 years and there is no evidence to support this PSLP that funding has been sourced.

Page 68 Map. Where did DLA obtain their maps. It is Capel not Chaple Grange. They were informed of their misuse of names at their presentations but neither they nor TWBC have corrected. The map shows a pedestrian route crossing the A228. There is no crossing. There is a 100m section to walk along the A228 to reach the next PROW. It is unsafe, with 60mph vehicles and will be more so with the quarry traffic and the thousands more cars these developments might bring.

Page 71 TWBC and Hadlow Estates realising the secondary school was unsustainable being next to Tonbridge (companits from TMBC) the developers at PW (too far for their students to travel and therefore their sites become unsustainable), it is place near the primary school. To then decide to put a major junction (by pass roundabout) anywhere near theses schools is dangerous, and totally unacceptable.

Page 73 Development should not be allowed to interrupt or dominate views across the landscape is a good sentiment but does not accord with siting thousands of homes on the edge of the AONB, on a slope at Tudeley and on the other side of Capel where the view from the AONB will be altered forever.

Page 79 Misleading maps that show bridleways as cycling and pedestrian routes. The language used suggests they exist already. They do not and they will need changing by statute as cycling is prohibited on bridleways.

Page 88 5.45 States that raised platforms will be needed of approx 1m around 11ha of the development in E Capel to ensure floodwaters remain outside the residential area. This would require 10,000,000 cubic metres of soil. Even at the cheaper price of £20 per ton, the cost would be in the region of £22m

before construction costs. The result of course would be to drive water elsewhere and flood other areas – as stated in other documents down to the Medway (and thence to E. Peckham & Yalding)

Page 107 6.7 The 2015 Infra. and Highways model is being ignored. As TWBC have changed their policy regarding use of MGB land there can be no assurance that anything within their LP will be built.

Page 108 6.13 If the Colts Hill by pass is essential to the LP, why is this separated out in the infrastructure plans as just the northern portion of the improvement on the A228? It states in 6.14 that KCC has the scheme costed at £46m yet this is not within their Highways budget for the current period to 2025. At the earliest it would not be completed until 2030 and possibly later if they did decide to build. 6.14 There are major drainage issues on Colts Hill and a new road is likely to increase the already unacceptable flooding in Five Oak Green.

Page 109 The entire page demonstrates that TWC and KCC have ignored the necessary improvements to Colts Hill for so long that they now face a major issue with timing and delivery of any solution. The impact on all the roads in the area of building a by pass later than 2023-25 is that they will have to build the whole project off- line and even then there will be capacity issues on the A228/B2017. They must look towards a new road that joins the A228 to the A21 at the Hop Farm and runs through the Medway Valley. The original bypass is outdated by 40+ years. This could have a junction near Hadlow and significantly reduce traffic levels, accidents and costs elsewhere. This would be a sensible and progressive solution. This road could also accommodate the Quarry HGVs for the planned extraction period of 20 years

Page 110 6.22 Agree with the statement “contributes largely to making the proposals unviable.

Page 120 Big error! This shows the hamlet of Capel NOT the main road running through Five Oak Green! The text compounds the error by saying it's the B2160 through Five Oak Green when in fact it's the main Maidstone road in Paddock Wood. Appalling

Page 121 Fig 24 Speed limits are wrong and highlights that this has been a rushed desk-top study. The inclusion of a major roundabout outside a primary school is utterly ludicrous.

Page 122 6.39

This is unsound. In pW of the 3 new developments currently approved and being built, a whole new drainage system has had to be installed, post development, to meet demand that was not considered necessary when the applications were approved. Should the same approach be adopted in E Capel then the house will be flooding before the estate completed.

Page 124. Table 9 *Construction (Colts Hill by pass) is likely to take place as the site is being built out.* This is not a sustainable option – a bicycle travelling on Colts Hill at present brings the whole area to gridlock – with construction of the dwellings at the same time as road closures, it is likely there will be severe economic impacts – companies will take their business away from the area. Colts Hill is also the main route for ambulance traffic between Maidstone and Pembury and they leave and return to the make ready depot in Paddock Wood.

Page 124 Table 9 Providing high quality active travel & public transport connections EARLY is not possible if the roads haven't been built to accommodate the buses! There is therefore unlikely to be any modal shift in travel habits.

Page 125 6.53 This masterplan excludes Tudeley village. There is no “helicopter” perspective without including Tudeley in one comprehensive masterplan of the strategic sites. TWBC is likely to lose control over many aspects of the masterplanning if this plan is taken forward. The several individual developers at PW will not adhere to this masterplan nor will Hadlow Estates calling in to question deliverability.

Page 126 6.56 6.57 These two statements are evidence that TWBC intends to approve any/all site expansions in the area above those already approved, so they can support the new critical infrastructure elsewhere through S106 agreements. If developers do not wish to build more than current, the whole infrastructure plan is likely to fail through lack of funds. TWBC is trying to underwrite the funding of infrastructure development that they can not guarantee they will receive. What is the mechanism to force developers to roll out the build in phases that suit critical infrastructure construction? “Land banking” is a major issue throughout the UK and again how will TWBC enforce the roll out of developments?

Page 130 Table 10, Long. Phase 3 is beyond 2032. It is clear there will be no highways improvement schemes adopted at least beyond 2032. How does this tally with the fact that this infrastructure is

either essential or critical. Independent highways consultants have concluded that it must be commenced prior to any build out of developments and for example the B2017 would be unable to manage the construction vehicles without vast “improvement”

Page 130 Table 11. Confirmation that the whole of Capel (and Paddock Wood) will be disrupted with construction works of dwellings and roads for many years. It has to be assumed that it will be some time after 2040 before the A228 and Five Oak Green by passes are completed. Confirmed by the HoP at a meeting of “15 – 20 years of disruption” and “Colts Hill is “likely to take considerable time to build”

Page 134 “Traffic management in PW” Medium. We assume that Medium means that Five Oak Green, so desperate for traffic calming measures already, will see no investment in highways until at least 2032. We will not be holding our breath as we will be too busy attending to people knocked down in the village!

Page 139 6.78 “Safety improvements at Colts Hill have been retained as the A228 is a key route for Paddock Wood traffic to access the wider strategic road network.” This is inaccurate. They have retained half a by pass and not the area where there are multiple RTCs (Crittenden/Alders junction). The A228 is a key route for some HGV drivers but most they can legally drive on the B2017 to reach the the A21 and Tonbridge (and vice versa) as it is 2.4 miles shorter in distance, does not involve Colts Hill where many delays can occur and the other many delays on the A264 accessing the A21 at Pembury where long queues format the traffic lights and 2 roundabouts before they join the A21. The by pass needs a re think anyway – it is a road to nowhere as TWBC & KCC Highways have found it impossible to find a solution to this bottleneck at Pembury.

Page 140 Table 14. Infrastructure not commencing until 2025 -2032?

Question 6

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The masterplan is unsound, it is not justified. It has not been based on proportionate evidence. It is littered with inaccuracies, which if translated into further evidence bases means this plan is undeliverable. A reassessment of a more proportionate allocation of sites is called for. It is clear that deliverability of key infrastructure will not be “I before E” (expansion) – an assurance from our MP Greg Clark. To pretend that both strategic sites will follow garden village principles falls at the first hurdle – those successfully rolled out such as Poundbury are all situated on A roads. An isolated new village would be possible if in the wilds of Scotland perhaps but NOT in Kent which has the highest car ownership in the UK, suffers from high levels of HGV traffic from the continent and is already gridlocked at peak times.

Question 7

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As previously stated

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Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Policies Map (Inset Map No(s)) 33 and 34

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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The main challenge for highway design is to provide a safe, efficient, future proofed and effective solution. The highways plan being promoted by David Lock Associates fails to do this and is Unsound. Map 33 illustrates the main errors that the new Five Oak Green bypass terminates outside of two schools and does not offer relief to rat running on Alders Road/Crittenden Road as the proposed bypass route will be longer and slower due to the number of junctions being introduced.

There is no recognition of the B2160 south beyond Paddock Wood which is the most direct route to the dualled A21 at Kippings Cross through Matfield. As the junction of B2017 & B2160 in Paddock Wood will become clogged with traffic (due to the railway bridge being closed to through traffic in Paddock Wood), many drivers will use the Matfield route to A21 via the back roads of Paddock Wood to avoid the B2017/B2160 junction.

The whole roads layout does not reflect the traffic levels that will be seen throughout the area.

The plan is therefore Unsound.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I am not paid to find the solutions that TWBC contracted consultants are supposed to offer as workable and effective solutions. I do of course offer my services at £1,250 per day (plus expenses) if TWBC wishes to recruit me, subject to the usual Ts & Cs.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As lead for Capel Road Safety Campaign and Co-ordinator for Kent Police Community Speedwatch, I have a good and realistic knowledge of highways in the area and the many issues that the PSLP has highlighted or missed. It is important that proper debate takes place.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Katharine Findlay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Katharine Findlay [REDACTED]
Comment ID	PSLP_1920
Response Date	04/06/21 10:29
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Katharine Findlay
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

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I have lived here in Capel for 18 years. We came down from London to live in a quiet village atmosphere surrounded by beautiful countryside. We worked here for 7 years and now are enjoying our retirement surrounded by farmland and enjoying friends in the area.

We have noticed a build up of traffic here, which alarms us. Flooding has happened quite a few times in Five Oak Green. The proposed development is overwhelmingly inappropriate for our rural location. Including the Paddock Wood and East Capel (Policy STR/SS1)

Environment

This area is green belt land, which is so important to keep. This is an area of outstanding natural beauty. The level of housing proposed would destroy the area and take away our enjoyment of the green spaces, walking, watching nature and peacefulness.

Transport/ Road

As public transport is poor, our roads are totally inadequate for more traffic. The proposed road - "Five Oak Green bypass" will mean the village is divided , and some villagers will be unable to walk to the only shop and will also be a barrier to community life.

Question 6

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The plan for such a large town on green belt land in such a delicately balanced rural environment seems a rushed proposal to please the governments targets and not local needs.

Have brown sites been considered or other land with good infrastructure in place already.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicholas Fisher [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Nicholas Fisher (1235108)
Comment ID	PSLP_1943
Response Date	04/06/21 12:06
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.7
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Nicholas Fisher
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived at The Old Vicarage with my family since 1998 and remain appalled at the continuing proposals for Tudeley Village and TWBC's apparent disregard in the PSLP to the widely and strongly held opposition to the unsound possibility of "Tudeley Village". This response relates to site allocation.

Section 8 of the Sustainability Analysis (Potential Development Sites) shows that Plot 440 is classed a reasonable alternative site within Table 49 and Figure 12 but is not covered at all within Appendix H so is excluded for no reason and no analysis or reasoning for that has been put forward by TWBC.

I am the joint owner of The Old Vicarage and its land, all of which forms Plot 440. There is no logical or coherent reason why this 3.5 acre/1.41 hectare site should not have been allocated for development in the PSLP. It is large enough to provide a yield of over 10 dwellings and possibly in excess of 30 (see the SHELAA referred to in the strategic assessment undertaken by TWBC). It has good access on two sides (east and north) of the plot direct onto the B2017 and new entry/exit road entrances could be made onto this site. For the plot to be not allocated appears to be in breach of TWBC methodologies, possibly because of TWBC's reliance on the draft Tudeley garden settlement proposal. It is also unclear why there is an insistence on 10 units per site; it might be preferable to spread small pockets of planned development of less than 10 units within existing settlements throughout the Borough, even within Capel Parish. Plot 440 is also well suited to such a smaller scale development as well.

Whether or not the proposal for the garden settlement at Tudeley (site SS3 in Sustainability Appraisal section 8 Figure 12) is accepted in whole or part, the current draft transport infrastructure proposal suggests that a large roundabout will be constructed at the junction of Hartlake Road and Tudeley Road/Crockhurst Street (B2017) which is likely to require some land to be taken from plot 440 (being land currently forming part of the Old Vicarage curtilage). It appears also to suggest widening of the B2017 between Tonbridge and two proposed junctions on the western and southern sides of the draft Tudeley garden settlement (see map 33 Transport Connections following s.5.229 of the PSLP). This proposed widening includes the entire section of the B2017 adjoining Plot 440 and is likely to require some land to be taken from it. No consultation about these proposals has taken place with the owners of plot 440.

Plot 440 falls on the perimeter of the AONB represented by the B2017. It adjoins the B2017 and is already impacted by traffic on the north and east boundaries of the plot that back onto the B2017. The views to open farmland and woods would be retained on the other two sides of the plot (west and south). The PSLP provides for a strategy to use AONB land spread across a number of settlements.

Whether or not the draft garden settlement at Tudeley is approved, housing could be provided on plot 440; it is inappropriate and unsound to permit or consider an initial development on site SS3 of up to

2,100 houses in the period to 2038 with potentially more to follow and to not permit development on plot 440. Part of that site SS3 is immediately opposite plot 440 and the planned road infrastructure in relation to that is going to impact negatively on plot 440.

If the garden settlement were refused, then plot 440 is still viable for development. The current transport infrastructure assists without additional cost as the plot is adjacent to the bus stop in Crockhurst Street opposite All Saints Church and opposite the bus stop at the Hartlake Road intersection. The plot boundary is next to the B2017 (see above). As is well known Tudeley is well placed for access to Tonbridge and the rail network, based on current road use. A permissive pathway exists that is accessed from the southern boundary of the plot and this leads to various footpaths and bridleways forming part of the High Weald network.

This site comprising plot 440 does not suffer from flooding and is within the existing urban settlement of Tudeley. It is not owned by the Hadlow Estate, although it adjoins Hadlow Estate land on all boundaries apart from the B2017 boundary.

It is noted that the proposed LBD has not been settled but why is the whole of the existing urban areas of Tudeley not incorporated? Plot 440 is within the land referred to as Option 3 in growth options for Tudeley in the Sustainability Analysis of February 2021 (see section 6.2.32 Figure 6 and Table 28). It is noted most of that option refers to land to the south and east of the current settlement and not the part of the existing hamlet where plot 440 is located. The rejection of growth option 3 appears unsound as in relative terms it scored as highly or better in some aspects than growth options 1 and 2. It is perverse that a draft proposal for a new settlement that radically changes an existing urban settlement excludes the whole of existing settlement as an area for limited building plots. As owners of plot 440 we are stakeholders in future infrastructure planning, assuming the draft garden settlement is approved in whole or part and should take part in discussions leading to future supplementary planning documents.

NOTE:

This response relates to the “not allocated” plot 440 of which I am joint owner (see above). I object to the unsound concept of the draft Tudeley garden settlement (a proposed town not a village within what PSLP describes as a small hamlet) and have made separate comments in relation to that. For the avoidance of doubt, the comments in this section/response are not to be taken or read as being supportive of the draft Tudeley garden settlement proposal; quite the opposite in fact.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been a resident of Tudeley since 1998. The draft proposals for site SS3 directly impact my property. In addition to that I consider that due process has not been followed in relation to my own property as per my comments in section 5 above.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

See section 5 above

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicholas Fisher [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Nicholas Fisher [REDACTED]
Comment ID	PSLP_1948
Response Date	04/06/21 12:06
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Nicholas Fisher
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived at The Old Vicarage with my family since 1998 and remain appalled at the continuing proposals for Tudeley Village and TWBC's apparent disregard in the PSLP to the widely and strongly held opposition to the unsound possibility of "Tudeley Village".

The creation of a proposed garden village settlement at Tudeley resulting in the first instance in 2,100 dwellings in the period to 2038, will cause immense harm to the residents of the Parish of Capel and to the residents of Tonbridge. It is completely out of scale with the current pattern of habitation in Capel Parish and particularly so in the case of Tudeley itself where no new houses appear to have been built or permitted to be built since I moved here with my family in 1998. In its own words TWBC describes Tudeley as a "small hamlet".

The methodology and justifications used to promote a garden settlement on Site SS3 appear flawed. There is a reliance on site SS3 as one of 2 major developments to provide over 50% of the proposed housing for the period to 2038. Both this site and site SS1 are in Capel Parish with only 2% of the TWBC population. Capel Parish has 918 dwellings and the plans for sites SS1 and SS3 would increase this number by approximately 500%. Over half of those are planned for site SS3.

The PSLP and Local Plan are almost entirely dependent on the successful implementation of the proposed garden settlement in Tudeley and the expansion of Paddock Wood by building on East Capel. I believe the planned units comprise over 60% of the new housing requirement. If these sites fail to deliver, which is possible bearing in mind realistic timeframes for planning and so on, then the associated proposed infrastructure that is entirely reliant on developer capital would also never be realised. This appears to stack risk on risk, where both areas of development in Capel Parish are inextricably linked and the failure of one is likely to lead to the collapse of the other and as a result the whole plan would fail. This does not appear a sound basis on which TWBC should rely.

The plan preparation process suggested by the PSLP did not include the Tudeley site SS3 until after the Issues and Options Process in 2017. This means that the largest housing area in the proposed local plan did not go through most of the plan preparation process. A great deal remains unclear.

The Issues and Options process led to most people (60%) wanting a growth corridor led approach. Less than half wanted a garden settlement and that was at a time when it was not clear a garden settlement would involve destruction of Green Belt. Protecting Green Belt was a key priority for people who participated in the Issues and Options consultation. TWBC's own Green Belt study shows harm caused by the release of Green Belt as high.

Another purpose of Green Belt is to prevent urban sprawl but the PSLP shows site SS3 as creating a settlement that in effect stretches to the edge of the planned STR/SS1 at Paddock Wood thereby creating a small conurbation.

It is unclear from the methodology if the conclusions reached in the spatial strategy are justified. Frittenden and Horsmonden that both share similar characteristics to site SS3, as does the Blantyre site at Goudhurst, which is partially brownfield, have all been discarded.

Other significant potential sites for development, for example in the A21 corridor and also at Castle Hill have been rejected. Is it correct that the proposed settlement at Tudeley is the only reasonable place for an entirely new settlement? It appears insufficient attention has been paid to the brownfield sites available within the Borough.

Most people living in the proposed Tudeley settlement will drive cars, despite initiatives to encourage bus and bicycle use. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. The cost to Tonbridge based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, and not Tunbridge Wells or Paddock Wood, because Tonbridge is closer and more convenient.

It is foreseeable that people living in the proposed Tudeley settlement will use Tonbridge Station, rather than Paddock Wood, and Tonbridge town services will need more parking. The increase in traffic will be more than Tonbridge can cope with. The main roads in Tonbridge are already full at peak times and can't be made wider in most places.

The employment proposed within the Tudeley settlement is unlikely to be able support the income requirements of approximately 2000 individuals/families (using the unit numbers as a guide) and so it is inevitable that residents will be working elsewhere generating more road usage.

The road infrastructure is already inadequate to deal with the flow of current traffic. There will be a significant increase in traffic into Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every morning and to a lesser extent in the early evening. The infrastructure proposals for the whole site are not certain and appear to be reliant on potential developer contributions. The necessary infrastructure for a viable settlement goes far wider than just roads. It is unclear how necessary infrastructure can be delivered and so the proposal for SS3 may not be viable.

There will be an increase in air, light and noise pollution that will spread across the boundary to Tonbridge & Malling and create a visual scar across the landscape.

Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saints Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, commercial premises, bus lanes and sit next to a planned expanded B2017 with new roundabouts and junctions. That will cause great harm to its value as a heritage asset of world renown, due to the crowning jewel of its Marc Chagall windows that are unique to place and setting and represent the only installation of its type in the world. It is one of the most popular Churches in Kent by reference to visitor numbers. Planning new sight lines and other mitigation will never override the potential damage.

The draft garden settlement at Tudeley can never be conceived as one settlement as it is divided by a railway line that has two very narrow, weak crossings (one on a bridge, one under a bridge). Putting in larger crossings at two more points as per the draft infrastructure plan may be possible but it won't tie the two halves of the settlement together enough to make it one settlement. It appears that garden settlement principles may have not been followed in terms of local engagement and support. The overwhelmingly negative responses to the Tudeley garden settlement proposals in the Regulation 18 consultation are evidence of that.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Remove the draft plans and associated draft infrastructure plans for SS3 "(Tudeley Village)" from the PSLP and Local Plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been resident in Tudeley since 1998. The draft proposals for site SS3 including in particular the draft road infrastructure proposals impact my property which is opposite part of the site.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

See section 5

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Megan Forster [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Megan Forster [REDACTED]
Comment ID	PSLP_881
Response Date	02/06/21 10:31
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	

Respondent's Name and/or Organisation	Margaret Forster
---------------------------------------	------------------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS 3

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived and worked in Five Oak Green for almost twenty years and am constantly aware of the flood risk and have suffered flooding to my property. This occurs when there is excessive rainfall - storm water combines with foul water to create a hydraulic overload to the sewerage system and ground water comes up to meet it. I would not wish this situation on anybody.

To build 4000+ houses on a flood plain puts them at risk and potentially exacerbates the flood risk for Tonbridge, putting even more pressure on the Leigh barrier and puts a cumulative effect on the drainage infrastructure.

Foul drainage is tackled far too late in the planning process. Southern Water does not cope with the sewerage infrastructure as it is. Areas of Paddock Wood and Five Oak Green get sewerage overflows every time it rains heavily.

Even with flood retention schemes installed, who will stop residents from paving over gardens and driveways in the future adding to an increased run-off. Should the Environment Agency be forced into attempting even more solutions that could have been avoided ?

I worry that, with the increasing number of flood events across the country, insurance companies will not be interested in insuring houses built on flood plains, the Flood Re. scheme being not available to houses built after 2009. I worry for my own ability to insure my property when the flood risk is increased all around me.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_37

Comment

Consultee	Mrs Farah Brooks-Johnson [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Mrs Farah Brooks-Johnson [REDACTED]
Comment ID	PSLP_557
Response Date	28/05/21 11:18
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Connect FoT Final.pdf GSP Friends of Tudeley Final.pdf (3) Landscape FoT Final.pdf

Question 1

Respondent's Name and/or Organisation	Friends of Tudeley
---------------------------------------	--------------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3 The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
----------------------	----

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Friends of Tudeley has been advised by three expert consultants: Connect (Transport Consultants); Neil Williamson (Landscape Consultant and former President of the Landscape Institute); and Graham Simpkin Planning. Their reports are attached. They all consider this policy (STR/SS3 "The Strategy for Tudeley Village") to be unsound.

A brief summary of the main points developed is as follows.

Transport and Infrastructure (Connect)

The site cannot offer sustainable transport. There is no rail station and never will be. TWBC's evidence refers to a "4 buses an hour" bus service and has assumed that it would capture a 7.4% market share, but that has been assessed by a specialist public transport consultancy and shown to be a wholly unrealistic market share (and the service to be financially unviable).

Because of the lack of other options the new settlement will inevitably pour thousands of cars onto local roads, especially at peak hours. The local infrastructure will be swamped, even with road widening and physical junction changes. TWBC's own consultants have accepted that even the programme of road improvements put forward will not be enough to prevent overload.

Perhaps the most striking aspect of Connect's report is that on analysing the TWBC traffic evidence, Connect have discovered that for the roads to function around this new settlement TWBC are entirely reliant on a drop in car usage of about 62%. Without that drop, TWBC's consultants accept that the local road network will be overwhelmed. It is extraordinary for TWBC's plans to be based on a 62% drop in car usage. It is contrary to decades of UK travel behavior trends, even in places with excellent public transport (which Tudeley Village will never have). The TWBC modelling is unrealistic and obviously unachievable, rendering the Plan unsound.

Without sustainable transport, the site is not sustainable. Residents will travel outside the development to shop, to take children to school (as a certainty for most of the plan period, and very likely thereafter), to receive medical care and to go to work. The primary school is not included in the first phases of development and the secondary school will not be built until the very end of the development phasing (beyond the Local Plan period) leading residents to seek access to places at schools that are already over capacity. Even once the new schools are built many residents will choose other schools (particularly given the number of established high quality schools in Tonbridge, including grammar schools) and will travel outside the settlement anyway. The settlement is too small to attract a major supermarket and so food shopping on site will be very limited. Shopping deliveries will add yet further traffic. The

costings and timelines outlined in the Infrastructure Delivery Plan are fragmented and unconvincing, with many items essential for the settlement's operation marked only as 'desirable'.

Landscape (Neil Williamson)

The development of the proposed Tudeley Village allocation site would result in harm to the landscape, harm to the High Weald AONB and its setting and harm to the Green Belt. None of these harms have been adequately assessed by TWBC.

The susceptibility and sensitivity of the landscape of the Tudeley site are both to be classified as "Very High", yet neither have been adequately assessed by TWBC. Although TWBC has published assessments of the landscape sensitivity of other potential allocation sites in the area east of Tonbridge, it has not undertaken any such analysis of the Tudeley site. The locally exceptional landscape value of the Tudeley site has not been recognized by TWBC.

The extent of visibility of the site from the surrounding area including the AONB has not been adequately considered by TWBC. It will be considerable, given the wide, open nature of the local landscape. There are no Zone of Theoretical Visibility (ZTV) maps. No Landscape and Visual Impact Assessment (LVIA) has been undertaken by TWBC or made available by other parties for democratic scrutiny. Representations by the promoter underestimate the extent of visibility.

The absence of a rigorous landscape assessment of the Tudeley site is a very serious omission, given the scale of the proposed development and the sensitive location of the site within the Green Belt and immediately adjoining the High Weald AONB. Neighbouring planning authorities have undertaken full LVIAs for proposed strategic housing allocation sites even where the numbers of homes are smaller and, in some cases, the locations are less sensitive.

The Tudeley site currently enjoys a high level of tranquility, comparable to that of the adjoining parts of the AONB. The landscape and ecological impacts of light pollution and loss of tranquility have not been adequately assessed by TWBC. The tranquility of the site and the surrounding area including the adjacent parts of the AONB would be seriously and adversely affected by the proposed development. The AONB, its setting and the rural character of the B2017 road that forms its boundary would be harmed.

TWBC's published documents acknowledge that there would be harm to the setting of the AONB, but underestimate its extent and severity [see section 4]. TWBC's most recent Green Belt Study (2020) underestimates the harm to Green Belt Purpose 2 and greatly exaggerates the potential for mitigation and compensatory measures. The overall level of harm to the Green Belt would be Very High.

It is premature to consider the allocation of the Tudeley site for development until detailed studies have been undertaken of the landscape and visual effects, together with the effects on heritage and ecology that relate to both the development itself and the associated transportation infrastructure. This is required to provide sufficient evidence for the balance of planning harms and benefits to be adequately determined.

The Sustainability Appraisal of the Local Plan is flawed because it is based on inadequate environmental information in respect of the potential environmental effects of the Tudeley site allocation. No detailed analysis has been made publicly available of the landscape sensitivity or impact, or of the heritage or ecological assets and impacts.

There is no evidence that landscape implications have been adequately considered in the current development proposal or that the key garden settlement principle of enhancing the natural environment will be met.

The published masterplan for Tudeley Village conflicts with the recommendations of the Council's AONB Setting study (in that it proposes housing hard up against the B2017 road that forms the AONB boundary). The AONB Setting study recommended minimising development within the southern parts of the site and setting it back from the AONB boundary.

The proposed new settlement as illustrated in the published masterplan and proposed in Policy STR/SS 3 would be incompatible with proposed policies for the environment, including Policy STR 8 (Conserving and enhancing the natural, built and historic environment); Policy EN 1 (Sustainable design); Policy EN 8 (Outdoor lighting and dark skies); Policy EN 18 (Rural landscape); and Policy EN 19 (The High Weald AONB).

Policy STR/SS 3 would result in harm to the High Weald AONB and would be contrary to AONB Management Plan objectives R1 and R2 (impact on the B2017, a historic routeway) and objective OQ4 (impact on tranquility).

The new settlement as proposed would conflict with the Tunbridge Wells Borough Landscape Character Assessment (adopted SPD) in that it does not comply with landscape strategy for Character Area 13 [see paragraph 9.6].

The requirement in the Kent Design Guide (adopted SPD) that 'a rigorous investigation of the site will be required for all development' has clearly not been met for the Tudeley site. Since this is a requirement for all development sites within the Borough, there can be no justification for failing to apply the requirement to a proposal for a new settlement of 2,800 homes.

Taking all of the above into account, the Local Plan fails the test of soundness in respect of Policy STR/SS 3 for Tudeley Village, because:

- . appropriate and proportionate evidence on landscape and other environmental implications has not been provided; and
- . it does not accord with the NPPF, in that it fails to protect valued landscapes as required by paragraph 170 and would result in inappropriate development that would be harmful to the Green Belt, contrary to paragraphs 143 and 144.

Planning (Graham Simpkin Planning)

Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) requires that local planning authorities (and other prescribed bodies and persons) must co-operate in relation to planning of sustainable development. The duty is to engage constructively, actively and on an on-going basis in the preparation of a Local Plan as it relates to strategic matters. **A new settlement such as the proposed Tudeley Village is exactly the sort of strategic planning issue on which co-operation is mandatory.** TWBC needs to demonstrate clear evidence of collaboration from the earliest stages of plan preparation but has failed to do so; there is **no evidence of genuine cooperation with neighbouring local authorities on strategic matters.**

The reasoning for selecting the proposed Tudeley Village site is inadequate and TWBC have not given sufficient reasoning why the Local Plan is the most sustainable strategy when considered against the reasonable alternatives. The likely environmental, social and economic effects of the Local Plan are not adequately nor accurately assessed in the SA.

The failings of the largest strategic sites (which are fundamental to the overarching strategy of the Local Plan) to contribute adequately to the Government's 'nearly zero' 2030 targets means that the plan does not secure development and use of land which will contribute to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004.

The spatial strategy is not justified or sustainable. Other reasonable options have not been assessed in detail and exceptional circumstances for development in the Green Belt have not been demonstrated. The evidence base is not proportionate and important gaps relating to nationally important site features means that sites such as the proposed Tudeley Village may not be deliverable.

TWBC has not identified the most appropriate strategy to meet the identified housing need. The value of growth option 7 forming part of the preferred development option, perhaps with a large urban extension, was dismissed without adequate assessment. It could contribute to housing needs in a manner that is sensitive to the settlements at which it is located. The proposed strategy which includes a new settlement is not justified, nor consistent with achieving sustainable development.

TWBC's over-reliance on strategic sites and lack of flexibility renders the plan not positively prepared, ineffective and in conflict with the NPPF. In addition to an urban extension, TWBC should incorporate more small and medium sites in the plan (instead of a new garden settlement), which are much less likely to be at risk of unexpected delay. More 'previously developed' sites (including unused agricultural buildings in suitable locations at the edge of settlements) should be identified, as could settlement edge development described in growth options 7 and 8. **It seems vanishingly unlikely that a garden village could deliver 150 homes per year by 2025 / 2026 and it is essential the plan includes development opportunities that can genuinely be delivered quickly.**

There is insufficient information to be able to assess matters related to heritage, air quality, landscape and protected species, for example, despite adverse impacts being inevitable and serious.

All in all, the plan has numerous deficiencies in respect of soundness and legal compliance. These deficiencies go to the heart of the strategy and the plan cannot be made sound by modifications. In any case, the failure to comply with the Duty to Co-operate would mean that the plan should not be adopted in its current form.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove STR/SS3 The Strategy for Tudeley Village and all references to the proposed Tudeley Village from this Local Plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Friends of Tudeley is an unincorporated association of local residents concerned about the soundness of TWBC's proposal to create a new settlement at Tudeley. We will make an important local contribution to the matters under discussion

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The likely environmental, social and economic effects of the Local Plan are not adequately nor accurately assessed in the Sustainability Appraisal.

The reasoning for selecting the proposed Tudeley Village site is inadequate and TWBC have not given sufficient reasoning why the Local Plan is the most sustainable strategy when considered against the reasonable alternatives.

A detailed description of the flaws in TWBC's Sustainability Appraisal is in Section 3.0 of the attached report by Graham Simpkin Planning.

If you would like to attach a file in support of your comments, please upload it here. [GSP Friends of Tudeley Final.pdf \(3\)](#)

If you would like to attach a file in support of your comments, please upload it here. [Connect FoT Final.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [Landscape FoT Final.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nick Gandon ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] Tudeley TN11 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Nick Gandon ([REDACTED])
Comment ID	PSLP_1955
Response Date	04/06/21 13:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Nick Gandon
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Dear Sir/Madam,

My family and I live at Church Farm Oast, next door to Tudeley Church. We have three children. Unsurprisingly, we have been actively against the "Tudeley New Village" plan, since day one. I list our concerns as follows:

Infrastructure/Roads – the B2017 is already crawling with traffic in both directions from Tonbridge to Paddock Wood, every morning of the week. Most of this traffic is heading in to Tonbridge, especially to the station. This road cannot possibly take more traffic during the rush hour, it will grind to a halt. In Five Oak Green, the traffic already travels dangerously fast past the school and through the village – there have been several near misses and minor incidents, this needs calming measures installed to ensure pedestrians, especially young children, are protected.

Schools – there is already a shortage of secondary school places in the area and more housing will only impact that shortage further.

Pollution – Increased traffic will of course add to the pollution in the area where many young children and wildlife live. This will of course have a negative impact if the plan were to go ahead. I know there is talk of cycle paths etc., but the reality is that the majority of new residents will have a number of cars that will likely be used daily. Of course this transcends to noise pollution, both in the form of vehicles, but also residents. Additional people will result in additional noise in the area, again effecting the wildlife and general feel of the area. A big concern of mine is that where we currently have quiet fields, if the plan went ahead, we may have loud party's taking place late in to the night in new residence and/or in the communal areas that are planned to be within a few meters of our boundary. Further to noise pollution there would also be light pollution – the beautiful clear skies that we are currently blessed with in the area, will not be as visible any longer and the views of our historic church, would be ruined.

Wildlife and Biodiversity – in the past year, in the field between the church and the railway line, we've seen Deer, Foxes, Geese, Rabbits, Foxes, Newts, Bats, Slow Worms, Red Kites, Buzzards and other birds of prey. Building on this land will permanently destroy the habitat for this wildlife. The farmland here is productive and of huge benefit to the UK's self subsistence along with all it does to aid biodiversity in the area.

MGB/AONB – The proposed plan is to build on MGB, surrounded by AONB (which will be hugely impacted as result of this plan). The idea of MGB is to separate towns and stop urban sprawl, but this plan will effectively bring Tonbridge and Paddock Wood together as one.

Brownfield and town center regeneration– There are huge amounts of Brownfield sites within the borough, that have not yet been considered for development. My understanding is that in order to build on MGB, the potential of all Brownfield sites, must be exhausted first. This has not happened.

Flooding – Areas of Tudeley and the surrounding villages, already have huge flooding issues. Additional building, in the areas planned, will only add to these problems. A lot of research on this has been done by Save Capel, so I won't repeat it here, but it is a huge concern of mine.

Water Supply/Sewerage – The issues at Paddock Wood around sewerage are well known and of great concern. How can we be sure that this issue will not be intensified with the new Plan.

Engagement – There has been very little engagement with the community and this plan process. With the exception of the Charette, which felt very much like a box ticking exercise, we have had no real engagement from the Hadlow Estate or TWBC. It is obvious to everyone that the TWBC feel they have found a very simple solution to their problem of needing to build more houses and they have been extremely lazy in moving this forwards. They have not looked at Brownfield, they have not engaged the public, they have not offered up solutions to the issues of infrastructure, flooding, destruction of MGB and they have refused to take the community's views in to consideration. They appear to have failed us, their constituents, on several grounds. There are quite a number of properties on the market in Paddock Wood and Tonbridge, suggesting that this area is not necessarily the most needy in terms of new houses – why is it that Capel is set to take nearly 50% of the borough's housing demands?

Whilst we appreciate houses are needed and the borough needs to accept it's fair share of the building requirements, it seems ridiculous that such a large number of the quota is intended to be dumped in such a small area and on MGB. We are positioned in an area of beautiful countryside, with well used footpaths, ancient woodlands and historic buildings of great interest and cultural value. There is not a demand within Capel for this volume of housing, we've carried out our own assessments and these are vastly lower than the proposed plan. A plan of this scale, would be a Ghost Town, an utter failure and at the expense of wildlife, biodiversity and the current Parish residents.

What is of greatest, personal, concern to my family and I, is the potential of new "communal space" coming right up to our boundary line, which is only a few meters from our house and my children's bedrooms. This boundary line joins the North facing boundary of the church, fencing in the graveyard. This should be a quiet space for remembering loved ones and contemplation, but if it is to border "communal space", there will be noise and potential raucous behavior, which is incredibly unfair on those paying their respects. To us, it will of course mean that we have increased security risk and noise levels at our property, in addition to losing the current views and wildlife of the area. This is all linked primarily to Phase 3 of the build, the area stretching from the church to the railway line.

Question 6

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To make the plan legally compliant, the views of the community must be taken in to account. Brownfield sites and town center regeneration need to be reviewed and developed, before considering to build on MGB. Proper flood risk assessments need to be carried out. An understanding of where in the borough, housing is actually needed, would need to be sought. The sheer volume of housing being proposed for this area, is ridiculous and unnecessary, no proper thought has been given to transport links, schools, shops, leisure facilities, etc. Living where we have for the past 8 years, we know how overcrowded the roads already are and what flood issues we see every Winter and the struggle for school spaces, none of this has been properly considered within the plan. Proper wildlife and biodiversity

studies need to be carried out so that the impact of any development can be mapped out and balanced. TWBC needs to look at and consider the infrastructure requirements in terms of schools and roads, especially the knock on effect to surrounding areas, especially Tonbridge.

In summary, we can understand the need for around 400 houses being built over the next 10 years, for which the infrastructure will grow organically and without detriment to biodiversity of the area nor the community already living here.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Linda Garcia ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Linda Garcia ([REDACTED])
Comment ID	PSLP_1369
Response Date	04/06/21 16:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Linda Garcia
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My family have been residents in Hartlake Road, Golden Green for nearly 33 years. We have raised two children here, commuted to work via train into London and over this timeframe have seen several negative changes to the surrounding countryside and Tonbridge itself. Within our immediate environment we have experienced more flooding over the years including problems with sewage and a decrease of natural habitats for our local wildlife. Traffic has increased hugely and local infrastructure isn't coping well. With the implementation of the proposed local plan, these problems will worsen considerably. Arranging medical appointments will become much more difficult also. I am particularly concerned that arable land will be sold off for housing when this should be used as was intended to feed the people. Pollution will increase and the loss of habitat for our birds, animals and small invertebrates is unforgivable particularly as we are encouraged wherever we look to take care of our environment. As for affordable housing, will this be affordable housing for young, local people? I doubt it! Why are brownfield sites with the borough not being considered? I find it grossly unfair that TWBC will pocket the council taxes raised while our local town (Tonbridge) and TMBC villages will suffer the impact of the proposed plan.

Question 7

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- . No, I do not wish to participate in examination hearing session(s)

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- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mark Ginsberg [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mark Ginsberg [REDACTED]
Comment ID	PSLP_1062
Response Date	03/06/21 12:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.8
Question 1	
Respondent's Name and/or Organisation	Mark Ginsberg
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I live at xxxx, Sherenden Road, Tudeley TN11 xxx [TWBC full postal address redacted for data protection] and have lived at this location for 25 years bringing up both my children here. I chose this location with my late wife due to the rural aspect having moved from an urban area. I feel fortunate to have this opportunity of a lovely place to live where we can all enjoy the vast benefits that this rural environment brings, the positive health benefits and tranquil and free open green spaces. I work in Tonbridge and able to regularly enjoy the incredible asset that I live amongst and that I, and visitors to the area, appreciate every day. We chose to live here because of the rural location and all that that offers.

GREENBELT

The proposed site sat within the Metropolitan Greenbelt. The purpose of the Greenbelt is to prevent urban sprawl and protect the countryside and the threat posed to wildlife and landscape. According to the NPPF, there are five stated purposes of including land within the green belt, these are to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and finally to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The NPPF states, developing on Greenbelt should only be in 'exceptional circumstances' and must be justified and evidenced and not to just alleviate demands for further housing.

It is not clear what the exceptional circumstances are at these sites of Tudeley and East Capel? A single landowner does not constitute exceptional circumstances and should not be considered in an intelligent and well thought out planning policy. These areas of Greenbelt have the above purposes and must be protected. In an area that is already considerably built up and congested part of the South East corner of the UK, the priority must be to save these precious green, rural landscapes for future generations. There are many alternatives, more suitable and sustainable sites throughout the Borough for building new homes which are available, for example the high number of Brownfield sites throughout Tunbridge Wells Borough. The site at Blantyre House and the government land around it. The extent of land in the north east of the Borough which is non designated land.

Save Capel campaign group undertook a survey of potential brownfield sites and have identified a number of locations that are not registered as such with the Borough and are prime sites for development.

Although the proposed development is being promoted as a garden village, the volume of 2800 homes does not make it a village other than on a planner's desktop. It will inevitably end up as a traditional housing type of development which is entirely unacceptable in this rural Greenbelt location, breaching every aspect of the need for Greenbelt. The Local Plan and the developer refer to this part of the plan as being modelled on Duchy sites such as Poundbury. This kind of 'sell' and idealism is wrong and

incorrect. Poundbury as a location is directly bolted on to the existing town of Dorchester and in its construction, it has the benefits of the transport links or rail and Strategic Road Network (SRN) encompassed within it. This proposed plan provides no rail nor immediate road and is not bolted on to a town within the borough but to that of a neighbouring borough, Tonbridge

INFRASTRUCTURE

The proximity of the site to the town of Tonbridge and the neighbouring Borough of the same name constitute considerable urban sprawl, especially when taken with the proposed new school site and the other planned sites in the Parish. Tonbridge will extend as urban to Paddock Wood. The choices made now must be prudent for our future. The areas of non-designated land must be prioritised ahead of any green belt development.

The area of this site is rich in its biodiversity. Tudeley is mentioned in the Domesday Book and there are records that show the land, which was even then noted for its richness for agriculture, was given as a gift from William the Conqueror to his half brother. 1000 years later the land is still agricultural and is a combination of grade 2 and grade 3 agricultural land. Grade 2 and 3 are very good and good respectively. The Planning office for TWBC are on record as referring to the agricultural land as poor during meetings held with Borough Councillors when voting on taking this option forward towards the plan. This was clear misinformation and untrue, to hear a planning office make such obvious untruths about the land raises serious concerns as to whether an abuse of process has taken place.

The building of a new town on this scale would destroy this rural environment where the biodiversity is rich and diverse, ancient trees and woodland remain, meadows, hedgerows and good quality agricultural land exists alongside each other with a small rural community built sympathetically within this rural setting. If the new town was built on the Tudeley site, the rural environment and landscape would be destroyed and lost forever, over 600 acres of very good/good agricultural land would go. It could never be replaced.

Due to the fact that Tudeley is a rural area and sustainable in that format there is no infrastructure in place to support a huge development of the proposed scale. The proposed site is NOT sustainable in that it is poorly served by public transport and residents will have no option but to drive to work. The current road infrastructure for the intended site is served only by narrow country lanes and there is inadequate capacity to accommodate the proposed housing development, the idea to close some roads would cause isolation to other rural areas such as Golden Green and the north side of East Peckham villages.

The roads are already at capacity from Tudeley into the neighbouring town of Tonbridge especially during peak rush hour times. The proposal to build new roads has yet to be produced in any planned format and these new roads would take up more Greenbelt. Any new Road would lead traffic to Tonbridge. Tonbridge itself is at road capacity. A new Road May bring the traffic in but would cause a bottleneck at Tonbridge, increase the problems within that town and impact on local, air quality, business costs and quality of life. For Tunbridge Wells to be prepared to inflict this type of devastation on a town of a neighbouring Borough displays a scant regard for cross Borough working as required in NPPF and for the communities that will suffer. Tunbridge Wells will pocket the council tax and Tonbridge and Malling will suffer the burden and demand.

The hugely detrimental impact on the neighbouring town of Tonbridge and its residents has already been recognised by its Borough Council who are strongly objecting over its soundness as a plan. Tonbridge & Nalling are still preparing their plan and will look to add housing in the area and plan around that, they should not have a neighbouring Borough's plans restrict their own provision to their own residents. Many of the residents within that town are also strongly objecting to the proposals. Residents of Tudeley being so close, use Tonbridge as their nearest town for most services including health, transport, retail and leisure services. an increase in population in the area would not only impact on the volume of traffic on the roads but would increase the number of commuters attempting to use Tonbridge railway station. Parking around the station is at capacity as are the commuter trains to London. With the other planned developments at sites already with suitable infrastructure such as Paddock Wood, Marden, Staplehurst and Ashford further along the line, trains may be at capacity prior to arrival at Tonbridge which is a rail hub. In addition to pressure on amenities such as health services, emergency services and schools.

The concern is that the development both in Tudeley and East Capel would result in the urbanisation of the entire area from Paddock Wood to Tonbridge destroying the Greenbelt and rural landscape permanently.

There is no railway station within close proximity of the proposed site. Network Rail have confirmed that there will not be a new railway station at Tudeley as it is too close to Tonbridge and Paddock Wood Stations for the 12 coach trains to alter their speed and to build a new station comes with huge cost implications. Despite this, within the plan, there is still a mention of a possible Rail Station in the future. Again, this is idealism and dreams. When the land was first offered it would seem that the idea of a rail station at the location would make it a near perfect location, without the station, it would be an urban carbuncle.

As mentioned previously, the proposed garden village development is split into two by the railway line and this goes against the principles for a garden village of one settlement and a fluid community. There are only two current crossings of this railway line, Hartlake Road bridge (Red Cow Bridge) which passes over the railway line. Hartlake Road is a wide single track road that allows vehicles travelling in opposite directions to pass; however, the bridge crossing is narrower and only allows two narrow vehicles to pass with extreme caution. The only other crossing is the road passing under the railway line at Sherenden Road. This road is a single track lane with the restricted height bridge being of the same width. The railway line is a main line used for both passenger and freight from the rest of Kent and Kent Ports and to impede this with any new crossing, which would be required would have extreme cost implications which would need to be recovered by developers and so would impact on final costs.

FLOODING

Much of the proposed development is on or near the floodplain. There have been limited flood risk assessments on the site and from living in the area, it is a known problem that the agricultural land floods. This problem will be exacerbated if 2800 homes are built on the Tudeley site and will impact not only on the immediate area but towns downstream of the River Medway, East Peckham and Yalding specifically. All these villages have their own flood issues that they are currently battling. The soil is Kent Clay and despite having a large number of irrigation culverts around most fields standing water remains moderate rainfall. Along the existing railway embankment within the planned development area there are storm type drains, where these drains exist the soil is wet for most of the year and during the winter months has several inches of standing water. Where the embankment lies by the main buildings of the current solar farm there is a permanent swamp due to the failure of the land to adequately drain. This combined with the changing climate and rising sea levels add significantly to the risk.

The proposed plan lies alongside an existing proposal to create an extensive quarry site increasing the current Stonecastle Quarries. The creation of the quarries on existing floodplain and adjacent to the River Medway May have a significant impact on the risk to flooding, the water table lying just below the surface. This fact may cause a significant risk to any adjacent housing development and will create a considerable challenge to develop a suitable sewerage facility which will be required to treat the waste for any development. In any case, the placing of a necessary sewage facility will be difficult and costly and represents a risk to the Medway River.

HOUSING

The current average house price in Tudeley is in excess of £700,000 and therefore represents an expensive location for home ownership. The idea that affordable housing can be included within any development at the location, which will be a high cost site for developers is hard to envisage. The likelihood is that what is termed affordable is in reality at the upper reach of the average household. Developers would seek to minimise the number of affordable to maximise profits and the result would mean a significant number of executive type houses. Within Five Oak Green, less than a mile from the proposed site sit two 5 bedrooomed new executive homes. Both of these homes were empty for a year since completion and ended on the rental market, this questions the need for such homes.

Similar developments in Kent have brought a number of purchasers moving from London with the ideology that they are moving to the country and the fact that they can get more house for their money against London prices. The availability of the good rail connections from Tonbridge will encourage this, irrespective of the saturation of the railway by existing commuters. This will also raise the number of vehicles that will be travelling towards rail stations.

The 2016 Government Garden Settlement paper raised questions on the need for a garden settlement. These included, the siting of a garden settlement should not be where there is an existing community, Tudeley has an existing community. Garden Settlements should seek to help support local businesses and local workers, there are no immediate existing local businesses and as stated above, many potential residents would be commuters for London. Garden settlements should have the support of the local

community, in the case of Tudeley this is a firm no and is not built of nimbyism but is supported not just by the local community but by CPRE, London Green Belt Council, Tonbridge and Malling Borough Council and many residents from Tonbridge and other towns and villages that would be significantly detrimentally affected by these proposed plans.

The site of the plan includes old iron works and more importantly Bank Farm which until recently had been a working agricultural farm. An issue with building on working farmland is the fact that farmers tend to bury their waste rather than dispose of it through commercial and costly means. The result of the iron works and farm sites within the planned site is that extensive and thorough surveys MUST take place before any works. Such surveys must look at any contaminants or hazardous waste or soil. To build housing without such a survey could lead to harm to residents and potential expensive law suits against the local authority or developers. Such a survey would be costly and take time but it is vital that such a survey be carried out before this plan is considered any further.

HERITAGE / HISTORICAL ASSETS

The proposed developments would not only alter the landscape forever but the detrimental effects of pollution would increase, in particular noise, light and air. This would impact on the immediate population and also on the heritage assets that are in the Parish and that form part of Tudeley's uniqueness. One historical asset that was chosen specifically for its location and quality of light is All Saints Church Tudeley and the world famous Marc Chagall windows. To this day this church attracts visitors from all over the world to enjoy and view the wonderful windows. On reading the visitors book recently the overriding common theme of response to the church and the setting was the word 'peaceful' used time and time again. This would disappear if the church was surrounded by 2800 houses and busy and congested roads. The whole of the area is steeped in history and is mentioned in the Domesday book. Heritage assets are irreplaceable and should be conserved for future generations, there are more than 140 listed buildings in the Parish of Capel.

LIAISON WITH TWBC

From the commencement of this process there has been a considerable lack of information, misinformation and a lack of detail from Tunbridge Wells Borough Council. Mistakes have been made and specifically to us, our home was not included and shown as a freehold property on the map of the site of Tudeley New Town. Bank Farm Cottages as a group of four cottages were covered in 'pink' and incorporated within the new town buildings. This has caused a great deal of upset and has been hugely unsettling to ourselves and our immediate neighbours as our home is one of the few properties in the centre of the proposed development. Despite being one of the few owner occupied homes, the proposed town centre is placed immediately to the front of our properties. There seems to be a total disregard for the individuals in our community and our homes and security.

This mistake was made verbally to the planning officer on 5th August 2019, a month before the Local Plan was published yet it still remained incorrectly shown on the maps. Making enquires of the main planning consultants state that our home and that of our neighbours were not included within the maps sent to the local authority and this suggests that it is indeed the local authority that have made the error. In any case it has rendered our property unsellable until the situation is corrected. If it was indeed the council's error then it is another display of poor planning and lack of attention to detail.

I would add that the Local Plan of over 500 pages makes it extremely difficult to 'translate', navigate and then to try and understand the process to respond. It should have been made so much more straightforward to encourage all to respond and have their say. This along with a very complicated portal which has continued to crash has meant that many hours have been lost by those trying to enter their response.

SUMMARY

The large scale, disproportionate proposed developments in Tudeley and East Capel are unsustainable and unsound. They contradict the key arguments to greenbelt land and the local authority have not fully considered all other options. The Parish of Capel currently consists of approximately 940 homes, to add 4000 new homes in these two sites alone would devastate this small strong rural community sitting between towns in greenbelt. The sites seem to have been chosen entirely on landownership and deliverability. The senior planner stated that having a single landowner makes it a good choice, that should not be the reason for which it is a good choice. Development should be spread across the whole borough and not concentrated in one corner, the Parish of Capel have been allocated 60% of

the Borough's development in the proposals regardless of the land being Greenbelt and its very close proximity to the neighbouring town and Borough, Tonbridge.

Any plans such as this will always have some objectors but planning policy states that they should have the general support of the community. These plans do not. In the recent local government elections the swing from the existing Councillor to the new Councillor was enormous, with the new Councillor taking 75% of the vote with a much increased turnout from 5 years ago. This was the local objection to the plan, however, the resistance goes further. The Conservatives themselves lost overall control of the council during the recent elections due to dissatisfaction with their decision making and strategy. Add to that, the concern from Tonbridge and its residents to this proposal, this is not a 'NIMBY' objection, but a real one.

The building of houses needs to be sustainable with environmentally friendly solutions and that reduce the impact on wildlife and nature, whilst meeting the needs of local people. The special circumstances of greenbelt MUST be adhered to and greenbelt should be a last resort, not a convenient option.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The insistence that Tunbridge Wells places the majority of its housing in the one location is unfair and unjust, not just to residents locally and across the Borough but also to the residents of the neighbouring Borough who will have to take the fallout from this proposal, I would go as far as to state that its underhand.

Brownfield seems to be ignored and there has been a constant blinkered approach to this plan. At one meeting, the now resigned Leader of the Council was quoted as stating to protesters, 'There's no point wasting your time, its going to happen'. That kind of comment by a person with such authority at the time, suggests deals have already been done, legitimate or not.

Another landowner offered a good size of land, still within Capel Parish, to the north of North farm Industrial Park. This site, which would be bolted on to the existing town of Tonbridge Wells and not inflict problems on a neighbouring borough offered short walks to High Brooms railway station from across the location and abutted the Strategic Road Network A21 to the east of the site. This proposal, which was supported by campaign groups and the local Parish Council was immediately dismissed by Tunbridge Wells without review or consideration yet it seems to have everything the Tudeley site has and more, without the need for increased roads, genuine transport infrastructure already available and accesible, in the case of rail, without needing a vehicle. Without splitting a site in two by a railway embankment; reduced risk of flooding and no negative impact on a neighbouring borough.

Why was this site dismissed so quickly?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

☐ Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_82

Comment

Agent	Chris Frost [REDACTED]
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Company / Organisation	Future Planning and Development
Address	[REDACTED] London [REDACTED]
Consultee	Mr Mateusz Debczak [REDACTED]
Company / Organisation	Gold Property Development Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Gold Property Development Ltd [REDACTED] [REDACTED]
Comment ID	PSLP_1648
Response Date	04/06/21 10:33
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	PSLP_1555_Future_Planning
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Gold Property Development Ltd
Question 2	
Agent's Name and Organisation (if applicable)	Future Planning & Development Ltd
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR 1, STR/SS 1, STR/SS 3 and PSTR/LA 1 – see Comment Numbers PSLP_1555, PSLP_1647, PSLP_1648 and PSLP_1649. Attachments uploaded as supporting information]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Future Planning and Development act on behalf of our client, Gold Property Developments Ltd, in respect of their site, Lamberhurst Winery, Lamberhurst Down, Lamberhurst. This site is being promoted for residential development; it being sustainably located on the edge of the village of Lamberhurst.

The proposed submission version of the Local Plan identifies the requirement for additional land for housing in Policy STR1 and sets out a strategy for meeting this need. The proposed approach principally relies upon the allocation of large scale housing sites arising from the strategic urban expansion of Paddock Wood and the proposed Tudeley Village new settlement. Other than Tunbridge Wells, the Plan proposes only limited housing allocations for the other centres in the Borough, as set out in Table 4 - Distribution of housing allocations.

While it is acknowledged that paragraph 72 of the NPPF supports the new settlements and major urban extensions in order to achieve the supply of a large number of new homes, this must be brought forward in tandem with smaller scale development that is delivered more flexibly and quickly. It is our view that the Council's proposed approach to delivering the homes needed by the Borough is

fundamentally unsound, as it is entirely reliant on a small number of volume housebuilders to bring forward development at an unrealistic delivery rate. By contrast, a more even distribution of allocated sites across the Borough, which supports and enhances existing communities, would ensure a more successful and continuous delivery of homes across the Borough and throughout the Plan period. Small and medium sized sites, usually brought forward by SME developers, rather than volume housebuilders, should play an important role in delivering housing within the Borough, but the proposed delivery strategy promotes the opposite of this.

We therefore submit that Policies STR/SS1 and STR/SS3 are unsound. These policies cannot be amended to be made sound, so long as the strategy of the proposed Plan is to achieve the required number of additional homes through large-scale development in just two locations, as opposed to a more proportionate expansion of existing sustainable settlements across the Borough. It is not that one or other of these two sites should not be brought forward for development, but that they must be balanced by the provision of more housing on smaller sites in other settlements.

Policy PSTR/LA 1 sets out a strategy for Lamberhurst parish. Point 2 of this policy proposes to build approximately 25-30 new dwellings on land at Spray Hill, which is expanded at Policy AL/LA 1. We have no objection to the allocation of this site for housing and agree that the provision of additional housing in Lamberhurst Down is a sensible approach to providing for housing need in a sustainable location. However, we consider PSTR/LA 1 to be unsound insofar as it follows Policy STR 1 and fails to deliver enough housing across the Borough, for the reasons set out above.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to deliver the homes required by the Local Plan consideration should be given to the allocation of Lamberhurst Winery (SHELAA site reference 423) for housing. This site is being brought forward by a SME developer and is proposed to be delivered as soon as possible following the grant of planning permission. Officers have confirmed that the development of part of this site for affordable housing for local people is considered acceptable in principle and a planning application for this element is to be submitted imminently. This could serve as a first phase for the wider development of the site.

Policy PSTR/LA 1 should be modified to include the allocation of around 125 dwellings at Lamberhurst Winery (SHELAA site reference 423) and an additional allocation policy should be included (AL/LA 2) for the allocation of this site.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to clearly set out the case for an appropriate approach to housing allocations

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Carolyn Gunstone [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Carolyn Gunstone [REDACTED]
Comment ID	PSLP_916
Response Date	02/06/21 09:15
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Carolyn Gunstone
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Dear Sirs

I recently moved into East Peckham, being delighted with the area and very close, now I am widowed to my family. However I was aware at the time that development was planned at Capel.

Now however it is becoming very clear what such a vast development will effect all who live in the area. I really would like to express firstly, how almost cheeky it is for your council to propose such a development right on your border with Tonbridge and Malling district. The roads around here are very narrow and the fields are used for very productive farming. One that Covid has pointed out, even to people behaving like ostriches that we need to grow food well, we cannot continue to just import it from elsewhere. Your development would have major impact on all our small local roads. Your response would be perhaps to just widen them. The Medway valley doesn't respond well to flash floods as we have seen in the past. So more tarmac and concrete is certain to make this worse. Let alone a development on a hill, well wooded helping this environmental problem. That hill will be seen for miles around and the garden of England will be forever blighted. 4 thousand homes is the proposal. That means on an average of families 16 thousand more people and at least 4 thousand more cars. Medical care, schooling, in Tunbridge Wells or are you hoping to pass that issue into Tonbridge and Malling. I understand a new secondary school is planned at Summerhill. Edge of the busy A21, with all its potential pollution, I wonder if you have ever tried to drive on the Tudely road to the roundabout at 8-8-30 in the school morning, or tried to park and get on a commuter train. Or the other way into Paddock wood or Tunbridge Wells via the Pembury road or even the industrial park. These roads are at their absolute maximum now. Public transport would come to a standstill, let alone private cars.

I feel you as a council are taking the easy option. This area has seen the enormous deployment at Kings Hill. Do we actually need another. The centre of towns and cities are going to be quieter. Many companies are recognising there will be less need for the vast offices in their centres. It would make more sense to develop small sites by conversion of these spaces. People need homes, but we also need green spaces as lungs for our planet. Your proposal will severely damage any environmental credibility that you may aspire to. You cannot in 2021 propose such a damaging development. If you allow it to go ahead future generations living in this area will be living with the consequences for decades to come.

Please think environment first otherwise we will all be facing the consequences of your actions

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_85a-i

Comment

Agent	Chris Pattison [REDACTED]
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Consultee	[REDACTED]
Company / Organisation	Hadlow Estate
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Event Name	Pre-Submission Local Plan
Comment by	Hadlow Estate [REDACTED]
Comment ID	PSLP_1630
Response Date	04/06/21 15:44
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1630-1645_Turnberry for Hadlow Estate_SI-3_A-2_Highways and Transportation Report.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-6_A-5_Archaeology Assessment.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-2_A-1_Ecological Appraisal.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-9_A-8_Development Strategy.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-5_A-4_Heritage Constraints Appraisal.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-7_A-6_Landscape and Visual Appraisal.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-4_A-3_Flood Risk Review.pdf PSLP_1630-1645_Turnberry for Hadlow Estate_SI-8_A-7_Green Belt Appraisal.pdf

Data inputter to enter their initials here HB

Question 1

Respondent's Name and/or Organisation Hadlow Estate

Question 2

Agent's Name and Organisation (if applicable) Turnberry

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: for further comments by Hadlow Estate, please see Comment Numbers PSLP_1630-1645]

Question 4

Do you consider that the Local Plan:

Is legally compliant Yes

Is sound Yes

Complies with the Duty to Cooperate Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although we consider the Plan that the Plan is sound generally, we consider that certain details of the policies identified in our representations require amendment. These amendments are set out in our submitted representation and supporting technical evidence.

1 Comments on the Draft Plan

We have reviewed the Proposed Submission Plan and its supporting material to ensure the proposed spatial strategy for the Plan is both robust and justified in its identification of Tudeley for 2,800 homes. This section first reviews the Tudeley Village allocation and offers minor amendments to the detailed wording of the policy, before moving on to our observations on strategic and other supporting policies in the Plan. We set out our broad in principle support for the majority of the Plan's policies, however we make certain representations regarding amendments below.

Policy STR/SS 3 The Strategy for Tudeley Village

Housing

We support the revised delivery figures for Tudeley Village, which now confirm that 2,100 of the total allocate dwellings are to be delivered within the Plan period. Further to this, we support the policy requirements for high quality layout and design and good levels of permeability to encourage more sustainable modes of transport.

Transport

Paragraph 5.190 of the Plan states that the Five Oak Green bypass is largely required to alleviate issues caused by strategic development at Tudeley Village and the viability assessment shows that this can be delivered wholly by the Tudeley Village Garden Settlement. The supporting text should clarify that highway modelling will need to be updated to take into account the change in location of the proposed secondary school from that contained in the Regulation 18 Plan and the closer proximity to Paddock Wood will result in a greater share of increased traffic coming from this area such that the funding/ delivery strategy for the bypass will draw proportionately having regard to the impacts caused by each development.

[TWBC: for full representation, please see supporting documents]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We would refer to paragraph 3.14 of the Procedure Guide for Local Plan Examinations which sets out the circumstances in which representors may be invited to appear at examination stage. It would be helpful to the LPA as well as the Inspector if we were invited to participate to assist the Inspector's understanding of a soundness or legal compliance issue. Moreover, as we are suggesting helpful modifications it would be appropriate for us to participate in hearing sessions related to those areas within which we have suggested modifications.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Nicholas Harris [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Postern Lane Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Nicholas Harris [REDACTED]
Comment ID	PSLP_676
Response Date	30/05/21 10:17
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Nicholas Harris
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am the owner of The Wagon Lodge, Postern Lane, Tonbridge TN11 0QT. My house, which previously belonged to my mother from 1995 is currently rented out.

I know from experience how marginal the position is as to whether mine and other houses in The Postern Park hamlet of houses are flooded. Water can come from the Medway or more directly from the flooded excavated gravel pits to the North of the Postern Park houses. In times of heavy rain the water from the gravel pits can back up and overwhelm the drainage of our sewage systems. It is really imperative then in my mind that the landscape all around us is maintained as countryside and fields to maximise drainage in the area. By contrast a large area of hard surfacing such as would happen should the Tudeley village development be given consent, could significantly increase the risk of our houses being flooded.

Beyond this, the proposed village would multiply by many times the number of people living in Tudeley. This would not be an organic growth of an attractive friendly village surrounded by green fields in an area of Green belt and great beauty. The development proposed would destroy the nature of the existing village forever and obviate the reasons why current residents moved here.

My feeling then is that the proposed development would increase the risk of flood to mine and my neighbours' houses; also it is insensitive to the nature of our village as it currently is. The proposal could not be described as an organic and natural development of Tudeley

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Eddie Haydock [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Eddie Haydock [REDACTED]
Comment ID	PSLP_1757
Response Date	04/06/21 16:27
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Eddie Haydock
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Policy STR/CA1 The Strategy for Capel Parish

Policy STR/PW1 The Strategy for Paddock Wood

[TWBC: this representation has been input against Policies STR/SS3, STR/CA1 and STR/PW1 – see Comment Numbers PSLP_1757, PSLP_ and PSLP_]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have received an email from one of my Borough Councillors, Matt Boughton, containing a copy of a letter from him and fellow councillors Jon Botten and James Lark of Medway Ward on Tonbridge and Malling Borough Council to Tunbridge Wells Borough Council dated 02/06/2021 regarding the TWBC Local Plan Regulation 19 Consultation and encouraging me to respond also.

My comments apply primarily to "The Strategy for Tudeley Village" (Policy STR/SS3) and also to "The Strategy for Capel Parish" (Policy STR/CA1) and "The Strategy for Paddock Wood" (Policy STR/PW1).

Whilst I agree wholeheartedly with the points they raise and ask that the validity therein be both recognised, accepted and acted upon, I wish to take this opportunity to stress that their objections hardly scratch the surface in reflecting the horror many people in Tonbridge feel at the vandalism that these proposals will wreak upon their locality.

Unlike the councillors I needn't be polite and diplomatic. I needn't couch my words or be overly judicious. I needn't tread lightly, one step at a time and defer to my colleagues and fellow public servants. I have no "duty to co-operate".

In a previous email to you I outlined my objections in minute detail but since none has apparently been addressed, and it seems that many original problems have been exacerbated (the proposed permanent closure of Hartlake Road springs to mind) I feel my only recourse is to be angry and forthright and say unequivocally that it is disgraceful and shameful that TWBC are planning to rape the natural environment in such a blatant way, that an intolerable burden is to be casually shifted onto the infrastructure of an already overstretched area that isn't in their jurisdiction and that dangerous flooding issues are to be disregarded in what can only be described as a wilful act of destruction at best and a greedy, self-interested land grab at worst.

It's that simple.

Or is it?

It may be that those on TWBC who support the plan in its current form are just the "idle-minded overlings" to whom Kipling once referred?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Agent	Jacqueline Hayward. Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock wood Kent [REDACTED]
Consultee	Jacqueline Hayward Gant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Jacqueline Hayward Gant ([REDACTED])
Comment ID	PSLP_1268
Response Date	04/06/21 12:37
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mrs Jacqueline Hayward Gant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I'm agreeable to some new housing but to start the Mascall's site and Church Road Site at the same time as Green Lane site, the Hop Pocket old pub site and lose the orchards and fields down to the old Elm Tree pub. The site of the fish and chip shop on Maidstone Road, the development on the site of the old police station, the corner detached house in Church Road are all being made into several properties. Every space with fields, orchards and the oxygen we get from the trees are being destroyed. They cut down the old oak trees on church road and hacked through the ancient hedgerows before the ecologist was present. I'm sure she was only present as several of us demanded to know why they were destroying habitats with foxes, owls, rabbits and badgers and bird life including 2 small egrets that live near the Church Lane site.

No infrastructure pre builds, no school, no extra GP practices, no fire station ready as it is a retained station and then no police station.

The train station car park is always full pre building works. The trains are full by the time they get to Paddock Wood so how will the thousands of new people in the new builds get to work on the shortened train service, also they took away the trolley service on the trains.

The building of the retirement buildings behind Barsley's has meant another car park taken away. We have already lost the Barclays Bank and the HSBC Bank in the small high street/ Commercial Road.

The bus service is extremely irregular and very expensive.

They also want to build on the Memorial Park again concreting again for a car park and leaving millions of pounds in debts payable over a huge amount of years.

Why are they placing out of borough, London borough social housing in the Green Lane site when the have approximately 1000 people on the social housing list?

The fields that are being built on had orchards which soaked up excess water after heavy rain and also flooded parts of Paddock Wood pre new builds. Now the fields and orchard are gone the water table and Earth had flooded and they are building these houses on flood zones.

The idea of keeping the country green is a contradiction of cutting down everything on the green spaces and fields, approx it's possible that a paddock wood may have 3000/4000 more cars on the roads making it dangerous for children and adults with asthma, copd, and other lung conditions causing increased harm when the country is meant to be going green. The bottle neck of the Badsall Road housing is opposite a school with over 1200 pupils all walking to school and breathing in the additional car fumes, the babies and toddlers in prams and pushchairs level to the exhaust pipes.

I moved to Paddock Wood 17 years ago for its green spaces and small primary school and later the larger school.

I'm disgusted by the lack of accountability and decision making by the current conservative councillors voting for the developments when they are meant to be working with the local community who do not want this huge amount of housing placed in Paddock Wood and not spread out over Tunbridge Wells.

Why build over 50 percent of the housing in Paddock Wood and even more housing in Tudeley?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Linda Hewings [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] Five Oak Green [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Linda Hewings [REDACTED]
Comment ID	PSLP_429
Response Date	26/05/21 13:08
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	

Respondent's Name and/or Organisation	Linda Hewings
Question 3	

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

STR/SS3

Question 4

Do you consider that the Local Plan:

Is sound	No
----------	----

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Having been a resident of Five Oak Green for 7 years, living on the B2017, I am greatly concerned that the proposed development of Tudeley Garden Village will result in a significant uplift in the volume of traffic on this rural road. Bus provision is very limited, cycling along the B2017 is extremely dangerous and there is no pavement or path for walkers apart from in the village itself. The B2017 is designated 'Unsuitable for Heavy Goods Vehicles' so unless new roads (with Provision for walkers and cyclists) are fully constructed before any building starts it will spell disaster for the area. At present most of the village children can walk to school along the B2017 but increased air pollution will enganger their health and development, as has now been proven in London.

As there is now hard evidence of Global Warming and climate change we, as a nation, should be doing everything in our power to put a halt to this. This massive development proposed for Tudeley will see Green Belt land devastated, flood plains built upon and much needed quality farmland destroyed. Whilst there is obviously a need for new housing, this would be better sited near existing amenities where there is already infrastructure in place. There are a number of Brownfield and other under used sites in the borough that should be utilised before considering ripping up precious Green Belt land.

If the new proposed development goes ahead, it will not serve the needs of the local population, but would attract residents from London seeking to get 'more for their money'. Rail commuters in this area already face the prospect of standing all the way to the city and my understanding is that Tonbridge station is near capacity with no prospect of increasing this.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Rosemarie Hicken [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Rosemarie Hicken [REDACTED]
Comment ID	PSLP_1243
Response Date	04/06/21 11:40
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Rosemarie Hicken
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My initial comment is to express my disgust at the cavalier attitude displayed by TWBC to the residents of Capel and the surrounding area by utterly ignoring the overwhelming 97% opposition to the plan at Reg18 stage. A record number of comments were received at this stage (1174 comments from 804 people) objecting to the Garden village strategy but these have simply been brushed aside. So much for democracy and listening to the concerns of local people. TWBC is seeking to force Capel Ward - one out of 20 in the Borough, to take 51% of the housing target where the need for this amount of housing in the area has not been demonstrated.

When the Issues & Options document was prepared and issued for consultation, the majority of responses favoured a growth corridor approach over the garden village concept. The site at Castle Hill which has been put forward for development fits with the growth corridor approach and is more relevant now that the £200 million Kingstanding Way Business Park has been given the go ahead. It benefits from being adjacent to the A21 unlike the Tudeley development which is on the B2017. This site is also more suitable as it is closer to a main line station - High Brooms as opposed to Paddock Wood or Tonbridge. The architects of Tudeley new town optimistically include a station but Network Rail have not stated that they have any plans to provide one.

With reference to the Green Belt, the whole point of this was to prevent urban sprawl but this plan is designed to drive a coach and horses through that. Putting in a new town at Tudeley and the extension of Paddock Wood in Capel Parish by releasing Green belt land will open the door to further development. The Garden of England will rapidly become the back yard of London as there is no evidence of NEED for housing on this scale in this area. On March 3rd 2021 the Prime Minister answered a question from Mike Wood, Conservative MP for Dudley South regarding development and the Green Belt to which he replied "Indeed, Mr Speaker, we will protect our green belt, our vital green belt, and which constitutes, I think, 12.4% of our land, but we can build our homes, as my Right Honourable friend rightly suggests, 300,000 of them on brownfield sites across the country". As far as I can see, TWBC has not demonstrated that the exceptional circumstances required to justify development of the Green Belt exist. They have merely taken the easy route of accepting the offer of land from one landowner to dump 50% of their housing target in one ward, ignoring the brownfield sites which are available and re-purposing of empty buildings. The old cinema site in the centre of Tunbridge Wells which has been derelict for years being a prime example.

Biodiversity – bland statements about net gains for biodiversity. How on earth do you replace hundreds of years of nature building habitats for flora and fauna by planting a few urban street trees and sticking in a few green wedges. The whole concept is laughable except I see nothing to laugh about. I know just from what I see in my own garden, that this area is home to protected species – native slow worms, grass snakes, common lizards etc., never mind all the birds and mammals and yet ancient woodlands are seen as disposable by this Council.

New roads are proposed, a link road to the new Tudeley town and a Colts Hill by-pass which will take up more farmland. I struggle to understand why good quality farming land both for the Colts Hill bypass and Tudeley new town is considered suitable for housing. Surely the aim of reducing our carbon

footprint is better served by growing food locally. Once you have destroyed this land it cannot be returned to food production.

Provision of suitable housing – when left to developers, profit is king. The big expensive houses they want to build do not fulfil the needs of the community and will they sell? There are two new 4 bed detached houses in Five Oak Green which took nearly 2 years to sell. If the demand was there, why have they not sold? Is it perhaps because at £850k we can't afford them?

When the time comes in the not too distant future when I want to move into more suitable accommodation, I want a small affordable bungalow in the local area, something which is in very short supply and unlikely to be provided by these new developments. The overpriced retirement apartments with their no doubt high service charges which are springing up all over Tunbridge Wells are something I shall never consider buying.

Affordable housing is not something that developers want to provide, the need cannot be met by the market because it does not provide the profits required.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Many sites have been put forward for housing in the area which have been rejected by the Council in their pursuit of a single strategy of building on the farmland around existing built areas. The housing targets need to be distributed across the borough to serve the needs of local people not to provide relatively lower cost housing to the residents of London and Sevenoaks.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_43

Comment

Consultee	David Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Hughes [REDACTED]
Comment ID	PSLP_673
Response Date	29/05/21 16:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	dh TWBC Plan Tudeley STR SS 3 29 5 21.pdf
Question 1	

Respondent's Name and/or Organisation	David Hughes
---------------------------------------	--------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 for Tudeley Garden Settlement

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I attach my response in pdf format below Question 8

[TWBC: attached response has been copied below for ease of reference]:

28th May 2021

Representation on the TWBC Reg 19 Local Plan Consultation relating to the East Capel and Paddock Wood Development Plan

Policy STR/SS 1

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Introduction

As a local resident, I write to object strongly to TWBC's plans to build 3,450 new homes at Capel and Paddock Wood because the plans are not justified and unsound for the reasons set out below, particularly so alongside 2,800 new homes in a nearby planned 'garden settlement' in Tudeley. I also believe the plan will create considerable risks for and a major long term financial burden on TWBC.

Personal and Professional Background

I have lived in West Kent for almost all my life, living and going to school in Tonbridge and commuting from Tonbridge station. I have known Paddock Wood, Tudeley, Five Oak Green and Capel for nearly 60 years and we have owned a house in the area for some 35 years.

For over 10 years, I have been the Chief Investment Officer of a large, listed sustainable infrastructure group with some 300 infrastructure investments. These infrastructure investments include renewable energy and waste to energy plants, waste processing plants, hydropower, roads, wastewater treatment plants and affordable housing. So, I am experienced in assessing such plans and their risks, particularly from a long term financial view.

When I was a child, Paddock Wood and its environs was prime farming country with quiet country lanes, orchards and hop fields. Over the 60 years, the town and area have lost their farming focus with commuting from and within the area now predominating, with consequent traffic, parking and transport pressures. The lanes are no longer quiet. Tonbridge has grown substantially and similarly developed into a commuter focused town, as has Tunbridge Wells, both again experiencing the same increasing pressures.

Forecast Demand in the Borough

As explained below, many aspects of the Pre Submission Local Plan, the Infrastructure Delivery Plan, the Viability Assessment and the Sustainability Appraisal plus related Appendices prepared by TWBC are, from financial and risk viewpoints, **inadequately assessed and unsound**, some being based on unrealistic and arguably naive assumptions and if implemented could ultimately create contingent

costs and long term financial burdens on TWBC and also significant additional burdens on Tonbridge and Malling BC.

This entire planning process is based on a forecast. The forecast annual demand across the Borough is for 678 houses. In my experience as an infrastructure investor, I have found forecasts are just that, in that they are rarely met, often missed, delayed, based on wrong or false assumptions and are almost always adversely impacted by factors which were either incorrectly assessed or not even considered at all. The same is highly likely to apply to this forecast and the above two development plans. The two plans are essentially large commercial construction projects and, to be implemented effectively, require major support and infrastructure investment from various public and private sector parties over the long term which might only partially be made or not at all.

I shall leave aside any argument about how the considerable potential development profits and potential costs are not shared appropriately with TWBC.

The Alternatives

Through these plans, TWBC are endeavouring to meet a 20 year forecast in two, large, simultaneous steps which is simply unnecessary if only 678 dwellings are required annually.

A more local series of small, incremental, Borough wide, sympathetically designed housing developments, which could include some further gradual development around Paddock Wood, would be much more financially sensible, prudent, more controllable and much lower risk for TWBC and all the other relevant parties and so in practice be more flexible and achievable. The two plans are **not justified** on these bases. The Times recently indicated that 106,000 homes were forecast to be required in the whole of South East England in the next five years, of which no less than 3.2% are proposed in one small area of just one Borough which seems excessive and not necessary.

East Capel and Paddock Wood

The plan for East Capel and Paddock Wood envisages 3,450 new dwellings, of which 40% will be affordable homes. With 2.26 people forecast per dwelling, this implies 7,800 new residents. The Tudeley plan envisages 2,800 new dwellings being built, implying 6,300 new residents, together totalling 14,000 new residents, comprising perhaps 4,000 children (1,800 at Tudeley and 2,200 at Capel/PW) and 10,000 adults, if both proceed. Similarly, in terms of cars, it is likely that these residents will own some 6,000 cars (3,300 at Capel/PW and 2,700 at Tudeley) as some families with a working parent may need two cars while some elderly people may not have cars.

These two capital intensive and high risk projects are concentrated in one small area of the Borough where the existing infrastructure is poor or non-existent at Capel and Tudeley and so completely new infrastructure or heavily upgraded infrastructure will be required. To succeed, all the relevant infrastructure providers will need to agree and coordinate their investment programmes but, because the two projects are so long term, I believe investment returns are unlikely to be considered sufficiently attractive in the first few years to justify the major investment required, casting doubt on their implementation and viability. With two projects, almost double the capital expenditure will be required but by being close to each other, both projects will impinge on the other, potentially slowing the rate of sales (and infrastructure returns) of each. Phasing of all the infrastructure investment will be important and if not done or only partially done, the viability of the projects will again be brought into doubt. **The plans are accordingly not effective and unsound.**

Because of their close proximity, the two plans and their impacts are intertwined hence I have felt obliged to refer to both in the following paragraphs which cover the principal elements of the Capel and Paddock Wood plan which are considered unsound.

Impact on Tonbridge

Neither the Capel and Paddock Wood plan nor the Tudeley plan makes little if any real reference to the impact on nearby Tonbridge or to any consultation about these plans with Tonbridge and Malling BC. Tonbridge is already under much pressure and, as a result of both developments, will experience much heavier congestion, much greater pressure on schools and facilities, greater numbers of commuters and incur considerable additional costs. Parking in Tonbridge is a particular issue already. Tonbridge and Malling BC will bear much of the brunt of the practical issues arising from these developments. If both developments proceed, this will create a Tonbridge/Paddock Wood 'super town.' However, Tonbridge and Malling BC will receive no extra cash to cover these high additional costs.

There is no mention of how this development might impinge on, disrupt or possibly even support the plans of Tonbridge and Malling BC. This is an example of TWBC merely offloading issues and costs

to third parties by not planning properly. Without detailed consultation with Tonbridge and Malling BC, of which there is little evidence, and further investment in Tonbridge, **the plan is not justified or effective and so is unsound.**

Education

With only two primary schools and an expansion of Mascalls proposed, the plans to meet the educational needs of 2,200 children from East Capel/PW are simply inadequate, ignoring the needs of the many children from the other current developments in Paddock Wood itself. The planned provision for nurseries is similarly inadequate. For the 1,800 children from Tudeley, it is proposed to establish one new secondary school and one new primary school and expand Capel Primary School. Even when built, common sense says this secondary school of perhaps 1,000 pupils, new primary school of say 200 children and expansion of the small Capel primary school will be inadequate, and particularly so if both proceed. The remaining children numbering perhaps 1,500/2,000 will need to be driven or bussed daily to either Tonbridge or Tunbridge Wells (at least 50 or 60 busses twice or more each day). There is already incredibly strong existing demand for places in the good local schools in Tonbridge and Tunbridge Wells. It is naive to think that some 1,500/2,000 pupils will somehow be absorbed in the existing schools in these two towns - in practice many pupils will have to be driven or bussed far away to Maidstone or Sevenoaks, all adding to traffic and congestion.. In reality, another two or possibly three large schools will need to be built by KCC if both projects proceed. There will inevitably be children with special needs, the cost burden of which will fall on KCC and TWBC.

Again, TWBC will simply be imposing these education costs elsewhere, displacing the education of children in other Boroughs and creating congestion, particularly in Tonbridge and Tunbridge Wells.

The plans make no assessment of these education and congestion costs or whether KCC can or will agree to fund these new schools. **So, the plans are not effective and are unsound.**

Healthcare

Regardless of whether one or other or both projects proceed, the number of new residents will necessitate new healthcare facilities, the plans envisaging one new GP surgery which will be particularly busy and will require some 6 to 8 doctors plus support staff. If both proceed, there will be 14,000 new residents ultimately requiring these healthcare services. There will be considerable extra pressure and costs imposed on Pembury Hospital which is already strained. As stated in the plan, a significant number of the adults are likely to be over 65 and elderly, some with special needs and as they age, increasing demands will be made on local health services. The same will apply to the up to 4,000 children. All this will impose significant additional and increasing social services costs on TWBC and medical provision costs on the local Health Trust.

The plans do not properly address these issues nor quantify these costs so are **not effective and are unsound** and will impose potentially large contingent costs on TWBC.

Traffic Congestion. Roads. Rail, Parking and Public Transport

With some 3,000 to 6,000 additional vehicles, existing traffic congestion will become appreciably worse. The already busy **A228 road** to Pembury will be heavily used by these new cars and will need widening at considerable cost, none of which appears to be included in the plans. The Capel plan implies only £Gm will spent on improving links to this road. At peak times, there is already considerable congestion on the A228 and the roundabout at Five Oak Green and around Pembury and Tonbridge which will all be exacerbated by these additional vehicles. As regularly evidenced by sirens, the A228 is a major route for ambulances going to and from Pembury Hospital and it is perfectly possible that this congestion will threaten lives.

The already busy Tonbridge/Five Oak Green **B2017 road** will be heavily used by these new cars and is already in poor condition, being originally a country lane. This will be one of two principal access roads to the Tudeley garden settlement (the other being the feeder road from the A228) and as it stands will be totally inadequate when used by 3,000 to 6,000 new cars plus busses plus cyclists plus waste lorries and heavy construction traffic (possibly over 20 years). It is bumpy, windy, narrow in parts, prone to surface water flooding and if a cyclist is in front, prone to delay as you cannot pass. The plans make much of increased cycling but that will become increasingly dangerous on this road. The road has moved and settled over time, suggesting compaction and poor foundations. It will deteriorate further quite rapidly with increased daily use from up to 6,000 vehicles and heavy construction traffic. In other words, it will need to be both widened and effectively rebuilt. The Tudeley plan envisages only £3.1m being spent on widening which is totally inadequate. The proposed much shorter Capel by pass to the Tudeley garden settlement across open fields is estimated to cost £45m (only half the cost

of which is included in the plans) which gives an indication of likely costs which could easily be a multiple of this figure.

The plans are **not effective** in this regard.

With 50% of the working adults likely to **commute to London**, inadequate **parking** at Paddock Wood Station and with parking at Tonbridge normally full, there will be a major increase in journeys and congestion from 'dropping people off from the developments in Paddock Wood High Street or by Tonbridge Station and much illegal street parking in Paddock Wood High Street or Waitrose Car Park waiting for commuter trains to arrive. There is no scope to significantly increase such parking. Similarly the plans say that no extra trains can be made available so about 1,000 new commuters will try to travel at peak times on the few existing trains (which number is equivalent to some two or three additional trains). This will create overcrowding and adverse, knock on effects on other passengers further up the main line.

The plans do not properly address these issues and so are **not effective and unsound** in this regard.

Parking on the East Capel development is inadequate and insufficient for visitors.

The plans refer to making increasing use of **public transport**. In the plans, private bus companies have stated they will not run services at a loss and the plans show £3m of total bus subsidies. If these are insufficient, the costs of the services will contingently and ultimately fall on TWBC. The plans refer to creating **bus lanes and cycle lanes**. These will again necessitate road works and widening at yet again considerable cost to KCC. Again, there is no indication that KCC will bear these costs, casting doubt on timing and viability.

The plans have not been properly assessed and so are **not effective and unsound** in respect to these two aspects.

The Capel/PW plan proposes £5m will be spent on cycling routes and improvements while the Tudeley plan proposes £17.5m. This investment makes big assumptions about the take up of cycling by 14,000 new residents which I think are likely to be overoptimistic given the demographics.

Water and Flooding

The plans acknowledge Kent suffers severe water stress. The water needs of 14,000 people will create further localised stress. The current water supply infrastructure in the area is already inadequate and certainly insufficient to supply 14,000 new residents. The Capel/PW plan envisages only £220,000 being spent on water connection and the Tudeley plan only £154,000. This is another example of both plans simply pushing the cost of building major infrastructure onto another party which may or may not do so in their own time. In the medium term, the water shortage can only be met properly by further investment at Bewl Water or new reservoirs as aquifer abstraction is already excessive. The plans refer to residents reducing water usage to 110 litres per person per day but this is likely to be an unrealistic and possibly naive assumption as water consumption is currently much higher.

Paddock Wood already suffers from inadequate sewage and waste water systems, as demonstrated by several sewage floods to the East of the town over recent years. Because of the flat, low lying nature of East Capel, all water will need to be pumped in and away requiring yet more investment which yet again is not assessed or quantified. The Tudeley and Capel/PW plans have each budgeted only £450,000 for sewage and foul water works which is woefully inadequate for 14,000 people.

The plans are **not effective and unsound** in this regard.

With the River Medway, Kent's biggest river, **flooding** regularly, this has major ramifications for any development around Capel, Paddock Wood and Tudeley. I remember the severe floods of 1968 (with landing craft going down the sandbagged Tonbridge High Street) while other severe floods occurred in 2000, 2001, 2013, 2014 and 2019 despite the Leigh flood barrier being in operation (please refer to the web for pictures and videos). The Medway contains much treated sewage water so any such flooding has other effects.

Surface water flooding in the area is frequent, connected with overflowing streams, drainage and sewage. East Capel is particularly prone to flooding. The small streams are prone to blocking during heavy rain which causes local flooding. Only in January 2021, Badsell Road was blocked by flooding, with an AA van parked nearby for two days to pull out cars from the flood. Nearby Five Oak Green is prone to surface water flooding and I clearly remember the Fire Brigade pumping out houses on occasion in the last few years. In heavy rain the B2017 can be dangerous from surface flooding as I have personally experienced while the A228 near Whetsted suffers similarly. The fields where the East

Capel development is proposed are often waterlogged in Winter. The proposed North Paddock Wood development will be similarly liable to flooding.

Surface water flooding is a bigger problem than fluvial or sea flooding nationally and so the East Capel site is doubly prone. These are major problems which have not been properly considered and **so the plan is not effective and is unsound**. If the East Capel and Northern Paddock Wood development areas regularly flooded, that part cannot be sustainable so **the plan is inconsistent with national policy**.

In other words, the question is when, not if, will the inevitable flooding occur.

The following comments (a) to (g) relate to flooding at East Capel and Paddock Wood:

- . The plan indicates suitable steps will be taken to mitigate the risk of flooding but this will require major investment in bunds, flood gates and barriers, flood storage, drainage and pumps. The plans are not particularly clear referring to £991,000 to be spent on flood defences and a raised platform costing £5.3 million. This will be totally inadequate to protect 3,450 homes on a flood plain which is also prone to surface water flooding. Again the nature and costs of such mitigation measures are not properly explained nor is how such costs will be borne, by whom and over what time period. However, given the flat nature of the land, it is likely to be £10s of millions, not low£ millions;
- . Any such flood mitigation measures will disturb water flows and ground water, increasing the risk of flooding on neighbouring land and properties, as well as increasing flood risk downstream. This may well require even more mitigation measures about which there is no mention at all;
- . Flooding causes insurers their biggest losses by far. Given their heavy losses from increasing floods nationally, insurers are increasingly selective about insuring properties on flood plains and without that mortgages cannot be obtained. **Without good mortgage availability, the East Capel and Northern Paddock Wood developments would simply not be viable. I did not find references in the plans to this key underlying assumption nor to the likely attitude of insurers or the cost of flood insurance.** Flood insurance rates could be high and, after the first flood, might only be obtainable at expensive rates or on unacceptable terms or possibly not at all, leaving homeowners stranded with unsellable homes. This has already happened elsewhere in the UK. As a sustainable infrastructure investor, I am putting increasing weight on the possibility of an asset becoming stranded from such environmental events and will not approve such investments;
- . These houses will be expensive but with the enhanced flooding risk, it is likely that they may have to be sold relatively cheaply, below the forecast prices, to attract purchasers. This casts doubt on the financial viability of the scheme but yet again the plan makes no reference to this possibility;
- . As the East Capel and Northern Paddock Wood sites will be developed in phases over 20 years, flooding during that time is inevitable. It is possible that the site might then be only **partly finished** and not developed any further post such flooding. In that event, it is highly likely that planned improvements, infrastructure and facilities will not be completed or built - in other words, the plan as currently envisaged would then only be partially implemented which casts doubt on its objectives being met and viability.

This has not been assessed and so the plan is **not effective and particularly unsound** in this regard.

- . Much is said in the plan about Suds on which only £745,000 is proposed to be spent for 3,450 dwellings but this ignores the fact that the water table is already high and just mimicking nature will not help the water drain away - it will need to be pumped away to be effective, again requiring significant investment and cost which is again not assessed or quantified.
- . Finally, following the inevitable floods, TWBC will incur considerable costs dealing with the aftermath e.g. emergency shelter, displaced families, damaged infrastructure, as will the KCC and the emergency services. With ever more limited financial and human resources, TWBC would do well to avoid this risk and potentially large costs, never mind the reputational impact.

The plan is **not effective and particularly unsound** in the above regards.

Electricity, Gas and Broadband

As no new houses can be connected to the gas grid from 2025, the two developments will need to be powered entirely by electricity. This will require extensive investment in major HV transmission lines and stepdown transformers, particularly as new EV charging infrastructure will be required eventually for some 6,000 cars given that petrol and diesel cars will be phased out after 2030. All the cables will need to be buried. This is a major engineering task in addition to road building, road widening, school

building, GP surgery, sports facilities etc. The Capel/PW plan budgets £10.5m and the Tudeley plan budgets £11.5m solely for electricity connections and diversions with no discussion about grid infrastructure or who pays for these or how construction will be phased. In my experience, the cost of the grid infrastructure and substations will be many £millions and will not be installed for several years. If completely new generation capacity and HV systems are needed, I broadly estimate this will cost over £100m for the two developments.

FTTH broadband will be relatively more straight forward to install.

The plan is unclear on this important aspect and so is **not effective and unsound** as a result.

Waste Disposal

The disposal of waste from up to 6,250 new homes will require TWBC and KCC to invest in more waste disposal facilities. This will create yet more heavy vehicle movements on already congested roads and add to the waste already trucked away from North Farm. These additional costs do not seem to be factored into the plans and will be a charge on the annual rates which would rise slowly over time to a total of only some £10m once all 6,250 homes had been built.

Affordable Homes

Although there is a clear and pressing need for affordable homes, it is important to recognize that these may well impose actual and contingent risks and costs on TWBC. As an example, with joint ownership or rent to buy structures, if the tenant defaults in paying rent whether deliberately or through illness or unemployment, it is difficult for any Council to take any action and particularly not evict, leading to losses and costs. The same is true if the tenant does not properly maintain the rent to buy property or ever behaves in an antisocial manner. Through rent to buy, the Council would usually forgo an element of rent and not participate in any increase in the value of the property. Any Council needs to carefully assess such risks and costs which could be particularly significant for 2,500 houses, being 40% of 6,250 new houses, over say the next 30 years.

Financial Overview

As can be seen from the above, neither the Capel/PW nor Tudeley plan properly addresses the financial implications of many important elements arising from their respective development. The plans make a considerable number of assertions and assumptions, the latter both stated and unstated, about how major infrastructure investments will be made and do not properly assess the risks, timings and potential costs. These include:

- the touching confidence that S106 or CIL payments from the developers will cover many of these costs. These payments will not be applied to the 40% affordable housing element, only to the privately owned 60% element of the 6,250 homes. The Viability Assessment suggests a CIL of £150 per sq metre and that the average house will be around 100 square metres. So the potential total CIL payments could in theory be around £94m (£52m for Capel and £42m for Tudeley) but are subject to negotiation which means they could be appreciably less. The developer will probably only pay over time, perhaps of up to 20 years as houses are built so the net present value will be much lower. Since a lot of investment will need to be made in the early years, there will either be a funding shortfall - to be met by TWBC? - or facilities and improvements will only be built over many years with increasing likelihood they will either not be built at all or only at a smaller scale.

The plans do not show detailed cash flow projections or sensitivities and, more importantly, who or how any funding shortfalls will be met and so yet again are **not justified** and may create large contingent liabilities for TWBC.

- that all the various government bodies, KCC, organisations and utility and other companies will invest heavily to facilitate these two developments. Against the present Covid backcloth and huge debts, it is unlikely that government bodies or KCC currently have the money to make such major investments while utility and other companies will have many alternative, lower risk projects in which to invest offering better risk adjusted returns. Examples in the plans are the bus and rail companies which have already expressed their reluctance to invest or want subsidies.

As explained, by proceeding with these developments, TWBC will be assuming substantial additional risks and costs at a time when it is particularly cash strapped and resource limited. These costs will not be anywhere near covered by the annual rates charge which I estimate will slowly increase up to £10m in year 20, being an average of say £1,500 per annum on 6,250 houses.

The two developments are expected to take some 20 years to be fully completed. However, much of the infrastructure referred to above needs to be installed within the first few years to enable such development. So sewage pipes and systems, HV transmission lines and substations, water mains etc need to be installed before any significant development can be completed. But there will be few paying customers for the first several years, leading to effectively little or no return on the invested capital for many years. The same point relating to timing then arises about cash strapped KCC investing in new schools and the two £multi million (perhaps £100m?) major road investments. These will not be built for years (which puts in doubt if they will ever be built) meaning the plans as drafted are likely to be fiction. The corollary is that there will be further growing congestion and inadequate infrastructure for many years.

Affordability

House prices in TWBC are the second highest in Kent. The plans emphasise that affordability of the houses will be 'very challenging' and suggest a sales price of £650,000 for a small 4 bedroom 150 square metre house on a large mixed housing estate which will be developed for some 20 years. From a financial perspective, this would not be a good investment as price rises will be low as supply continuously increases over time. From an environmental viewpoint, living in a large building development doubly prone to flooding with a big mortgage and construction ongoing for 20 years may not be overly enticing to potential buyers. I have doubts that people will be able - or possibly willing - to afford these prices and, as the viability of the whole development depends on selling the 60% at these prices to pay for the 40% of affordable housing, it raises doubts about whether the developments will ever be completed. The plan is **not effective or justified** accordingly.

Greenbelt

TWBC seem to have focused on two particularly high risk, high cost, long term developments on the first available flat land in the Borough outside the AONB boundaries, notwithstanding this is protected Green Belt on and near flood plain and largely dismissed smaller, significantly lower cost, lower risk opportunities offering considerably more flexibility to meet demand as it gradually arises over time. Instead, TWBC believe in their own forecasts over 20 years and want to go for two big solutions simultaneously. From a financial and risk viewpoint, this is unwise as forecasts are rarely met and, as explained above, there are big costs and risks attaching to each plan. If a small development does not work, the fall out is manageable which cannot be said of the two developments proposed. With local incremental development, infrastructure investment will also be incremental, more likely to be made and more manageable. As such, I do not believe there are sufficient exceptional circumstances to justify declassifying Green Belt land for these two developments and the plans are **not justified**.

Summary

It is clear for the reasons stated above that the Capel/PW development plan is unsound. It has not been properly assessed in a number of areas, is high risk and high cost in many ways compared to the alternatives and creates large and unnecessary contingent costs on TWBC.

The plan should be dismissed accordingly.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

So I may comment on any further consultation on matters raised by the Inspector

If you would like to attach a file in support of your comments, please upload it here. [dh TWBC Plan Tudeley STR SS 3 29 5 21.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Deborah Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Deborah Hughes [REDACTED]
Comment ID	PSLP_446
Response Date	26/05/21 16:13
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Deborah Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 - Tudley	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

24th May 2021

Objection to TWBC's Development Plan for Tudeley Garden Settlement

Policy STR/SS 3

As a long standing Tonbridge resident, with my mother in care also in Tonbridge and friends and relatives in the area, I am writing to register my very strong objections to TWBC's plans to develop a huge 2,800 housing estate on Green Belt land at Tudeley. This will effectively be a large new suburb of Tonbridge with TWBC benefitting from the rates while we residents and Tonbridge and Malling District Council will carry a lot of the extra costs and have to deal with the major problems which will arise. Many of my friends have expressed similar strong objections to me. TWBC are largely just dumping the adverse effects of this development on Tonbridge residents and TMDC with very little thought and, apparently, no real consultation with TMDC. As a result, **the plan has not been positively prepared** as it thoughtlessly passes its problems on to the next Borough.

TWBC have ignored other cheaper sensible options across the Borough and gone for an unnecessarily high risk big solution on Green Belt land which is a breach of the law as there are no exceptional circumstances for this assessment. **The plan is not justified.** With 2,800 homes, the plan has not properly considered many factors and should be scrapped as it simply does not work. Some of these factors are:

Affordability – the 60% private houses will be small and very expensive. I doubt if people can afford to buy these houses in such volumes and who would want to live on a huge housing estate, with building going on for 20 years? If not sold at these high prices, the viability of the development could be jeopardized. The plan is **not effective or justified** accordingly.

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge Road and overloading of the already busy roads in Tonbridge, especially in school term and the peak mornings and evenings. There will be gridlock at peak times. **The plan is not effective about this issue.**

Parking on the development is inadequate and makes little provision for visitor parking. Parking in Tonbridge is already inadequate and cannot cope with the likely increase. With more commuters, no

extra trains and no extra parking at the stations, there will be chaos near the station at peak times. **Again the plan is not effective.** I note the emphasis on increased numbers of cycling but this is naïve as it will make little difference - cycling on the busy roads is already dangerous and many accidents will ensue.

The plan fully acknowledges that the northern part of the site is in a high risk flood area. I have seen many floods in the area with some local roads blocked for days because of the Medway flooding. Surface water run off is another problem with local streams often flooding, a problem exacerbated by the sloping nature of the site. These are major problems which have not been properly considered and **so the plan is not effective and is unsound.** If a large part of the development is regularly flooded, that cannot be sustainable so **the plan is inconsistent with national policy.**

One new secondary school and one new primary school combined with a doubling of Capel Primary will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There will be even more pressure from the large number of children from the Capel and Paddock Wood developments despite the two planned primary schools and expansion of Mascalls. In reality, KCC are not going to invest in all these schools in one small area given the requirements in the rest of Kent and their own cash shortages so there will be a large shortage of school places. Schools will only be built after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and be paid for by someone else.

There are literally no services like electricity and water anywhere near the site so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from the Tudeley development and potentially the Capel development will create major water supply issues, not forgetting sewage issues, the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

As can be determined from the above, **the plan has not been thought through properly, is essentially flawed and unsound.**

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Joseph Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Joseph Hughes [REDACTED]
Comment ID	PSLP_672
Response Date	29/05/21 16:17
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Joseph Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am an 8 year old resident of Tudeley and I have lived here for the whole of my life. I have also attended Capel preschool and I am currently in year 3 of Capel Primary school.

I am writing to you to express my concerns about the proposed Capel development. Do you realise the impact this plan will have to the local area? I want to raise my three key points that I am very worried about and highlight the major issues for these points.

Firstly, I would like to highlight the devastating impact the plan will have on the local wildlife. Some rare species may become extinct and lost from this area. The wildlife will be losing 600 acres of greenbelt land that is their home. Also, the trees and hedgerows will be lost forever and will make some wildlife homeless. I will be extremely upset to see this wildlife disappear for good and never appear again in my garden.

I am also concerned about the quality of the air and pollution from the extra cars, buses and also lorries. The air quality will become awful for everyone living in the area and will be damaged forever. The air may even become deadly and poisonous to humans and local wildlife. Please rethink your plans as we cannot let people die from this extra pollution. We must try to keep the air clean for the future generations.

Do you think it is wise to build thousands of new houses on a flood plain? The flood risk will increase for the existing and new houses and they may all flood as a result. With climate change the glaciers are melting which means more rain will fall and rivers and streams locally will overflow more regularly. A road close to my house, Sherenden Road, has a history of flooding with flooding of the roads and adjacent fields up to 3 feet deep in places and this will be in the heart of the Tudeley village. Do you want my house to flood along with the rest of them in Tudeley?

In conclusion, I would like you to carefully consider my comments I have raised in this letter. The threat to local wildlife will be at its highest that it could ever be if the area is developed. I am also concerned about the air quality because of pollution and its effects for future generations. Finally, I have highlighted the effects of flooding in the area and how this will get worse if the development goes ahead. Please do not turn our beautiful countryside garden into a garden village

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Louise Hughes [REDACTED]
Comment ID	PSLP_671
Response Date	31/05/21 14:32
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Louise Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We have lived in Tudeley in our 'country cottage' for the past 15 years and our Son attends Capel Primary which is a small village school with a one year intake. We are concerned about many aspects of the proposed local plan but we have highlighted a few of the issues that are of particular concern to us as a family.

The traffic on the B2017 can sometimes be congested back to where we live due to traffic congestion in Tonbridge and with traffic that is travelling to the Somerhill schools site. I was commuting by car to work in Tunbridge Wells pre Covid (and will return to this in due course) and used to experience congestion on most days getting either round Tonbridge or actually getting into Tunbridge Wells so surely the proposed garden village will just make this congestion far, far worse. The primary school is also on the B2017 and the traffic speed and volume outside the school in the morning and at end of school is dangerous enough. We have witnessed several near misses so the increase in traffic and a proposed secondary school next to the primary school is just going to make this issue worse and the children's safety at even more of a risk. I also like to go running from our property and had a near miss in November last year with a car. I have only now just gained the confidence to go out again but I feel like I am taking my life in my hands every time I go out the door based on the traffic now. Most of the residents that will move into these proposed new properties will drive privately owned cars and will not use the bus or cycle use that we are lead to believe by TWBC. There are currently 2,452 people living in Capel. This will increase with the proposed local plan to 13,700 plus people. How is this sustainable and the impact on the air quality will be damaging for generations to come. There has been no consideration to the pressure that Tonbridge and Paddock Wood Railway Stations will see when a good proportion of the new residents are commuting to their employment in London. These properties will not be affordable to the local people on local pay, they will be affordable to the persons who work outside of the area.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. The Five Oak Green Road itself is like a river when we experience high rainfall and floods at several points which makes it an extremely dangerous road and no doubt that some of the new houses would flood if the local plan goes forward. This happened in January and February 2020 when we had several storms sweep through the area and gave rise to flooding in Five Oak Green and along Alders Road. This problem will just get worse if you take away the farmland and concrete over this.

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land. We regularly have deer and wild boar in the field to the back of our property.

Our bird visitors include woodpeckers, green woodpeckers, buzzards, hawks, robins, blue tits, chaffinches, bullfinches, goldfinches, doves. Other animals include weasels, stoats, foxes, adders and

we had a visit recently from a little owl. Bats are also seen at dusk flying round the garden in the summer months. These will all decrease in numbers or disappear completely. Our property is in green belt and AONB. The AONB is to the rear of our property, green belt to the front. If the local plan goes ahead what is going to stop TWBC then looking to build on AONB in future years? Also TWBC stopped us years ago extending our property due to the location being on green belt land so how can TWBC plan to build 1000's of houses on green belt land? This green belt land stops the urban sprawl between Tonbridge and Paddock Wood, this plan will effectively join both together.

There is no set infrastructure plan from TWBC ? When are these plans going to be released? Once building has started? Surely the infrastructure should be in place to support a new 'town' prior to the development. It should not as an afterthought especially with the known pressures we have already with traffic. The local plan proposes 15 plus years of large construction sites active in the Capel area with enormous infrastructure issues. There is also no logic to the plan in terms of the distribution of planned dwellings as 51% of the local plan housing is being forced on Capel parish where only 2% of the TWBC population live. Capel is the easy option with one landowner and looking at brownfield sites seems to have been de-prioritised by TWBC.

For the above reasons the local plan needs to be stopped in it's current form.

Question 7

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No, I do not wish to participate in examination hearing session(s)

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sarah Hughes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Sarah Hughes [REDACTED]
Comment ID	PSLP_434
Response Date	26/05/21 14:21
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Sarah Hughes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Tudeley Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

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Question 5

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Objection to TWBC's Development Plan for Tudeley Garden Settlement

Policy STR/SS3

As a long standing Tonbridge resident, educated in Tonbridge and with relatives in the town, I particularly object to TWBC's plans to develop a huge 2,800 housing estate on Green Belt land at Tudeley. This will effectively be a large new suburb of Tonbridge with TWBC benefitting from the rates while we residents and Tonbridge and Malling District Council will carry a lot of the extra costs and have to deal with the major problems which will arise. Many of my friends have expressed similar strong objections to me. TWBC are largely just dumping the adverse effects of this development on Tonbridge residents and TMDC with very little thought and, as far as I have heard and can tell, no proper consultation with TMDC. **The plan has not been positively prepared** as it just pushes the resulting problems into the neighbouring Borough.

The whole point of Green Belt land is to act as a buffer against encroaching development between towns and protect the environment, nature and landscape yet TWBC seems to somehow think there are exceptional circumstances here to break this important law. The Tudeley development ignores other better, cheaper, more practical and sensible options across the Borough with TWBC choosing one large excessive solution, effectively washing their hands of better alternatives. The plan is **not justified** and the policy is **unsound**. With 2,800 homes, the plan has not properly considered many factors and should be scrapped as it simply does not work. These include:

The northern part of the site is in a high risk flood area. I have seen many floods in the area because of the Medway flooding including near to where I used to live. Surface water run off into local streams often creates flooding, a problem exacerbated by the sloping nature of the site. Nowhere near enough attention has been given to these major problems and so **the plan is not effective and is unsound**. I cannot see the lower part of the development being sustainable if it is regularly flooded so **the plan is inconsistent with national policy**.

There will be a huge increase in traffic on the poorly maintained and heavily used Five Oak Green/Tudeley/Tonbridge Road and overloading of the already busy roads in Tonbridge, especially in school term and the peak mornings and evenings. There will be gridlock at peak times so yet again the plan is **not effective**.

Parking on the development looks inadequate for residents and makes little provision for visitors. Similarly, parking in Tonbridge is already inadequate and will be worsened by the huge increase in vehicles from the development so yet again the plan is **not effective**.

Affordability – the private houses representing 60% will be relatively small and very expensive. I doubt if enough people can afford to buy these houses in such volumes and who would want to live on a huge, expensive housing estate, with building going on for 20 years? If high prices are not obtainable, the viability of the development will be thrown into doubt. The plan is **not effective or justified** in this regard.

A large increase in commuting will be inevitable and as a longstanding commuter, I know only too well the current day to day practical difficulties. With more commuters, no extra trains and no extra parking at the stations (and I simply do not believe the words in the plan about more cycling – try cycling on the Tudeley/Tonbridge road), there will be chaos near the station at peak times.

One new secondary school and one new primary school combined with a doubling of Capel Primary will be inadequate for the large number of children from the development which means even greater pressure on schools in Tonbridge and Tonbridge Wells with lots of daily school buses adding to the traffic volumes. There will be even more pressure from the large number of children from the Capel and Paddock Wood developments despite the two planned primary schools and expansion of Mascalls. In reality, KCC are not going to invest in all these schools in one small area given the pressures across the rest of Kent and their own cash shortages so there will be a large shortage of school places. Schools will only be built years after the children are actually living there. **So, the plan is not effective and is unsound.**

There will be huge extra pressure on all other local facilities in the area such as hospitals, social services, elderly care and dentists. The plan assumes the resultant required investment will all just happen and costs be paid for by someone else.

There are literally no services like electricity and water anywhere near the site so the cost and length of the project will be much greater than infill or brownfield site developments elsewhere in the TWBC Borough area. **The plan is therefore not justified.**

Kent is desperately short of water and adding the population from the Tudeley development and potentially the Capel development will create major water supply issues, not forgetting sewage issues, the systems for which are already poor in the Paddock Wood area. The plan is **not justified or effective** in this regard.

Although the plan might look good on some planning architect's drawings, it is essentially **flawed and unsound**.

Question 7

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Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sharon Hunt [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Sharon Hunt [REDACTED]
Comment ID	PSLP_1143
Response Date	03/06/21 19:38
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Sharon Hunt
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

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My name is Sharon Hunt and I have lived in Tudeley for 14 years. I moved here because of the Green Belt, Dark Skies, AONB and to be part of a village community and not part of a new town. I have worked at Tunbridge Wells Hospital in Pembury as a medical secretary for a cardiologist for the past 8 years.

I am writing to you to raise my strong objections to Tunbridge Wells Borough Council's recently published Local Plan proposal to build over 4000 homes in the Parish of Capel in both the areas of Tudeley and East Capel. I live in the village of Tudeley and work at Tunbridge Wells Hospital.

Healthcare

Tunbridge Wells Hospital is a new hospital only opened in 2011/2012 and it is already too small for the area that it serves. Since opening the hospital has already had to add three new wards to cope with the increase in population. The hospital is struggling now to see people who have been referred on time so that they do not breach government set targets patients are waiting months for appointments, this is risk to life. This problem has now been exacerbated due to the Covid-19 pandemic and the waiting lists are very long as clinics, investigations and elective surgeries had to be cancelled during the height of the pandemic. The hospital does not have enough staff now let alone enough beds and even if they did have enough beds there would be no staff to look after the patients. Already during the winter many elective surgeries are cancelled this will only become a bigger problem with 2,800 more homes - possibly at least an extra 5,900 people. GP surgeries are closing throughout the borough and some are combining and my own surgery is struggling to employ GPs and exists on a trail of locums, a garden village is supposed to have everything it needs within its boundaries if we can't get GPs for already existing surgeries or doctors and nurses for the hospital in this area how can a whole new surgery and the existing hospital be fully staffed.

Agriculture

Capel is a rural Parish that sits within the green belt and the High Weald AONB, there are currently approx 900 homes in the Parish. CA1 and East Capel are mainly agricultural land, including orchards which I believe are protected, mostly grade 2 and 3 agricultural fields (which are in short supply in Tunbridge Wells borough as a whole) and not poor agricultural land as has been claimed by Tunbridge Wells Borough Council, many of these orchards and fields growing much food for this country for multi-national companies such as Ribena who buy substantial amounts of blackcurrants from Sherenden Farm. CA1 if built on will deprive the nation of some 6,175 tonnes of produce over 5 years. We should be aiming to be a self-sufficient borough and country not cover good agricultural land with concrete particularly now that we have left the EU, surely we need to grow more food and protect our excellent agricultural areas to feed our nation.

GeologyThe geology of the site (CA1) would appear to make it an illogical choice it comprises heavy clay susceptible to expansion when wet and shrinkage when dry increasing the risk of subsidence, in turn this would lead to high build costs. Any deep foundations for retaining structures could damage

the sensitive mud and sandstones which lie over and control the natural aquifer. Puncturing of these mudstones and sandstones may have very serious consequences to groundwater equilibrium. Building to allow water to pass under foundations would only lead to movement of the structure.

Biodiversity

An agreement was signed and reached with 190 countries including the UK to halt the loss of biodiversity by 2020 (DEFRA) and to ultimately increase biodiversity, this development clearly goes against DEFRA's agreement as there can only be a loss of biodiversity if this huge development is built, despite claims that there will be a net biodiversity gain, I fail to see how this is possible when woodlands, fields, agricultural land and streams will clearly be greatly affected by this development not to mention birdlife, mammals, reptiles, insects, fish and other organisms all important to the protection of our village, town, borough, country and world as a whole. Diverse wildlife including many red list species, yellowhammers, skylarks, lapwings, house sparrows, swifts, all species of Owl and EU protected species such as Great Crested Newts, Dormice and bats (many species of bats). A news item on BBC Southeast News on 13 November stated that dormice are now in danger because of loss of habitat and climate change in the south east, we should be striving to protect our species not deprive them of valuable habitat.

The government has spent some £6 million on research into Ash dieback, there are many ancient, veteran and mature healthy Ash trees in both CA1 and East Capel. There are also some 30 veteran Oaks and a huge number of mature and newly growing Oaks and Ash trees along with ancient woodland which will suffer if this development goes ahead as the ecosystem will not remain as it should as mammals, bird, reptiles, insects and other organisms will leave these ancient woodlands and the woodland will suffer from this loss. The balance of nature is fragile and we constantly distress and destroy it instead of protecting it.

Domestic Animals and their Impact on Wildlife / Wildflowers / Ancient footpaths

A development of this size 2,800 homes would also introduce a significant number of household pets, particularly dogs and cats. 25% of the UK population own a cat and equally 25% own a dog. This will introduce at least 700 cats and 700 dogs (best case scenario as many people own more than one dog or cat) the numbers are not per household but per adult so potentially many many more dogs and cats, my figures are conservative (PDSA.org). This will have a significant effect on wildlife, cats enjoy hunting even when well fed, they will travel several miles from their home to hunt, they will also just maim and not kill leaving prey in agony and potentially young without adults to care for young birds, mammals, reptiles etc. Dogs will also affect ground nesting birds if off lead, this will lead to ground nesting birds leaving their broods and chicks being lost. If dog faeces are not cleared up this will have a detrimental effect on wildflowers and will increase the growth of nettles and thistles to the detriment of rare flowers such as the orchid and true fox sedges etc. (SWT.org) 700 dogs being walked twice a day on ancient footpaths will have a severe effect on these old walkways. These footpaths are part of the openness of the greenbelt and the open views will be lost to concrete. As a footnote it should be taking into consideration that since the Covid-19 pandemic pet ownership throughout the country has increased by 11% so we can add a further 11% more dogs, cats and other pets to this scenario - these numbers encompass all pets but the majority being cats and dogs (Pet Manufacturers Association)

Heritage

Capel has a unique culture and heritage. There are two Grade 1 listed churches All Saints and St Thomas a Becket, All Saints being famous worldwide for being the only church in the world with windows all created by Marc Chagall who so loved the location and light created by the setting of this church that he chose to design all of these windows after being asked to do one memorial window for the Goldsmid family, how sad he would be at this legalised vandalism of our greenbelt. The proposal to build such a huge number of homes would have a significant impact on the churches, the rural landscape, environment, community and wildlife, changing the Parish beyond all recognition and in effect wiping out two small and happy communities. Tudeley which currently has around 96 homes would effectively no longer exist as a historical village, by building 2,800 homes, this would also cause the loss of the all important green belt buffer from Tonbridge, which would result in urban sprawl development from Tonbridge to Paddock Wood.

Flooding and Water Supply

The suggestion of so many homes in this location is not sustainable as there is no infrastructure and will lead to a greater risk of flooding both locally and further along the River Medway floodplain, putting at risk other built up towns and villages and villages that already have a flood problem such as Yalding and East Peckham to name just two, this is clearly a danger to life. There is already a problem with supplying water for homes in this area with 2,800 new homes this will be an impossibility. In 2013 CA1, East Capel, Tonbridge and surrounding villages flooded badly, again please think about the danger to life. In 2019/20 there was significant flooding in both Five Oak Green and Tudeley, so much so that someone was actually able to swim down the middle of the road in Tudeley (Hartlake Road) - a significant danger to life.

Transport

The trains from Tonbridge and Paddock Wood are already at capacity, you are lucky to get on the train let alone get a seat, the service would not be able to cope with the additional commuters, and they will be commuting as there are not enough jobs in this area to sustain the huge number of people expected to live in these developments and the council would be naïve to think this is not the case. Already the homes in Paddock Wood are being marketed in London with season tickets paid for by developers as the incentive for moving to Paddock Wood from London. Homes for local people will clearly not. The train company have already advised that they are not able to put on any more services or extra tracks and no further station will be built. This train line is a two track rail line to London and the coast and this cannot be changed as there is at least one two track tunnel to London. The developers and Tunbridge Wells Borough Council have already been told that the rail company will not be putting a station in at Tudeley Garden Village as this will affect the timetables significantly because the trains will not be able to get up enough speed to keep the train timetables as they are, the line is not long enough to warrant another station between Tonbridge and Paddock Wood and the cost would be huge in £. Most commuters will drive to Tonbridge or Paddock Wood stations to get to London the car parks are already full, of course some people will cycle but not everyone and anyway with everyone cycling where will they park their bikes the station is already full of push bikes.

Housing Needs

Increased housing should be developed in proportion to existing population numbers across the borough. There are brownfield sites and other sites which already have infrastructure in place, there are over 100 brownfield sites that are known to the council, there must be many many more. There were 450 sites offered in the call for sites, 20 homes on each site would fulfil the government's 2014 methodology requirements for housing in Tunbridge Wells, some of this number having already been built. However, Tunbridge Wells Borough Council should be working with the 2016 methodology as the 2014 methodology was found to be incorrect due to NOS as advised by the government, if the council worked with the 2016 methodology as required and instructed by the government it would need to build 4,000 **less** homes than this local plan has decreed need to be built, thereby negating the need for these two new towns in Tudeley and East Capel. Much of the land proposed in Capel for development has a single landowner and the simplicity in developing that land should not come before the significant detrimental impact it would have both on greenbelt and also the impact the development would have on the High Weald AONB which borders the proposed site.

Impact on Neighbouring Borough – Tonbridge and Malling Part of the site of the proposed development sits at the very edge of the Borough next to the border with Tonbridge and Malling. Any increase in population within Capel would result in a significant demand upon the neighbouring Borough without the plan or infrastructure to cope and without the benefit of the added council tax. This development would have little or no impact on Tunbridge Wells town itself but all the monetary gain. Tonbridge and Malling Council have questioned the Soundness of Tunbridge Wells Borough Council's local plan and have put in their objection and asked for Tudeley Garden Village to be removed from the plan.

Government's Garden Village Criteria

Under the Government proposals for garden Villages and settlements they recommend that they are not built where there are existing settlements but should be new and discrete, the government also advise that brownfield sites should be built on before greenbelt, there are enough brownfield sites in Tunbridge Wells Borough to satisfy the housing needs / numbers expected by the government. There

is nothing discrete about the proposed plans which would be situated in existing settlements and as previously stated effectively wiping out the village of Tudeley. The Government also advise that garden villages and settlements should have local support, I would suggest that this is clearly not the case in the Tudeley Garden Village proposal. In addition, it is likely that the existing railway line would dissect the proposed site at Tudeley which does not support garden settlement principles but actually creates two villages (towns). The village will not initially be self sufficient as there will be no school, no station, no shops so the idea of a garden village that has everything is not feasible - people will have to leave the village for work, shopping schools etc.

Road Network, Pollution and Climate Change

The roads are already severely congested so presumably another road would have to be built which would cross greenbelt and AONB, this is just unacceptable and may move transport through the development area more quickly but will just end up polluting and congesting Five Oak Green, Capel, Tudeley, Tonbridge and surrounding towns and villages to an even greater extent than they are congested now, Tonbridge in particular is a town full of small, narrow roads. The pollution caused by all this additional traffic in a greenbelt area will just add to the problems of climate change and building on greenbelt where many trees, ancient and veteran (the lungs of the world) exist will be devastating for our clean air. There would be significant light pollution from this development and will have a considerable impact on the AONB as currently this area enjoys dark skies and clearly this would be lost as 2,800 homes will produce considerable light pollution.

Costs

The Council have already wasted £10 million of Tunbridge Wells' taxpayers hard earned money on a vanity project in Calverley Park which has now been voted out and abandoned. How much has been wasted thus far on this ill thought out local plan for a new town, another vanity project using the wrong methodology in assessing numbers required, use the right methodology (2016 not 2014), this would be the professional and correct way forward. The council and employees, planners, etc are paid by local taxpayers and as such should be representing the needs of the constituents of this borough, clearly they are not representing us at all just trying to make a 'name' for themselves with another badly thought out 'vanity project' to try and attract people from London, not housing for local people to be able to stay in their own villages. We do not need 2,800 houses in Tudeley to house our local people.

General Comments

This proposal it is ill thought out and unsustainable and is detrimental to both local residents' health, physical and mental. I believe this is a lazy plan and has only been proposed so that the council do not have to deal with multiple landowners and just have to deal with one in Tudeley, (this site was not on the first call for sites and as such not planned for as rigorously as should be) this should not be a reason for this development. This is not a special circumstance ! The council have also not advised what their 'very special circumstance' is for building on greenbelt and greenbelt that is excellent agricultural land as there should be a special circumstance as required by the NPPF, and I have to ask why not !

The plan preparation process did not include Tudeley until after the issues and options process in 2017. This means that the largest housing area in the plan did not go through most of the plan preparation process. There is no greenbelt study, no landscape assessment, no biodiversity assessment, the Local Plan isn't complete enough to be ready for The Inspector when these two areas (the biggest development in the borough) have not had the same level of assessment as the rest of the plan. The issues and options process led to most people – some 60% - wanting a growth corridor led approach, less than half wanted a garden settlement and that was when they did not know a garden settlement would involve the destruction of many acres of precious greenbelt and have a significant impact on the AONB. Protection of greenbelt was a key priority for people who participated in the issue and options consultation the plan should be re-written to implement a growth corridor led approach to protect green belt and I stress again that the correct methodology should be used 2016 as instructed by the government!

DO THE RIGHT THING – PROTECT OUR GREENBELT – PROTECT OUR CLEAN AIR – PROTECT OUR DARK SKIES – PROTECT OUR WILDLIFE – PROTECT OUR WILD FLOWERS - PROTECT OUR ANCIENT TREES – PROTECT OUR FOOD PRODUCTION - PROTECT OUR HISTORIC VILLAGES - PROTECT OUR FUTURE

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make this plan sound two other sites should be considered Castle Hill which already has significant infrastructure available, including schools, shops, offices, workplaces, buses and a train station along with very quick access to the A21 without driving through small Kentish villages.

Another site is the old Blantyre Prison which is standing empty and could be utilised for many many houses, this is a brownfield site.

There is also a large site in the centre of Tunbridge Wells where the old cinema used to be that has been standing empty for many years, surely this could be utilised within the plan.

Tunbridge Wells Borough has enough brownfield sites within the borough to satisfy the governments figures for housing development without building on our precious Greenbelt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Christopher Hyatt-twynam ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Christopher Hyatt-twynam ([REDACTED])
Comment ID	PSLP_987
Response Date	02/06/21 22:55
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Chris Twynam
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
policy STR/SS 3 strategy for Tudeley village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

For 36 years my wife and I have lived on Hartlake Rd in Tudeley Hale. We are just outside the edge of the proposed Tudeley village development. Being retired now, twice every day I walk from my house in all directions through this beautiful part of the Medway valley with its open vistas, large skies and extensive bird and insect life. 2800 houses and their residents will affect everything in no positive way. For the people and wildlife who gain so much from this unique valley I totally oppose the Tudeley village plans as a simply dreadful idea.

Assuming Tunbridge Wells Council have to build 2800 houses somewhere in their Borough (this itself is dubious), let's look at the Pros and Cons of choosing Tudeley as the location for the new village/town.

Pros: (reasons to build here)

- 1 One landowner makes it easier for the Council to deal with.
- 2 There's a mainline railway through the middle of the site so the Council can pretend (against statements from British rail), that residents can use a train and not drive anywhere.
- 3 The site is sloping and just above the Medway flood plain so only existing residents and villages such as Yalding downstream will receive the runoff from roofs and tarmac while the new houses should be OK.
- 4 The site is right on the edge of the Borough so income will go to Tunbridge Wells and problems to Tonbridge at only 2 miles away.
- 5 The site is Green Belt so easier to build on than the AONB just across the road.

Cons: (reasons to build elsewhere)

- 1 Its a very green an beautiful slope down to the flat and lush Medway valley. The construction will be obvious to all from the North East with views of it from most of Hartlake Rd, Golden Green and Three Elm lane, the Medway itself and all the way up to East Peckham old church. A 300 acre eyesore visible for miles.
- 2 Transport. The road from Five Oak Green to Tonbridge is a winding country road already stationary at times. Residents will be driving to Tonbridge and then trying to access the services there or driving to reach the A21 corridor for Tunbridge wells and Sevenoaks. I live here and use that road for 70% of my journeys. The road is not suitable for more traffic and the access into Tonbridge is very slow even at quiet times. Tonbridge is a busy town with the car parks and roads already near their capacity. Not all the children are going to attend the proposed school, with such excellent other schools nearby as options. The new village would be an urban extension of Tonbridge as the old village is a rural extension now. Amazon deliveries alone from the A21 will be a challenge. A railway station which is most unlikely is not going to make this village in any way sustainable.
- 3 Cooperation of neighbouring Borough. Tonbridge Council demanded a robust objection to the Tudeley village (meeting 17 May 2021). It would be a disaster for Tonbridge and would alter the very nature of this lovely market town.
- 4 Noise pollution. I can hear the skylark and buzzards from my garden. They and many others will have to move away.

- 5 Air pollution. Forcing a village of residents to drive to get anywhere or most things will add pollutants to the countryside air. Never mind all the gas and oil boilers.
- 6 Light pollution. The Poacher pub is the main light polluter in Tudeley. It can be seen from a fair distance at night. The village will be like a beacon in comparison extending to areas of countryside which have next to no light pollution now.
7. Agriculture. PSLP EN20 The loss for ever of 300 productive acres of grade 2 and 3 land is a travesty if it can be avoided and goes against current Government ethos.
8. Alternative site. The proposed development option of 1800 houses next to Tunbridge Wells Retail park would seem far more suitable as residents could walk or cycle to the park and High Brooms railway Station. It also has easy access to the A21 corridor and cannot be seen from most directions. Also the land is grade 4 agricultural land and although AONB is difficult to compare favourably with Tudeley.
- 1 Community. The railway splits the proposed village into 2 halves with just one existing narrow tunnel lane joining them at the present time. The cost and disruption to a mainline railway of building more tunnels make their future existence questionable failing the whole village plan.
- 2 Biodiversity. PSLP EN9. DEFRA's biodiversity 2020 a strategy for England's wildlife aims to halt overall biodiversity loss. This area of Tudeley is rich in biodiversity. KMBRC records show 53 bird species considered to breed here. 70 species of bird regularly rely on the Tudeley site to overwinter or breed. TWBC promise a 10% increase in biodiversity once they have built 2800 homes on 300 acres and let loose 800 cats, 1000 dogs and numerous rats on the surrounding area. They are just playing with figures and not reality.
- 3 Local housing need. Does that mean drawing people from London to come and live in the new urbanised countryside.
- 4 Urban sprawl. The new village simply reduces the green belt breaker between Tonbridge, Five Oak Green and Paddock Wood. What we need is green corridors not urban ones.
- 5 New link Rd. The local plan shows a link road from Capel school to the A228. Straight through green belt and next to AONB to try to get traffic to and from the proposed village to Tunbridge Wells. From experience most traffic will wish to reach Tonbridge or Maidstone and M20 rather than the congested streets of Tunbridge Wells. How many houses will need to be built before this road materialises and breaks up another rural area.
- 6 Litter pollution. Since the lockdown many more people are making use of the footpaths along the Medway here in Tudeley. Unfortunately previous unspoilt picnic places are now suffering from left cans and packaging. It is good to see people especially younger members of society getting outside. The litter and group sizes of picnickers along the river is manageable at present but I fear the river will be overrun with an additional 6000 people within walking distance of it. Too little rural space left for the population.
- 15 .Church. The grade 1 church of all saints at Tudeley is world famous and visitors can enjoy the Chagall windows and view the church overlooking a green field. The new village will extend down behind the church for as far as you can see.

The whole plan for Tudeley village is **unsound, unsustainable and unrealistic**. The village would destroy an area mentioned in the Domesday book for ever.

The local council elections showed the lack of faith and lack of agreement the populous of the Borough and certainly Capel, have for the Council. The chairman has been forced to resign and the Conservatives have lost their majority against the general tone in the Country.

The Tudeley village plan should be removed from the Local Plan saving this area for the enjoyment of the future residents of Tonbridge and Five Oak Green for ever.

Question 6

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Remove Tudeley village from the Plan

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jose Hyatt -Twynam [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jose Hyatt -Twynam [REDACTED]
Comment ID	PSLP_1006
Response Date	02/06/21 23:10
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jose Hyatt-Twynam
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

STR/SS 3 Allocated site for Tudeley Village

I object to the inclusion of STR/SS 3 as an allocated site for development in the PSLP. It is unsound, not legally compliant.

For the following reasons:

- . At the Draft Plan stage the Tudeley Site had not been included in the thorough appraisal that other allocated sites within the borough had. There was no Green Belt Study, no Landscape Assessment and no Biodiversity Assessment.

It hadn't been put forward as a site for assessment at the initial Issues and Options Stage, where the majority of people favoured a 'corridor led approach' to development. Less than half wanted a garden settlement. Protecting the Green Belt was found to be a priority for most.

This meant that the largest housing proposal in the area did not go through the full plan preparation process, meaning that residents didn't have the comprehensive information for making representations at the Regulation 18 stage of the process.

- 1 The PSLP paragraph 4.80 states 'Engagement in planning, especially of larger more complex sites, is critical. The greater the engagement with the local community, as well as the Council and other key stakeholders, the more weight can be given to any master planning approach. There has been very little community engagement.

At Regulation 18 TWBC received over 1,000 objections to the Plans negative impact on Capel Parish. In 2020 even more dwellings have been added to Capel. Residents are certainly not being 'listened to', contravening paragraph 4.80 and the advised contribution to a 'master planning' approach.

The PSLP is therefore not legally compliant.

Garden Village & Master Planning approach.

The Tudeley Village is being promoted as a development designed on Garden settlement principles, which is claimed to be an appropriate, sustainable and effective means of meeting housing needs.

This is debatable. 5.174 of the PSLP states 'a sustainable community' includes the following qualities
1. Clear identity: a distinctive local identity as a new garden community 2. Sustainable scale: built at a scale which supports the necessary infrastructure ..

The location at Tudeley is unlikely to be a 'stand alone' community as it is located only 2 miles from the centre of Tonbridge. The population will gravitate towards Tonbridge for services, particularly the station for the easy commute to London.

The site is divided in to 2 by the railway line and in effect is '2' developments. with limited means of crossing the railway and the planned 'phasing' of the development through the plan period and beyond, it isn't going to be a 'sustainable community' with for many years. Meanwhile it has a huge negative impact on West Kent, particularly Tonbridge with the potential of an extra 4,000 vehicles on the roads.

The PSLP is therefore unsound.

Transport & Infrastructure

The plans for Tudeley Village are based on Garden Village principles which encourage the use of public transport and in this case rely on a railway station within the development site. British Rail are against a station as it will be too close to the stations of Tonbridge & Paddock Wood. It will not be built within this plan period and unlikely to be permitted after 2038.

This major development cannot be justified on a railway station that will never materialise; this is 'unsustainable' contravening the NPPF (paragraph 10). Therefore the PSLP is unsound.

Although the purpose of the master planning approach is to combine development with improved infrastructure, there is no guarantee that this will materialise and no timescale for their completion. New roads come at a very high environmental cost. The new Five Oak Green link road and Colts Hill by-pass will be taking Green Belt, BMV agricultural land and border the AONB and encouraging vehicular usage all of which contribute to 'unsustainable' development and contravene government policies.

The additional traffic created by development in Tudeley will add to the heavily congested roads in Tonbridge, which can already be grid locked at certain times. Tonbridge & Malling Borough Council (TMBC) are very concerned about the effect on the town. Their response to Regulation 18 includes 'However, the proximity of some of the major development proposals to the borough boundary and specifically, the south east of our main settlement of Tonbridge, is a matter of serious concern due to the potential impact on the local highway network, rail services and other community infrastructure including health care and education, particularly when combined with planned developments in Tonbridge as part of our own Local Plan.'

At a recent TMBC Extraordinary meeting of the Planning and Transportation Advisory Board Meeting (17th May 2021) the Councillors were very vocal in their request for writing a 'robust' objection to the proposed scale of development in Tudeley. The only person who was prepared to 'soften' this response was Ian Bailey the Planning Policy Manager for TMBC, who gave the impression that it was a case 'if we scratch their (TWBC) back they (TWBC) will scratch ours..', when he reminded the Councillors that TWBC would need to cooperate with their own Local Plan. No doubt this would be to fulfil the 'Duty to Cooperate' as a legal test of soundness of TMBC's Plan.

This is not a good reason for justifying the removal of 180 ha of green belt, BMV agricultural land when other options are available.

The PSLP is therefore unsound.

Biodiversity PSLP EN 9

NPPF Paragraphs 170 -183 give guidance on 'conserving and enhancing' the natural environment including sites of biodiversity, by 'minimising impacts on and providing net gains for biodiversity'. The process of building 2,800 homes at Tudeley can only cause significant harm through direct removal of habitat and indirectly through noise, vibration, light and chemical pollution, to the existing flora and fauna in this area. The ensuing effect from all these factors plus the impact from domestic pets will be devastating on the wildlife.

To calculate Biodiversity losses and gains, planning applications will use DEFRA's Biodiversity Metric 2.0. The metric takes into account factors such as habitat distinctiveness and condition to give an overall score, known as 'biodiversity units.' TWBC are one of the early adopters of Net Gain policies in advance of national rollout. As the methodology is very much in its infancy several research projects (Durrell Institute of Conservation and Ecology, Lancaster Environment Centre) are underway assessing the true long-term effects on ecology in development sites.

The biometric has come under criticism for being based heavily on habitat rather than species, and weighted towards habitats such as deciduous woodland rather than cropland which is considered of low-ecological value and subsequently being lost. This could have devastating consequences for the significant populations of UK declining field bird species such as Lapwings, Linnets, Yellowhammers and Skylarks observed on the Tudeley farmland.

Looking at the 'Biodiversity Evidence Base Update of February 2021' it is apparent that the 'desk-based' reviews by Stantec, which at the moment appear to be the only ecology assessments of the area, have only used Kent & Medway Biological Records Centre (KMBRC) data up to 2018. Since then many local residents have recorded sightings of flora & fauna. The KMBRC themselves also state "...the lack of information for a geographically defined area does not automatically imply a low biodiversity value for that area: it may simply be under recorded." Taking into account the use of out of date data and the likelihood of 'under recording' of flora & fauna, the initial baseline that Ecologists will be using to calculate the biometric and consequently the 10% biodiversity net gain, will not be a true reflection of the biodiversity at Tudeley.

Many of the bird species recorded by the KMBRC in the proposed site at Tudeley and its environs are 'red-list' Birds of Conservation Concern and some of 'Principal Importance'.

The preliminary Stantec desk-top assessments on ecology concluded the following:

"Phase 2 Surveys: Surveys for protected and notable species potentially present within the Site and detailed botanical surveys (potentially including hedgerow and woodland survey) will be required to establish the ecological baseline for the site. Surveys are seasonal and should be completed early in the project programme to ensure pertinent information is available to inform master planning"...and;

"Master-planning Input: In order to protect key ecological resources and demonstrate biodiversity net gain, early ecological input to the scheme design is needed to ensure suitable mitigation for designated sites, habitats and species is embedded."

As yet there appears to be no on-site surveys available for scrutiny, contradictory to Stantec advice of 'early ecological input', which is necessary for demonstrating biodiversity net gain. Apparently a comprehensive Environmental Impact Assessment is not required until the Planning Application stage. This must be fundamentally wrong with development on this scale and will surely contribute to the worldwide loss of species.

The removal of and disturbance of habitats is contrary to the following policies and worldwide agreements:

- * The Tree Health Resilience Strategy 2018 to increase and encourage healthy woodland.

- * DEFRA's Biodiversity 2020: a strategy for England's wildlife and ecosystem services aims to '...halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks.'

- * The Global Agreement for the halt of biodiversity loss 2010–20 set an ambition to halt overall loss of England's biodiversity, and is mirrored by the

- * EU Commission's Biodiversity Strategy 2010–20 and the UN Convention on Biological Diversity: Strategic Plan Targets for 2020.

The area in Tudeley supports a myriad of wildlife including protected species such as Great Crested Newts, Dormice and Bats. KMBRC records show four species of bat (common pipistrelle, soprano pipistrelle, brown long-eared and noctule) all EU protected.

KMBRC have records of Great Crested Newts, an EU protected species near Bank Farm, the centre of the development site. I have also registered sightings in our garden which is approximately 300m from the edge of the proposed Tudeley Village. The likelihood is that they also inhabit the deep drainage ditches around Sherenden Farm. The Stantec 'Desk Top' Ecology Report also verifies this "...*there is the potential for this species and other amphibian species to be present within on-site and nearby off-site ponds/ water bodies and to use terrestrial habitats within the site during their terrestrial phase (for the great crested newt the core terrestrial area is c. 50m around pond, and this species can use habitat up to 500m from breeding ponds).*" Significant measures need to be put in place pre-development, such as translocation and additional mitigation. Such measures can be astronomically costly anything between £2,200 and £100,000 per newt (as quoted in press releases), depending on what is deemed necessary, this might contribute to questioning the viability of the development. There is little detail yet of the planned mitigation measures to protect these species apart from minimal 15 m buffer zones around habitats which are not enough to protect the Great Crested Newt.

The land at Tudeley is rich in bird life KMBRC records show;

-
- . 70 species of birds regularly rely upon the Tudeley site, over winter or during the breeding season.
- . 53 bird species are considered to breed within the proposed site.
- . 12 breeding species are **Species of Principal Importance** as listed in the Natural Environment & Rural Communities (NERC) Act 2006.
- . 10 species breeding within the site are also on the **Birds of Conservation Concern Red List**, the highest conservation priority, largely due to significant population decline as a result of habitat loss and change in agricultural practices.

Yellowhammer, linnet, lapwing and skylark (all Species of Principal Importance and Red List) occur within the proposed site in high densities and all three species are undergoing significant population declines. The proposals can only exacerbate this decline through the loss of suitable fields. Indeed, with the proposals and gravel excavations, habitat will be squeezed from all sides, leading to a further and inevitable decline in numbers; a loss not just for the area but nationally.

The following bird species have also been observed (by sight or sound) by residents of Capel Parish:

*Key: UK Red List: red or amber/UK Biodiversity Action Plan Species: **

- . Blackbird / Blue Tit
- . Carrion Crow / Chaffinch / Chiffchaff / Collared Dove / Common Buzzard
- . Goldcrest / Goldfinch / Great Tit / Green Woodpecker / Greenfinch / Great Spotted Woodpecker
- . House Sparrow* / Kestrel / Linnet* / Magpie / Robin
- . Skylark* / Song Thrush* / Starling* / Stock Dove / Swallow / Swift
- . Whitethroat / Wood Pigeon / Yellowhammer*

Bullfinch*/Cuckoo* /Dunnock* /Fieldfare/Grey Wagtail /Heron /Jackdaw/Kingfisher /Kestrel/Lapwing* /Lesser Spotted Woodpecker*/Little Egret /Martin (Sand &House) /Meadow Pipit /Mistle Thrush /Nightingale /Nuthatch /Peregrine Falcon /Pheasant /Pied Wagtail /Red Kite /Redwing /Reed Bunting*/Short-toed Treecreeper /Sparrow Hawk/Spotted Flycatcher*/Stonechat/Tree Sparrow*/ Turtle Dove*

Four species of owl also occur in the area – Tawny, Little, Barn and Long-eared - itself an unusually diverse number. Note: There are few long-eared owl breeding pairs recorded in Kent; any loss would be a serious conservation concern.

Onsite Ancient Woodland, hedgerows and ponds not only provide habitat for various fauna but also flora. Of particular significance is a large population of Early Purple Orchid plants growing in the Ancient Woodland south of the railway line. The species is threatened by destruction of habitat. Encroachment by increased footfall to these woods can only add to its loss.

The NPPF Paragraph 175(C) states ‘ development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be REFUSED, unless there are wholly exceptional reasons AND a suitable compensation strategy exists.....

The scale of this development results in removal of habitat, creates fragmentation of the existing ‘green infrastructure’ with new roads and houses. Combine this with minimal mitigation measures can only add to the demise of species, undermining all the government policies to halt biodiversity loss.

The Durrell Institute of Conservation and Ecology question the delivery of Biodiversity net gain and the ability to hold developers to account in their words ‘unfortunately, our analysis also shows that the governance might not be there to ensure these promises are kept for habitats delivered within the footprints of proposed development’ . There is no mention by TWBC in the PSLP of a governance mechanism in place to ensure biodiversity is monitored and achieved, despite a requirement (PSLP Section 6; Development Management Policies (E9 Biodiversity Net Gain) stating it should be ‘for the lifetime of the development’.

The cumulative effect of development on biodiversity across the whole parish should be taken very seriously. Capel Parish totals 5228 acres, including Five Oak Green. The proposals would see development on 600 acres, or over 11% of the Parish, to accommodate 4,800 homes, or a third of the entire Borough’s supposed housing requirements. Paddock Wood is targeted for thousands more, bringing the total in one area to over 65% of the Borough’s development plans.

Development proposals will almost join Tonbridge , Tudeley, Five Oak Green and Paddock Wood together creating an urban sprawl across a rural Parish, all of which is in the Metropolitan Green Belt. The problem is exacerbated by Kent County Council (KCC) authorising gravel extraction in Capel on a further 200 acres. With additional plans for a Five Oak Green by-pass and partial Colt’s Hill by-pass proposal, Capel will lose well over 15% of its countryside to development of one type or another.

The cumulative environmental impact is likely to be far greater than if each proposal is considered in isolation.

TWBC continues to view the developments as separate, and neither Borough or County councils have discussed the wider impact of their plans upon the parish, despite stating in the PSLP EN14 6.179 *“In making decisions about the acceptability and location of new development, the Council will seek to avoid and reduce habitat fragmentation”*.

It must be apparent that any such assessment would demonstrate that the proposals, if viewed together will have greater negative consequences. This would be true not just for biodiversity, but for other matters, including flooding, the historic landscape, pollution, and so on.

Natural England’s 2005 research paper ***“Going, going, gone? The cumulative impact of land development on biodiversity in England (ENRR626)”***^[1] states, *“Cumulative impacts threaten many of the government’s sustainable development objectives. Development that ignores the threat of cumulative impacts cannot be called sustainable because it is contributing to a net reduction of biodiversity in England.”* (p.6 point 5). The main types of cumulative impact are listed as: habitat loss, habitat fragmentation (the breaking down of habitat into smaller units), disturbance (such as noise, light, vibration, recreational activity, pet predation), and chemical or biotic pollution. All of these aspects will feature heavily given the significant size of the proposals across Capel.

TWBC promise of a 10% increase in biodiversity on site is unrealistic; combine this with failure to acknowledge the unsustainable effect of cumulative impacts on biodiversity and the PSLP is unsound.

PSLP EN 20 Agricultural Land

The NPPF 2019 states that Local Planning Authorities should protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals and protect all soils by managing them in a sustainable way. Policy EN 20 of the TWBC PSLP reinforces that statement.

To help inform LPA decisions on appropriate and sustainable development the agricultural land classification (ALC). ALC is graded from 1 to 5. Grade 1 being the highest and most consistent yielding with less input and it has the widest range and versatility of use. BMV agricultural land is graded 1 to 3a.

-

The land to be developed in Tudeley is Grade 3 (185 acres of productive land) to the south of the railway line and Grade 2 (121 acres) to the north (source Provisional Agricultural Land Classification 1977 Mapping). Contrary to the SHELAA for the Draft Plan at Regulation 18, page 8 which states that the land is all Grade 3. This is wrong and misleading information on which councillors were making a decision to vote on the DLP. **This factor alone makes the PSLP unsound.**

Grade 2 is 'very good quality agricultural land' with the potential to grow a very wide range of agricultural and horticultural crops giving high and consistent yields. Crops commonly include: top fruit, for example tree fruit such as apples and pears, soft fruit, such as raspberries and blackberries, salad crops and winter harvested vegetables.

Grade 3 is land capable of consistently producing moderate to high yields of a range of arable crops, especially cereals, or moderate yields of crops including: cereals, oil seed rape, grass, potatoes, sugar beet and less demanding horticultural crops.

According to 6.241 only 4.4% of land in the borough is Grade 2 and above, (meaning that land north of the railway line is particularly valuable), while 78% is Grade 3. However, some of the Grade 3 land also has agricultural constraints due to topography and other factors, but to lose even some of the best quality land in the Borough at a time when food production is so vital, and when there are alternative poor-quality alternatives available, seems locally and nationally negligent.

Paragraph 6.243 states that it is important to use areas of poorer quality agricultural land in preference to that of higher quality, but goes on to explain that 'quality' may be determined by more than the ALC grade. The 'economic and other benefits' such as infrastructure, fragmentation, and access, as well as the contribution land may make to wider ecosystem services and natural capital, are important considerations in relation to the effects of development on agricultural land. Natural capital is "*that part of nature which directly or indirectly underpins value to people, including ecosystems, species, freshwater, soils, minerals, the air and oceans, as well as natural process and function*".

The Government Policy 'A Green Future: Our 25 Year Plan to improve the Environment 2018' sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- . protect the best agricultural land
- . put a value on soils as part of our natural capital
- . manage soils in a sustainable way by 2030

Planning applications that would result in the loss of best and most versatile agricultural land will need to justify why the loss of the agricultural land is acceptable and also assess the impact of the loss of the agricultural land on the wider farming resource, natural capital, and ecosystem services.

If TWBC are following Government Guidelines (NPPF) and their own Policies it transpires that land at Tudeley should not be developed as it is Grade 2 and Grade 3 BMV and productive land. TWBC appears to have offered no justification for losing this finite resource which is not only invaluable in contributing to the UK being self-sufficient in food production but also important in providing other important 'ecosystem services' such as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution (EN 20 6.238). It is not a 'sustainable' option, nor does it put a value on soils as part of our natural capital.

Food Policy Experts are warning that with Brexit & Climate Change threatening UK food imports, self-sufficiency should be taken more seriously with the NFU asking for food security, which has been pushed into the spotlight by the pandemic, to be at the heart of wider government policies. The UK has an ideal temperate climate for growing food, but if our BMV land is covered in concrete this will be out of the question. In the mid-1980's the country produced 78% of our food today that figure is 64%; TWBC's plans for Capel will add to the decline.

The area to be developed at Tudeley in an average year has the potential to yield the following: 129 tonnes of blackcurrants, 265 tonnes of Bramley apples, 216 tonnes of pears, 207 tonnes of wheat, 155 tonnes of barley, 87 tonnes of oil seed rape and 175 tonnes of field beans. (*Sources: 'DEFRA Magic Maps' used to calculate the areas in cultivation (Tudeley 312 acres) and observation in the field for assessing local farming practices with information from 'assets.publishing-service.gov.uk' for average crop yields*).

In addition there is a very successful Livery yard providing a leisure service to local riders and access to the countryside via Toll Rides off-Road Trust (TROT).

If the land at Tudeley is continued to be farmed, this production could go on ad-infinitum and in essence contribute significantly to the self-sufficiency of the UK. It should be noted that the soil to the north of the railway line is particularly good and has produced exceptional crops of blackcurrants.

-

An alternative site south of the A21 at Castle Hill (also within the Capel Parish and proposed as an alternative site to Tudeley Garden Village) benefits from good existing infrastructure and is Grade 4 poor quality agricultural land but has been omitted from the PSLP. If however TWBC adhere to 'A Green Future: Our 25 Year Plan to improve the Environment 2018' and prioritise BMV, this site should be considered even though it is AONB.

TWBC are taking the easy, short-sighted option by using large areas of Green Belt, good quality, agricultural land to fulfil their housing requirement for the PSLP. This is not '**sustainable**' development contrary to the Government Policy requirements.

The allocated development site at Tudeley is unsound and should be removed from the PSLP

Flood Risk PSLP EN 25 The vast majority of the Tudeley Village site falls inside Flood Zone 1, with a small parcel of land to the north located in Flood Zone 2.6.276 of the PSLP states 'It is essential that new development across the borough does not increase flood risk, and that any new development proposed in areas that are vulnerable to flood risk 'build in' additional local capacity in terms of flood mitigation and provide 'betterment' where possible'.

6.278 The Council will therefore discourage inappropriate development in areas at known risk from flooding and, as the Local Planning Authority, will take account of flooding risks in all matters relating

to development management/control, including within the Local Plan and individual planning applications, in accordance with the NPPF.

Living on the edge of the Medway flood plain and bordering the Tudeley Garden Village I am justifiably concerned about the increase flood risk, not only to our home and those nearby, but also the wider area, the villages of East Peckham and Yalding, plus the Hartlake Road and Sherenden Road. Climate change and unpredictability of today's weather patterns make it difficult to know the extent of the flood mitigation required. It only needs winters like 2013 and 2020 when the Leigh Flood Barrier was at capacity and excess water flooded Tonbridge, the Hartlake Road and further down stream, plus additional run off from the vast area of impermeable tarmac/concrete from the Garden Village to cause extensive damage.

Stephen Baughen , Head of Planning refused planning of 6 B& B units at The Poacher Pub in July 2018 he said "it has not been demonstrated that the occupiers of the development would not be at risk from flooding or that the development would not increase flood risk elsewhere. Therefore the development is likely to result in a risk to human life from flooding and is contrary to policies EN18 of the Tunbridge Wells Borough Local Plan 2006 and Core Policy 5 of the TWB Core Strategy 2010, guidance in the National Planning Policy Framework 2018 and the Planning Practice Guidance." The application was considered to be fundamentally contrary to the provisions of the Development Plan and the NPPF and there were not considered to be any solutions to resolve this conflict.

One year later and a town with 2,800 homes is proposed within the same area. Even with mitigation measures how can this be 'sound' planning.

Inclusion of STR/SS 3 in the PSLP is therefore unsound.

Rural Landscape PLSP EN.184.118 of the PSLP states ' plans should contribute to, and enhance, the natural, built, and historic environment of the borough in accordance with the guidance set out within the NPPF. Policy should seek to ensure that the delivery of new development is balanced against the need to conserve and enhance the character and distinctiveness of the borough's natural and built environment, in terms of the intrinsic character and diversity of the landscape, its biodiversity, and heritage assets.'

The Landscape Character Assessment 2017 in chapter 5 says 'the description of the landscape character areas within the borough will assist in assessing whether development is acceptable in a particular location'.

The Tudeley site is in Character Area 13. The report for the area includes features and qualities considered to be of particular landscape and visual value to the character area including:

"4) Areas which retain a sense of the historic landscape, where the irregular and sinuous field boundaries are overlaid on more undulating slopes, divided by hedgerows and trees – particularly around the small hamlets of Tudeley and Capel.

5) The hamlets of Tudeley and Capel which retain strong vernacular character as well as views to the surrounding countryside."

Strategy also states "The Local Character Area should be considered in the context of the High Weald AONB, particularly the role the character area plays in the setting of the AONB. The valued features and qualities of the landscape should be conserved and enhanced.

- . Respect the vulnerability of the slopes rising up to the south to new developments/land use change. New developments can be highly visible over a wide area on these slopes and detract from the essential countryside character"

The Tudeley Village is located on a south slope of the River Medway and will be visible from the north slope up to 12 miles away as such it has a major adverse visual impact and will detract from the essential countryside character. It will also harm the scenic beauty and setting of the adjacent AONB.

Development in Tudeley will create irreparable harm to the landscape therefore the PSLP is unsound.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Strategic Housing and Economic Land Availability Assessment considered the Development site at Tudeley to be 'deliverable' and achievable because it is in 'single ownership'. This should be no justification to release Green Belt, BMV Agricultural Land, increase the risk of flooding in the area, destroy biodiversity, cause congestion on the roads, add to pollution in the vicinity and harm the countryside character because it is the 'easy option' to fulfil TWBC housing requirement. Development should be distributed throughout the borough, rather than placing 51% of the Local Plan housing need in Capel Parish.

It is an opportunity to create homes and take employment to more deprived areas of the borough, to re-vitalise Royal Tunbridge Wells with more accommodation and re-consider the more accessible, sustainable site at Castle Hill.

The Tudeley Village Site should be removed from the Local Plan and housing allocation reduced within the Parish of Capel in line with a small percentage increase of its present population. Site allocation in Capel should be decided with 'community engagement'.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Richard Ingham ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Richard Ingham ([REDACTED])
Comment ID	PSLP_1339
Response Date	04/06/21 15:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Richard Ingham
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Section 5 STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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At the time of the first consultation, there were a great number of objections raised and the TWBC have chosen to ignore all these comments and approved a plan that is fundamentally flawed. The proposal for 2800 new homes on green belt land is quite inappropriate. It will cause significant congestion and there are concerns over the potential for flooding. The infrastructure will not be sufficiently developed despite assurances given by the existing landowner/developers.

Question 6

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Although I acknowledge there is some need for housing, Tudeley is certainly not the right location and there are more suitable sites, such as the Castle Hill proposal, which has been give full consideration by TWBC.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The new housing development will only generate more transport movements, including car usage, which will have a detrimental impact on the environment.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Tanyia Ingham ()
Email Address	
Address	
Event Name	Pre-Submission Local Plan
Comment by	Tanyia Ingham ()
Comment ID	PSLP_1346
Response Date	04/06/21 16:00
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Tanyia Ingham
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Section 5 STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Having moved from central London over 30 years ago, I am dismayed that an area of green belt is going to be over developed by 2800 new houses. During this recent period of lockdown, never have green spaces been more important to our emotional and mental well being. TWBC's proposal to develop the land at Tudely has completely ignored the extensive opposition from both local residents and those living further afield upon whom it will impact.

Due to the local proximity of existing schools, the roads are currently grid locked at peak times and this new proposal will only exacerbate matters with no guarantee that the road network will be improved.

Question 6

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TWBC should consider alternative proposals such as utilising existing brownfield sites and give greater consideration to the Castle Hill proposal before committing such an extensive and insensitive development in Tudeley.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Katharine Jones [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Katharine Jones [REDACTED]
Comment ID	PSLP_1117
Response Date	03/06/21 16:09
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Katharine Jones
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Five Oak Green for 20 years. Our 3 children have been born here & we have a strong connection to the community.

I have concerns over the proposed development of Tudeley Village. I am concerned over the disproportionate amount of housing planned on Greenbelt land with no consideration having been given to the environment, the effect on the climate nor the infrastructure needed to name three. There is no consideration for affordable housing, so my 3 children & all those in the village currently will not have the option to live locally. They will financially be pushed out in favour of those being able to buy into the area from wealthier parts of the county/country or cities.

The plan shows a train station yet Network Rail have confirmed that this will simply not happen, there just isn't enough track space between Paddock Wood and Tonbridge to facilitate another station & the required need to slow down in order to stop at that station. This is misleading on the plan, so what else is there on the plan that is also a non-starter?

Building on such a scale will have a detrimental & irreversible affect on the plant and animal life. The air quality will be significantly worsened affecting not just the people but again plant and animal life and there will be devastating amount of light pollution from this vast number of houses.

We all saw the effect lockdown had on air quality and this planned development will see a huge permanent and irreversible change for the worse in our climate and our environment not only to us as residents but to the animal and plant population too. It is clear there has been no consideration towards our environment or the effect on climate change. TWBC have a duty to protect the bio-diversity of our borough. With this proposed development they have not.

This proposed development of houses will obviously increase the population, increase the number of cars on the road & increase the pollution. There is just one road through Five Oak Green & during lockdown it was evident how much quieter the traffic was. In the 20 years we have been here never was it quieter than during the lockdowns & now it is back to its usual peak. Even with just a small village school there is considerable traffic disruption outside the school at either end of the school day with additional cars parked along the road. This will only increase in number with the proposed development & planned secondary school and this is of huge concern to me that the safety of this has not been carefully considered. There is a lack of planning in the infrastructure here & it will have serious repercussions.

There is also the increase in flooding that this development will bring.

Five Oak Green will become part of a much larger urban sprawl linking Paddock Wood, East Capel, Five Oak Green, Tudeley Village & Tonbridge. There is no consideration to the loss of greenbelt and productive farmland. In a time when we're leaving the EU we need to be more reliable on our own land for our own produce. Our farmland needs to be used for the purpose it's intended - to provide crops - it should not be given up for poorly considered developments.

TWBC have not properly examined any alternative sites but have selected the easy option. This is lazy and not showing a duty of care to the current residents of the borough. Meanwhile Tunbridge Wells town centre is being ignored - there are dozens of empty shops and there is a lack of focus on regeneration here.

I strongly believe this development is not sustainable and is unsound.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sarah Jones [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Sarah Jones [REDACTED]
Comment ID	PSLP_1096
Response Date	04/06/21 12:30
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Sarah Jones
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Having lived in Tudeley for 27 years, I feel that I am well qualified to state my concerns about the proposed development and its lasting impact.

It is planned that the proposed development is built entirely on Green Belt. The purpose of Green Belt includes: 'To prevent neighbouring towns merging into one another'. The proposed Tudeley village would result in the merging of Tonbridge and Paddock Wood with no distinct countryside between the two towns. Another purpose of Green Belt is: 'To assist in safeguarding the countryside from encroachment'. The proposed development will destroy 170 hectares of beautiful and diverse countryside situated in Green Belt.

Green Belt should only be used for housing in exceptional circumstances when there is no alternative land available for development. TWBC has offered to take on housing allocations from other bordering BCs (Sevenoaks) which contradicts the fact that TWBC believes that there is a lack of non- Green Belt/AONB sites in TWBC available for housing and therefore the council believes exceptional circumstances preside in TWBC. Green Belt should only be used for housing development after all brownfield and non-Green Belt/AONB sites have been exhausted. There are several sites of significant size within TWBC which are not situated in Green Belt or AONB that have been identified and assessed within the SHELAA but have been rejected for development. Site Reference: 144, Horsmonden and Site Reference: DPC3 Blantyre House (both sites totalling approx. 130 hectares) were proposed but rejected. Both sites are outside of Green Belt and AONB and therefore should be utilised for housing prior to the site proposed for Tudeley village. In addition, it would be more logical to split the main new housing stock for the TWBC across 2 sites in the middle of the BC and not have it concentrated at one end of TWBC in area directly adjacent to another Borough Council's border.

Question 6

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or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Green Belt should only be used for housing development after all brownfield and non-Green Belt/AONB sites have been exhausted. There are 2 alternative sites to Tudeley that would be suitable for large housing developments within TWBC which are not situated in Green Belt or AONB. Both these sites have been identified and assessed within the SHELAA but have been rejected for development:

Blantyre House

Blantyre House prison and the surrounding land are owned by the government. The SHELAA only assessed Blantyre House prison buildings and its immediate surrounding land which is 11.40 hectares. The complete government owned site is approximately 79 hectares. This site was considered as reasonable alternative for a garden village but was rejected as it was thought to be too small, if the complete site had been considered this fact would not stand. In addition the Goudhurst Neighbourhood plan supported the development of the site. The site is 3 miles from Cranbrook. Cranbrook is a small town in TWBC with 2 secondary schools, shops and various other facilities. The nearest rail station is 3.8 miles from the site with links to London and Ashford International. Unlike the site proposed site for the Tudeley development, this site has an existing road system connecting it to both Cranbrook and the nearest rail station. There is currently an existing bus service that could serve this development. If this site were to be developed it would be utilising brownfield and derelict buildings and no Green Belt would be destroyed to either build houses or to better the existing road structure.

Horsemonden

Site ref: 144, Horsmonden, approx. 50 hectares (622 – 1,243 houses) was proposed for development. Despite not being in Green Belt or ANOB, this site was rejected for development for the following reason: 'This would be a very large scale strategic allocation that would be disproportionate to the size of the settlement with concern about the landscape and heritage'. The rationale behind this statement is not valid for a number of reasons; 1) TWBC is proposing a development in Tudeley consisting of 2800 houses which will destroy 170 hectares of Green Belt containing ancient woodland and listed buildings and is in close proximity to 3 historic sites; Tudeley church, Somerhill House and Hadlow Tower. 2) There are approximately 2600 residents in Horsmonden PC and 2500 residents in Capel PC which includes only around only 100 residents in Tudeley. Considering this, how can TWBC justify building 2800 houses in the village of Tudeley? This development would be majorly disproportionate to the size of the settlement. 3) Site ref:144 is attached to the Horsmonden therefore is an extension of an existing conurbation, therefore its development would not cause neighbouring towns merging into one another. 4) Site 144, unlike the proposed Tudeley development, will not be destroying additional Green Belt to create transport links as it will be able to utilise the existing road structure and bus service that currently serves Horsemonden.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Linda jorden [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Linda jorden [REDACTED]
Comment ID	PSLP_278
Response Date	23/05/21 08:19
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Linda Jorden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My father was born in Tudeley and lived there all his life, I am 61 and have lived in the parish most of my life, living in Five Oak Green Village for the past 25 years. My brother (59yrs) still lives in Tudeley as too does my mother in law.

Tudeley has always been a rural hamlet between Tonbridge and Paddock Wood, it used to be a Hop, Apple and Corn growing area with most of the farms being owned by the Goldsmid family (now Hadlow Estates) and tied farm worker cottages.

Over the years as agriculture has changed the farms have amalgamated and the whole area is now laid down to growing corn crops such as wheat, barley and rape.

The historic church of All Saints not only has the Chagall windows but dates back hundreds of years and attracts many tourists, along with the common wealth graves in the graveyard; not to mention my own family grave.

By building around the church the tranquility of the area and its historical lure will be lost for ever!

Views - The views from Tudeley across the Medway valley are stunning, the rolling farm land and wealden hills in the distance are stunning, by just building one house, these views will be lost forever.

Traffic - As a child I could cycle to Five Oak Green or Golden Green safely, however, the road has not been improved and it is like a death trap, it is scary in the car even with the 40 mile an hour speed limit, the volume of traffic is too great for the road, the drains are continually collapsing and it only takes one broken down car or set of roadworks to grid lock the whole area, especially on a work day.

My mother in law (living just off Hart Lake Road) and brother (living in the village) both struggle to get onto the main road and have to live their lives around the busy times by not using the road at this point.

Transport - There has never been a good bus service in the village, even last week I wanted to get to Tonbridge for 6pm without using the car, the last bus is 4.45pm!!! There are no pavements and cycling is out of the questions. I often walk across the fields using the many well used footpaths to get from Five Oak Green to either Tudeley or Tonbridge. Going to Paddock Wood means crossing the very fast Whetsed road which is too dangerous.

Flooding - Hartlake Road to the Poacher always floods, the water comes from both directions, from the Medway and also gushing down from the fields around the church and Crockhurst Street. The water also flows the other way down towards Alders Road, this is at a time when the fields can absorb the water along with the many ponds and ditches, what happens when these go?

My own house has nearly flooded twice with water coming into the garden, then in February 2020 it did flood, it was devastating, we were homeless for six months, lost so many possessions and although we had good insurance, we will never view the house, our home, in the same way again. Why build on flood plains?

Sewerage - Already the pipe between Paddock Wood and Tonbridge carrying all the sewerage cannot cope and everytime it rains hard the pump fails in both Five Oak Green and at the pumping station in

Tudeley. The road in Five Oak Green becomes blocked with pumping lorries, we have to have traffic lights and endure lorries running their engines 24 hours a day to pump the waste, its an environmental disaster and keeps us awake at night.

Phones - Mobile phones do not work in the area, the singal is awful no matter what provider you are with, smart meters the same.

Water - Where will the water come from for all these new houses? there are no new reserviors and no work has been carried out to the ones which do exist?

Land - The land is good quality soil which for centuries has grown the food to feed the nation, nowadays more than ever we need to keep hold of our land and grow sustainable crops to feed us all. Why build on good land when there are so many empty factories, shops and offices around. Once you start to build on virgin land there is no putting it back to how it was.

Nature - The whole area has a great diversity of wildlife and wonderful wild flowers, bluebell woods, primroses, orchids, badgers, hedgehogs, deer and foxes to name but a few. Where will the wildlife go? the flowers will be lost forever, what sort of area will my grandchild see?

Quarrying - There are quarries planned along the Medway linking up with those already there and on into Tonbridge. The whole area will become disused quarry lakes and houses with no land between.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are many brown field sites in the borough, TWBC appear to feel these are too expensive to use, while building on virgin farm land, making land owners richer, is the easy option.

The cinema site in the town is perfect for housing, the victoria centre is empty of shops, why not move the handful of remaining shops into the empty shops in the precinct and use this site for housing? Not to mention all the empty factories and offices around the borough.

The plan is an environmental disaster!

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Delwyn Kay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Delwyn Kay [REDACTED]
Comment ID	PSLP_1231
Response Date	04/06/21 11:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Delwyn Kay
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My family and I have lived in East Peckham for nearly 19 years now, my school aged children attend local schools, they have to travel for secondary school (as do all children that age from our village). I work in mental health NHS services that require me to travel to Tunbridge Wells to my team base and around South West Kent to provide community services to local residents.

I am concerned about the prospect of this proposed massive development in East Capel and the demand that will place on our local services (GP, schools - esp secondary schools, roads, NHS). There is traffic congestion around this area now, esp at peak hours and even despite the covid restrictions currently in place. If this development goes ahead this will make it very difficult for villagers in East Peckham to travel to their work and schools as the congestions points will be on small lanes. Additionally the plan funnels traffic into certain limited routes that will make trip times and distances excessive for us here in East Peckham, easily doubling times and inconvenience and making it harder for us to travel locally into Paddock Wood, Tonbridge, Tunbridge Wells and to access the A21. There are plans to block the route for us to South Tonbridge and the A21, where the majority of secondary schools for our girls are. The congestion will add to local pollution and inconvenience for current residents. Might I suggest the proposal of blocking roads such as Hartlake to solve congestion for current residents is a poor and simplistic solution, compared to changing the housing plan to provide smaller sympathetic housing developments, in a wider range of places that can be integrated into villages and towns and not place undue demand on the local facilities of neighbouring councils, at the expense of local council tax paying residents of Tonbridge and Malling.

Using green belt and farming land for the purposes of housing is not in keeping with local residents wishes and the national and local plans for that type of land use. Using current town and village edges and brown field should be the first and main housing option.

It is already difficult to get a GP appointment at our local surgery in Paddock Wood and for our children to obtain places and to travel to Tonbridge comp and grammar secondary schools. This will only worsen for our village if there is a development of thousands of houses between our village and our GP surgery and also the schools. This will therefore restrict access of current local residents to facilities if the new development goes ahead. Local services need to be able to provide facilities to its current residents and this will be impeded if this proposed plan goes ahead in its current state. The idea that more schools and GPs will be provided is unlikely, similar developments in other local areas have not been able to attract GPs and the demand has continued on the existing surgeries (such as at West Malling) and that schools are not built for many years down the track, affecting current residents in the meantime.

This area is prone to flooding and the degree of flooding will only increase into East Peckham with the degree of building work that is proposed for East Capel. Given global warming will only increase wet weather and the prospect of flooding here, it is unacceptable to increase this risk to East Peckham by

building such a large development in at this site. We all understand the need for housing, but not at the expense of flooding downstream to other neighbours.

There will be increased travel to Paddock Wood for trains, GP and schooling in addition to the increase demands on Tonbridge. This is a small town, that is already seeing increased demand on facilities with its current in progress building works. This town is not resourced to have even thousands more families trying to access facilities. The pollution and congestion for local residents and small surrounding villages will be bad.

This plan will change the nature of the villages and towns in its vicinity by utterly changing Capel village to a town, Tudely hamlet to a town and soon enough linking Paddock Wood to Tonbridge and utterly changing this rural area into one large residential town.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_62

Comment

Consultee	Charlie Keeling [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Charlie Keeling [REDACTED]
Comment ID	PSLP_1055
Response Date	03/06/21 09:02
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1044_C_Keeling_SI.docx

Data inputter to enter their initials here AT

Question 1

Respondent's Name and/or Organisation Charlie Keeling

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: This representation has been input against Policies STR/SS1 & STR/SS3 – see Comment Numbers PSLP_1044 and PSLP_1055]

[TWBC: Representation attached as supplementary information as tables used by respondent]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Executive Summary

There is much detail laid out in this submission objecting to the development of the two so-called Strategic Sites at Tudeley Garden Village and East Capel, as part of Paddock Wood. To be helpful I have summarised the major points, against the listed Policies in the Plan:

- . **Policy STR2 – Place Shaping** - Forcing almost 50% of the Borough's Housing Needs on to 2% of the Borough's Population, who are represented by one, out of 48, Councillors. Little or no account taken of the severe Infrastructure impacts on the two neighbouring Councils Tonbridge & Malling (TMBC) and Maidstone (MDC).
- . **Policy STR3 – Brownfield** - an overly negative approach to the locations of the sites and their ability to be developed into sustainable housing developments, given their existing land use and infrastructure.
- . **Policy STR5 - Infrastructure and Connectivity** – I have focused on Schooling, Medical Facilities and Provision of (basic) Utilities. Transport Infrastructure comments are in STR6 – Transport and Parking
- . **Policy STR6 - Transport and Parking** – After setting the context I have set out the current road infrastructure status and issues, the proposed mitigations in the PSLP to deal with them, and finally, comments on the proposed mitigations.
- . **Policy STR9 - Green Belt** – A general statement regarding the Green Belt, with reference to the Site Allocations Plan in 2016, with comments from the Inspector who reviewed it
- . **Policy STR/SS1 - Strategy for Paddock Wood and East Capel** – I have put in two submissions one for STR/SS1 and one for STR/SS3
- . **Policy STR/SS3 - Strategy for Tudeley Village** - I have put in two submissions one for STR/SS1 and one for STR/SS3
- . **Policy TP1 - Transport Assessments etc** – for such important Strategic Sites the level of Transport Assessments is woefully inadequate. They are based on over-optimistic, i.e. too small a number, of trips, modal shifts are unrealistic, very little, if any, evidence of KCC's input,

agreement or approval, and flagrant disregard of the impact of TMBC and MBC's own plans and how that factors into the Transport Assessments.

More Detailed Information

Policy STR2 – Place Shaping

The original Issues & Options SA identified 6 growth strategies ("GS"), none of which mentioned Tudeley/Capel specifically as a site for a potential garden town. GS5 was described as "New freestanding garden settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough."

The preferred option at this point was "the A21 Growth Corridor", where large scale investment in Infrastructure, dualling the A21, had already taken place by KCC.

Then, just prior to the Regulation 18 Consultations GS5 was adopted by TWBC with Strategic Sites at Paddock Wood/East Capel, and Tudeley Garden Village, as the nominated sites. This was a real "rabbit out of the hat"!

Please see the table below as indicators of why the Place Shaping was, and remains, wrong.

Parish/Ward

% of Population of TWBC

% of Housing Allocation

Number of Councillors

Capel PC

2,400 – 2%

4,200 – 45%

1

Paddock Wood TC

4,100 – 21%

2,400 – 21%

3 (+1 absent)

Total for Strategic Sites

6,500 – 23%

6,600 – 66%

4

Rest of TWBC

112,250 – 77%

2,747 – 34%

44

Total for TWBC

118,750

9,347

48

I feel this Table represents a very unfair allocation of housing needs to one area of the Borough, and one that borders on Tonbridge & Malling Borough Council (TMBC). This analysis results in:

- . 45% of the housing need being imposed on 2% of the Borough's population.
- . 66% of the housing need being imposed on 21% of the Borough's population.
- . These wards are represented at the "Council Chamber" by 9% of the TWBC Councillors
- . The major impact of these proposed developments will be felt in Paddock Wood (part of TWBC) and TMBC as these are the two centres which attract residents and traffic for:
 - . Commuting
 - . Shopping
 - . Schools
 - . Medical Facilities
- . Paddock Wood already has a significant level of new housing developments in progress. They are already causing issues with Traffic Congestion, Flooding, Sewage etc. And they don't meet affordability targets.
- . Similarly, Tudeley and East Capel suffer from Traffic Congestion, Flooding and Sewage.
- . TMBC are having a massive infrastructure problem and cost dumped on their doorstep. TWBC get the Council Tax, TMBC get the hassle and cost!

Finally, the vast majority of the development proposed in for the two strategic sites is:

- . Metropolitan Green Belt – with good classification of the quality of the agricultural land. To build over this land would be a travesty, reducing the country's ability to produce fruit and other arable produce, and creating settlements which will have an adverse impact on the landscape and environmental aspects of this area of Kent.
- . Flooding – a lot of the proposed development areas for the two Strategic Sites are either officially on the Flood Plain or have been subject to severe flooding episodes over the relatively recent past. I would have thought it likely that Home Insurance providers could adopt an aggressive, or expensive, attitude to providing cover in these circumstances. As a result, potential developers will also react negatively to this challenge.

In summary, this Local Plan is so skewed to development in a currently tranquil, beautiful, and highly food-productive, area, in the Green Belt, subject to flooding, with massive infrastructure issues, and on the doorstep of the neighbouring Borough Council who will end up bearing the brunt of the issues this will cause.

Policy STR3 - Brownfield

The reviews that TWBC have carried out on Brownfield sites appear to have adopted an overly negative approach to the locations of the sites and their ability to be developed into sustainable housing developments, given their existing land use and infrastructure.

I am aware that Save Capel carried out an extensive analysis of potential Brownfield sites, ahead of the Regulation 18 Consultations, which demonstrated that the volume of houses being proposed in Capel parish could be easily accommodated by Brownfield developments. Sadly, as with the majority of other Regulation 18 comments/challenges TWBC chose to ignore them.

Probably the main opportunity for a Brownfield development exists at the former Blantyre House Prison site. It is a large site, not in the AONB or Green Belt, with Infrastructure services already installed. It's rejection by TWBC on the basis of there only being minor roads, and therefore significant investment would be required for transport infrastructure, pale into insignificance compared to the transport infrastructure of the Tudeley and Paddock Wood/East Capel sites (see comments below on other Policies relating to this topic.

Whilst not a Brownfield development issue, one of particular relevance from an alternative site's perspective, is the Castle Hill Developments proposal to create 1,600+ homes which are in the favoured "A21 Corridor" option. Whilst the proposed development is in the AONB it has much better potential from sustainability and infrastructure perspectives. This was rejected "out of hand" with little or no analysis by TWBC.

Additionally, TWBC have recently approved a very large Commercial Development at Kingstanding, which was also in the same AONB area. This has great employment potential, but leads one to wonder why a Commercial Development is acceptable in the AONB but a respectful (to Sustainability) Housing Development isn't?

Policy STR5 - Infrastructure and Connectivity

Introduction

The proposed developments at Tudeley Village and East Capel (now, apparently part of Paddock Wood) will bring significant pressure and issues in other Infrastructure areas, especially:

- . Schooling
- . Medical Facilities
- . Provision of (basic) Utilities

Before considering each of these in turn, please review the following new population projections as context. These are based on an assumption of 2.26 people per household (a usual UK Metric) and using the metric of 0.285 children per household as part of that:

Projected Population Growth

Capel

Tudeley Village

Capel Parish

Adults

5,500

4,500

10,000

Children

2,200

1,800

4,000

Total

7,700

6,300

14,000

Projected Number of Extra Vehicles

3,500

2,500

6,000

This swamps the existing population of Capel Parish which was 2,400 at the previous census. So where will all these extra go for schooling, medical facilities and how and when will basic utilities be delivered to this staggering number of people.

Schooling

For the 1,800 children from Tudeley, the plans to meet the educational needs of 2,200 children from East Capel seem inadequate.

Proposals in the Plan, including Paddock Wood are:

- . New secondary school to serve Tudeley Village, potentially up to 1,000 pupils.
- . Expansion of Capel Primary School by 1FE.
- . Extension of Mascall's Academy by 1FE from 2021.
- . Two new Primary Schools in Paddock Wood, providing 4FE.

The Tudeley secondary school of perhaps 1,000 pupils and expansion of the small Capel primary school will be woefully inadequate, and particularly so if both development plans proceed. The new secondary school is not planned to be built until Phase 4, or after 1,900 houses have been built!

The remaining children totalling up to perhaps 2,000 will need to be driven or bussed daily to either Tonbridge or Tunbridge Wells (at least 50 or 60 buses twice or more each day). The planned provision for nurseries is similarly inadequate.

There is an incredibly strong, existing, demand for places in the good local schools in Tonbridge and Tunbridge Wells. It is naïve to think that some 2,000 pupils will somehow be absorbed in the existing schools in these two towns; in practice many pupils will have to be driven or bussed far away to Maidstone or Sevenoaks, all adding to traffic and congestion. In reality, another two or possibly three large schools will need to be built by KCC if both projects proceed. The key issue is when the schools will be built and ready to take pupils.

There will inevitably be children with special needs, the cost burden of which will fall on KCC and TWBC. In practice, TWBC will simply be imposing these education costs elsewhere, displacing the education of children in other Boroughs and creating congestion, particularly in Tonbridge and Tunbridge Wells.

The plans make no assessment of these education and congestion costs or whether KCC can or will agree to fund these new schools and so are unsound.

Medical Facilities

Regardless of whether one or other or both projects proceed, the number of new residents will necessitate new healthcare facilities, the plans envisage one new GP surgery which will be particularly busy and will require some 6 to 8 doctors plus support staff. If both proceed, there will be 14,000 new residents ultimately requiring these healthcare services.

There will also be considerable extra pressure and costs imposed on Pembury Hospital which is already strained. As stated in the plan, a significant number of the adults are likely to be over 65 and elderly, some with special needs and as they age, increasing demands will be made on local health services. The same will apply to the up to 4,000 children. All of this will impose significant additional and increasing social services costs on TWBC and medical provision costs on the local Health Trust.

Additionally, there is little information in the Plan about the timing of the creation of the new medical facility. Until that is planned, approved, and developed, whatever proportion of the 14,000 new residents are living there before then will need to access medical facilities elsewhere. This will probably fall on to Tonbridge where medical facilities are already stretched. **Another example of TWBC passing their problem on to someone else, TMBC in this case.**

The plans do not properly address these issues nor quantify these costs so are unsound, inadequate and will impose potentially large contingent costs on TWBC.

Basic Utilities

Electricity, Gas and Communications

As no new houses can be connected to the gas grid from 2025, the two developments will need to be powered entirely by electricity. This will require extensive investment in major HV transmission lines and stepdown transformers, particularly as new EV charging infrastructure will be required eventually for some 6,000 cars given that petrol and diesel cars will be phased out after 2030. All the cables will need to be buried. This is a major engineering task in addition to road building, road widening, school building, GP surgery, sports facilities etc. The Tudeley plan budgets £11.5m and the Paddock Wood/Capel plan budgets £10.8m solely for electricity connections and diversions with no discussion about grid infrastructure or who pays for these or how construction will be phased. In the experience of experts, we have consulted, the cost of the grid infrastructure and substations will be many £millions and will not be installed for several years. FTTH broadband will be relatively more straight forward to install.

The plan is unclear on this important aspect and so is unsound as a result.

Waste Disposal

The disposal of waste from up to 6,250 new homes will require TWBC and KCC to invest in more waste disposal facilities. This will create yet more heavy vehicle movements on already congested roads and add to the waste already trucked away from North Farm. These additional costs do not seem to be factored into the plans and will be a charge on the annual rates which would rise slowly over time to a total of some £10m once all 6,250 homes had been built.

In Summary

The PSLP documentation is woefully inadequate on any of these topics. The views and agreement of KCC are absent from these Plans. There has been no visible Master Planning for Utilities for the Tudeley Village proposal, and what is there for Schooling and Medical Facilities falls very short of the mark of a justified, fully costed and risk-managed Plan. **For all of these reasons the Plan is unsound.**

Policy STR6 - Transport and Parking

Context

Capel Parish's geography and existing transport infrastructure heavily-constrains planning sustainable development for the future. This is recognised in many parts of the PSLP ('the Plan') and supporting evidence. The Plan and its 'key diagram' (Appendix A of the Plan) make it very clear.

- . The only Trunk Road in Capel Parish is the A21 through the west of the parish serving London/M25 to Hastings, running east of Tunbridge Wells through the Borough.
- . There are two other "A" class roads relative to Capel Parish: a) A26 Tonbridge to near Maidstone, borders Capel Parish at Tonbridge to the west & follows the river Medway valley north east partly bordering Capel. b) A228 (northwest/southeast through Capel Parish) links M2 & M20 London-Dover motorways & the North Medway towns to West Malling, Paddock Wood, A21 & Tunbridge Wells. A major highway traversing Capel.
- . There is only one railway line in the Parish, but no stations. The two nearest stations are Tonbridge serving London/Hastings, London/Dover/Ramsgate, Tonbridge/Redhill. Paddock Wood is on the London/Dover line with an irregular country line between Paddock Wood/Maidstone West.
- . Bus services are 'patchy and infrequent in rural areas' (and almost non-existent after 7pm).

- . The local road network has severe constraints; Much of the infrastructure is rural and narrow and therefore unsuitable for HGVs. The impact of large and many foreign HGVs, on communities in the area, presents a major, existing and continuing challenge.
- . New quarrying will create 120 HGV movements per day through the access point in Capel onto A228 and impact all roads in the area.
- . Capel Parish's only "B" road B2017 links Paddock Wood to Tonbridge via Five Oak Green & Tudeley. There are also a number of Kent County Council designated "country lanes" used as "rat runs" with HGV traffic, many foreign.
- . There are a number of industrial estates, haulage and distribution yards that have evolved on old farmsteads throughout the area using country lanes.
- . All "main" roads are heavily trafficked, especially in the morning and evening peak periods.
- . The A228 in Capel is now recorded as "the busiest road" in the whole of Tunbridge Wells Borough by the TWBC traffic consultants.

This is the context against which all new development put forward in the Plan should be considered. Save Capel (SC) has reviewed the large number of references to the subject of transport in the Plan and supporting documents and have appointed expert advisors to assist us. 'Mitigation' of the significant impacts, particularly of increased traffic, is offered by Tunbridge Wells Borough Council (TWBC) in the context of developing the Strategic Sites (SS) at Tudeley Village and East Capel/Paddock Wood.

SC's review shows that the treatment of transport in the Plan is inconsistent and the result is unsustainable making the Plan itself unsound.

Impact of the Plan on travel at peak periods on the existing transport and roads infrastructure

Motion Consulting have also submitted their report in the evidence base for Regulation 19. This is based on the Traffic Modelling in the Plan and also Motion's own knowledge base of similar proposed developments.

In summary, the impacts are as follows:

Class of Road

Including

Roads Detail

RAG

"A" Roads

A21

ALL flows will increase due to traffic joining/leaving at the Tonbridge (Vauxhall) Roundabout to/from the East. This road was dualled between Tonbridge & Pembury in 2018 but suffers severe bottlenecks at the southern end, Kippings Cross where the dualled A21 ends. Longer delays expected with increases in housing from Paddock Wood.

Yellow

Circle

A26

Unacceptable increases in traffic from the South/East at Somerhill A26/B2017 Roundabout and on to Vauxhall A21 Roundabout to the West and into the Tonbridge Industrial Estate to the East. Long delays.

Red

Circle

A228 Colts Hill

Very high increased traffic flows at all junctions joining the A228. A228 at Colts Hill has been the subject of discussions about a bypass for 40+ years. **The Alders Road/Crittenden Road junction is a notorious accident black spot.**

Red

Circle

A228 Beltring

B2160 roundabout junction

Queuing traffic most of the day at the 3-spur roundabout. Main junction to reach Paddock Wood industrial areas.

4th spur is access to The Hop Farm – huge park & events centre 000s of vehicles at some events.

Yellow

Circle

“B” Road

B2017,

Badsell Road/ Five Oak Green Road/ Tudeley Road

B2017 (cont)

A typical old “B” road. The only direct route west from Paddock Wood, at the junction of the B2160, to Tonbridge & A21. Running through East Capel to A228 then Five Oak Green, Tudeley & A26/A21 Tonbridge. Overloaded, no HGV restrictions or traffic calming at all. The B2017 is already very busy at peak times and has 3 accident black spots.

Due to long delays at A228/A264 Pembury, this is used as main route to Tonbridge & A21 heading Northwest. Commuter traffic uses this road to egress many other villages east of Paddock Wood & as far south as Hastings via other rat-runs to avoid delays on A21 south of Kippings Cross.

The B2017 cannot take any more traffic.

Red

Circle

Minor Road

Crittenden Road/ Alders Road

A very narrow, winding country lane used as a rat-run linking Matfield area & further east & south to B2017 at Crockhurst Street then on to Tonbridge & A21. Crosses A228 at Colts Hill. Used by traffic avoiding the A21 long delays at Kippings Cross especially during commuter times and weekends.

Red

Circle

Minor Road

Hartlake Road (part of which is TWBC, and part of which is TMBC)

In parts a narrow, winding road, used as a through route & rat run to avoid delays at Tonbridge and/or A228 which are severe at peak times. Often cars parked by the bridge over the Medway for fishermen and ramblers.

Red

Circle

Sherenden Road

A very narrow & twisting lane running from Hartlake Road near the very popular Poacher & Partridge pub/restaurant, past Bank Farm Stables and through to the B2017 Five Oak Green Road. Blind junction on B2017. This will form part of the proposed Tudeley Garden Village TGV.

Yellow

Circle

Sychem Lane

A country road, very narrow and winding, linking Five Oak Green to the hamlets of Redwood Park, old Chapel & Alders Road. If the Five Oak Green bypass is built this road will be closed to through traffic. **Unacceptable to local residents.**

Red

Circle

Whetsted Road

Branches off to the North East at centre of Five Oak Green to link up with the A228, midway between B2017 & B2160 roundabouts. Narrow and winding residential road, no pavements, a narrow bridge on a blind bend. Rat-run A228/ Tonbridge to avoid Colts Hill & Pembury delays and B2017/A228 roundabout delays. The reopening quarry traffic (est.120 vehicle movements per day) will egress the A228/Whetsted Road junction. **Already an accident black spot.**

Red

Circle

[TWBC: Respondent had used red and yellow circles in above table - TWBC has replaced these with words for formatting purposes]

Mitigations as per the PSLP

The PSLP contains a number of mitigations based on Traffic Modelling carried out by two Consultants, SCANTEC and SWECO. According to our own independent Traffic Consultants 'Motion' the scenarios, and bases of the modelling would be best described "very optimistic" in terms of both numbers of journeys and mode of transport. The detail is on the Motion Report which attached to this report.

As a result, Save Capel believes that there has been a significant under-assessment of the traffic implications of the PSLP as currently drafted.

Class of Road

Including

PSLP Proposals

“A” Roads

A21

Junction re-alignment at Kippings Cross. No other mitigations planned to relate to the PSLP. There are some changes proposed outside of the PSLP regarding the new Business Park bordering North Farm Industrial Estate. This development was approved by TWBC and KCC (March 2021) despite it being in the AONB.

A26

Proposals to improve traffic flows at the junction of the A26/B2017 just below the Somerhill Schools entrance, which is currently a major disruption during peak hours. A widening of the B2017 between this roundabout & new roundabout at TGV Hartlake Road. Two lanes each way + cycleways against the existing single carriageway each way.

A228 – Colts Hill northern section

Proposal to create an “offline by-pass” to alleviate the current accident black spot at junction of Alders Road/Crittenden Road with the A228. Details regarding the A228 are not clear enough due to issues with KCC funding and impact of Tudeley Garden Village. If TGV is built then Five Oak Green bypass will be included. The southern section of Colts Hill is excluded from PSLP.

A228 – Colts Hill

Roundabout to access proposed Five Oak Green bypass which is dependent upon TGV – see later..

A228 General

There are various small schemes along A228 to support the East Capel/Paddock Wood Garden Village. Crossing points for pedestrians and cyclists are not clearly defined and are of a safety concern.

A228/B2017 Junction

3 new estates under construction in Paddock Wood (approx. 1,650 homes) outside of the PSLP, have included £870k for junction improvements to include 3 traffic lanes on the whole roundabout.

“B” Road

B2017, including Five Oak Green Road/Tudeley Road/Badsell Road

There is a proposal to build a “Five Oak Green By-Pass” to relieve the volume of traffic on the B2017 through Five Oak Green. This would be a new road from the proposed northern section of A228 Colts Hill bypass (close to Alders Road) to a junction with B2017 by the existing Capel Primary school and proposed secondary schools.

B2017/A26

There is the previously mentioned road widening proposal at the junction of the B2017 and the A26 near to the Somerhill Schools

B2017/B2160

Paddock Wood

Improved B2017 Badsell Road/B2160 Maidstone Road signalised junction near to Paddock Wood – (already started).

Minor Roads

Hartlake Road (part of which is in TWBC, and part of which is in TMBC)

Create a roundabout at the Hartlake Road/B2017 junction for TGV. Furthermore, TWBC proposes Hartlake Road be closed to through traffic where the road crosses the River Medway. Currently the road continues on to Golden Green and then to Tonbridge and East Peckham. As a result of the proposed closure of Hartlake Road the current two-way traffic flow would terminate at the bridge over the River Medway.

Sherenden Road

No mitigations known. Will be part of Tudeley Garden Village & no plans announced yet.

Alders Road

The proposed Five Oak Green Bypass is to alleviate the traffic flows on Alders Road which are currently high and will become more significant even before the Local Plan proposals go ahead due to developments currently underway in Matfield, Horsmonden & Paddock Wood. However, the PSLP notes that the Five Oak Green bypass will not proceed without TGV and so there could be no relief for Alders Road/Crittenden Lane.

There are various proposals for the design of A228/Alders Road junction, but none has yet been agreed as KCC may sponsor the whole Colts Hill bypass if they can secure funding after 2025, although TWBC & then KCC have been saying this for the last 40yrs. Residents have no confidence this will be within the timescales suggested.

Sychem Lane

Will be closed to vehicular access if TGV and Five Oak Green bypass are built, but will allow pedestrians, cyclists, and horse riders to cross the new bypass, although no mention of how.

Whetsted Road, Five Oak Green

A228 Maidstone Road/old Whetsted junction improvements.

A228/B2160 Hop Farm roundabout

Improved A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout

Comments on Mitigations

Class of Road

Including

Likely Impact & Comments

"A" Roads

A21

Kippings Cross improvement scheme

The main factor that will determine if this goes ahead is the proposed dualling of the Kippings Cross to Lamberhurst section of the A21 which has already been designed by Highways England and mentioned in parliament as a potential for the "next" round of major highways works by HE.

However, those proposals will not be decided until 2023/4.

This is the main arterial route south through part of Capel Parish and dualling of lower section of A21 to Lamberhurst & A262 may reduce some rat-running through B2017. However, roundabout junction improvements alone are unlikely to relieve rat-running in Capel as many are to avoid A21 queues north/south. New estates under construction in Paddock Wood and Matfield are likely to benefit.

A26/B2017

Roundabout

Significant remodelling of the whole roundabout and junction would be required with potential land grab. The disruption to traffic in the whole Tonbridge area and impact on Five Oak Green and Paddock Wood would be immense and this is not accounted for in the PSLP. There are no alternative routes in this area as they are already being overloaded. One alternate could have been Hartlake Road, but the PSLP is closing this to through traffic.

The impact on the very successful Schools at Somerhill will be significant, but as the Schools are effectively tenants of the Hadlow Estates Developer it is unlikely that they will raise objections.

A228

Colts Hill Bypass – after 40 years with no approved proposals what is KCC's views on the proposed mini-Bypass? It makes little sense to dig half a hole from both a cost and disruption basis!

Why build half a road and introduce more very difficult and dangerous junctions halfway up a hill and keep the narrow bends to the north of Alders Road used by hundreds of HGVs daily? It is just moving the accidents elsewhere; it does not solve the problems of Colts Hill. **Very Unsound.**

"B" Road

B2017, including Five Oak Green Road /Tudeley Road/Badsell Road

The proposed "Five Oak Green Bypass" has not been subject to any discussions between TWBC and the two current landowners who only found out about this proposal via social media. Neither landowner is interested in selling and therefore this proposal would need to go through a CPO process.

The bypass will cross through ancient woodland, close off Sychem Lane to traffic & isolate old Capel, Alders & Redwood Park from their village and amenities in Five Oak Green.

The Five Oak Green bypass junction with B2017 is outside of 2 schools (the existing Capel Primary School, and the proposed Tudeley Secondary School) with a potential of more than 2,000 attendees (staff & pupils).

The planners are supposed to be safety focused and I fail to see how a major new road with a junction outside 2 schools is considered a safe approach?

The new bypass will be loaded with HGVs egressing the M25/A21/Paddock Wood as it will be much quicker and use less fuel than travelling through the A21/A228 Colts Hill & Pembury to Paddock Wood & East Peckham industrial areas.

Pollution outside the schools is a major concern.

The consultant's Plans & Maps in the PSLP have incorrect speed limits shown on them for Five Oak Green and this demonstrates that this was a rushed desk top study and none of the planners actually visited Capel. One section shows Capel as being just Alders Road and it shows a picture of a "Capel" sign which is actually the hamlet of old Capel along Alders Road and **NOT** the parish sign at all.

This plan has not been thought through properly and the impact on the whole area not considered in its entirety. The attention to detail is abysmal and the whole project is **Unsafe & Unsound**.

B2017 Hartlake Road Tudeley

The proposal to create a new roundabout where the B2017 meets Hartlake Road in Tudeley also suffers from an inadequacy of space to create a roundabout.

The improvements here will depend on TGV being approved, but then we will have all this traffic hitting this roundabout whilst thousands of residents and children are commuting to work and schools.

Unsafe and Unsound.

B2017 from A26 to Hartlake Road

The previously mentioned road widening proposal from the junction of the B2017 and the A26 near to the schools at Somerhill and up to TGV will entice drivers to speed past the 3 schools' entrance at Somerhill and being on a hill drivers will take longer to stop potentially creating mayhem on the road.

A228/B2017 Roundabout

Improvements

The detail in a previously approved planning application regarding the proposed increased capacity at A228 Maidstone Road/B2017 Badsell Road (Colts Hill/Dampiers Corner) roundabout suggest 3 lanes will be used around the roundabout.

In practical terms, given we have hundreds of large and often foreign HGVs along this route daily, some pulling very large trailers, it is unlikely to improve the flow through the roundabout.

It should also be noted that the flow is from all 4 spurs and not just 1 or 2 interrupted occasionally by the others. New estates in the PSLP will create huge queues at all spurs most of the day here.

It is also of concern that the Grade II 16C Listed Mill House standing right by the roundabout will suffer serious pollution issues and the additional traffic will affect all properties next to the roundabout regarding health issues and noise pollution.

A228/B2160 Beltring

Little detail is provided regarding the proposed improvements to the B2017 Badsell Road/B2160 Maidstone Road signalised junction near to Paddock Wood but being "signalised" will create huge queues on all arms of this very busy junction.

Minor Roads

Hartlake Road (part of which is in TWBC, and part of which is in TMBC)

The proposal is to create a roundabout (as above) where Hartlake Road meets the B2017, however TWBC also propose that Hartlake Road be closed to through traffic, where the road crosses the River Medway. Currently the road continues on to Golden Green and then to Tonbridge or East Peckham. As a result of the proposed closure of Hartlake Road the current two-way traffic flow would terminate at the newly rebuilt bridge over the River Medway.

This is a rather badly thought through scheme. Planners **MUST** consider that we have a main railway line and major river running through the valley and crossings for either are very limited. By closing Hartlake road the traffic is forced to go through Tonbridge where another 6,400 homes are planned in the same period, as is a major development in Maidstone Borough Council, alongside 2,800 in Tudeley and 8,500 in Paddock Wood. **The roads are already clogged in Tonbridge due to the restricted crossing points and the whole idea of closing any crossing point is unsound.**

Sherenden Road

No mitigations proposed or plans revealed.

The Masterplanning is still unannounced.

Alders Road

The Five Oak Green Bypass is proposed to alleviate the traffic flows on this road (as well as B2017) which are currently high and will become more significant if the Local Plan proposals go ahead without inclusion of major road improvements in the area. See previous comments about the A228 Colts Hill Bypass

Sychem Lane

Closing Sychem Lane will isolate part of Capel Parish and the idea of horse riders, cyclists and pedestrians having to cross a fast bypass without a bridge is **Unsafe and Unsound.**

Whetsted Road

Improved A228 Maidstone Road/Whetsted Road priority junction. Currently, the quarrying operations here are suspended. When they re-open, as well as the increased traffic caused by the East Capel proposals, this junction will need to service 120 Quarry HGV movements per day. The junction is on a very fast bend and is already an accident black spot.

Conclusions

- 1 The impact of the sheer magnitude of additional traffic movements, as a result of building up to 5,000 new houses in Capel Parish, between Tudeley Village and East Capel, has been modelled

using very optimistic scenarios and assumptions with regard to volumes of traffic and modes of transport.

- 2 The assumptions take no account of the Local Plans being developed by neighbouring Boroughs where at least 12,000 new homes will be built. The impact of these new estates will affect the whole area.
- 3 None of the existing roads have the capacity or physical ability to absorb the increased traffic movements.
- 4 The mitigations proposed are either inadequate, unlikely to be deliverable or otherwise inappropriate, therefore they are **Unsafe and Unsound**.
- 5 The construction of any transport mitigations will in themselves be considerably disruptive, and from a timing perspective likely to be out of synchronisation with the house building programme.
- 6 Apart from minimal information about the views of KCC there are no agreed, even in outline, proposals that have been made available before the Regulation 19 Consultations.
- 7 For Tudeley Garden Village there is no evidence base that key Transport, Flooding, Other Infrastructure, Landscape or Biodiversity issues have been considered, or proposals made in the Masterplanning of TGV.

In summary, there are too many gaps in the information provided to take the PSLP to the next stage of the process. Unless these gaps can be adequately filled, through the Regulation 19 process, **we would suggest that PSLP is not sustainable and unsound.**

How will KCC/TWBC handle all of these highways works whilst the building of 8,500 homes on several sites is ongoing and the current residents are trying to go about their normal lives, without disruption.

There is a HIGH risk of ill health due to stress, air and noise pollution and the impact on the everyday lives of the existing population.

The PSLP is flawed beyond acceptability and does not take into account the health, safety and disturbance to existing residents and businesses.

Investment will not be attracted for many years due to the highways delays that are already proving a major challenge for all road users.

The direct impact upon the area for the next 20 years, whilst the new roads and 6,000+ homes are being built, is unacceptable.

The PSLP is therefore unsustainable and not sound.

Policy STR9 - Green Belt

Similar to neighbouring Borough Councils in Tonbridge & Malling and Sevenoaks, TWBC has a high proportion of the and within its boundaries which is either AONB or Green Belt. Given the housing targets "imposed" by Central Government, developing the required levels of housing, alongside the constraints of the AONB and Green Belt, provides a significant challenge to TWBC.

That said, if we look back at the Site Allocations proposals by TWBC of 2016 there are some interesting views expressed by the Inspector (Rynd Smith) who reviewed them and reported back to TWBC on 9th June 2016:

- . **Bullet point 22** – ".....On this basis, there is not a shortfall of allocated and deliverable land in Royal Tunbridge Wells and Southborough and the rural fringe. It follows I do not accept a need to allocate any land currently in the Green Belt."
- . **Bullet point 24** – "It follows that I agree the approach the SALP has taken to the Metropolitan Green Belt and I have not recommended that any land currently within the Green Belt should be allocated."
- . **Bullet point 79** – "**The SALP has a number of deficiencies in relation to soundness, and, or legal compliance for the reasons set out above which means that I recommend non-adoption of it as submitted, These deficiencies have been explored in the main issues set out above.**"

A very different picture emerged at the Regulation 18 Consultation, perpetuated now in the PSLP, when the majority of the Metropolitan Green Belt in the "rural fringe" was put forward as Strategic Sites for Tudeley Village and East Capel/Paddock Wood. Additionally, comments expressed by the Inspector regarding drainage and flooding concerns at Bullet points 43, 60, 65 and 67.

As a result, the PSLP is therefore unsustainable and not sound.

Policy STR/SS1 - Strategy for Paddock Wood and East Capel

The format of the online submission tool means that one has to make two submissions, one for each of the Strategic Sites one objects to. The crossover between the two Strategic Sites, and the impacts on the community, are very similar. Therefore, there will be repetition between the two submissions.

I apologise to the Inspector for this duplication, and he/she having to read the same thing twice, but this is the nature of the beast that technology has created for this process, rather than the fault of any responders.

Policy STR/SS3 - Strategy for Tudeley Village

The format of the online submission tool means that one has to make two submissions, one for each of the Strategic Sites one objects to. The crossover between the two Strategic Sites, and the impacts on the community, are very similar. Therefore, there will be repetition between the two submissions.

I apologise to the Inspector for this duplication, and he/she having to read the same thing twice, but this is the nature of the beast that technology has created for this process, rather than the fault of any responders.

Policy TP1 - Transport Assessments etc

The Policy TP1 as written is good words and gestures. However, there are a number of issues with this, particularly in relation to the two Strategic Sites at Tudeley Village and East Capel. These include:

- . Little, or no evidence of KCC's involvement/agreement/approval of the Transport Assessments. For the two Strategic Sites the transport infrastructure issues are so large that KCC's views can not be left to a later stage in the process.
- . Independent Consultants (motion.co.uk) have been employed by Save Capel, and Friends of Tudeley (FoT) have employed another consultant (connect.co.uk) to review the Transport Assessments in the PSLP. Both consultancies are very experienced in this situation and both agree that:
 - . The modal shift within the plan is unachievable and therefore the traffic projections are very optimistic on the low side of the spectrum.
 - . The proposed mitigations are unrealistic in terms of physical and fiscal restrictions.
 - . The proposed Five Oak Green bypass, no discussions have been held with either of the two landowners about this proposal; both are adamant that they will not sell willingly.
 - . The impact of "closing" Hartlake Road, except to buses, has been totally underestimated.
 - . Linked to the point above, there appears to be little, or no, consultation with either TMBC or MBC about their own development plans on the border with TWBC, therefore, the projections are an "internal to TWBC" assessment rather than a more holistic approach involving their neighbouring Borough Councils.

As a result, the PSLP is therefore unsustainable and not sound and questions must be asked about the Duty to Co-operate with TMBC and MBC on the Transportation and Traffic Issues.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Quite frankly, the PSLP process needs to be suspended and TWBC need to start again from scratch. They should focus on:

- . Realistic assessment of housing needs rather than government-imposed targets and then with a 1,000-home buffer!
- . Spreading the Place Shaping across the Borough rather the present over-reliance on delivering the undeliverable of the two Strategic Sites at Tudeley and East Capel/Paddock Wood, on TMBC's doorstep.
- . A proper assessment of Infrastructure requirements, especially for transport, to reflect the needs of a revised Plan.
- . Much better liaison with neighbouring Councils, particularly TMBC and MBC, and the infrastructure requirements and impacts of their own Plans.

The current PSLP has been a rushed, botched and biased attempt, with 50% of the Borough's housing needs being forced onto 2% of the population who are represented by just 1 Councillor out of a total of 48.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jonathan Kellett ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jonathan Kellett ([REDACTED])
Comment ID	PSLP_1337
Response Date	04/06/21 16:16
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Jonathan Kellett
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I believe it is not justified for the reasons set out below.

Bullet points only.

- 1 The proposals require the destruction of many acres of green belt.
- 2 Under the Government proposals for "levelling up" to bring this size of development into Kent which is already one of the most densely populated rural areas in the country is contrary to that policy.
- 3 Unemployment in Tunbridge Wells and Tonbridge and Malling is currently around 4.5%, some of the lowest figures in the country. Any argument that the promotion of jobs by this scheme is beneficial is without foundation.
- 4 The disruption of the local communities by the massive and invasive building and infrastructure works for years involved are disastrous and cannot be contained. This is on top of the significant increase in proposed HGV traffic resulting from further gravel extraction in the area.
- 5 The geography of the area means that those who need transport into London or other centres (which will be many of them) will travel to Tonbridge which is already overcrowded and the topography means that from Tudeley to Tonbridge by foot or by bicycle is unrealistic unless you are young and fit. There will inevitable be a huge increase in cars - several thousand - which is entirely against government policy on reducing pollution. Anyone who believes that electric cars is the answer has not understood the science.
- 6 When I worked for the Citizens Advice Bureau for three years it became clear that the real need was for social housing in or close to towns where people could walk to work or to transport hubs. Unless they were disabled and had grant maintained cars, they had no funds for running private cars. Brownfield sites in and around towns or areas close to the towns/hubs are the answer not irrelevant "new towns" away from established centres/hubs.
- 7 Apparently the proposals include a suggestion that traffic problems could be reduced by closing Hartlake Road between Golden Green and Tudeley. I fully support banning totally HGVs from this road but it does provide an invaluable link for Golden Green to access Pembury Hospital, the A21 and Tunbridge Wells without passing through Tonbridge on the overcrowded A26 or going through Paddock Wood. What would help is to make Victoria Road one-way leaving Golden Green to stop the rat run of cars cutting from Hadlow through the village and onto Hartlake Road.

There are flooding issues upon which I am not qualified to comment but do not seem to have been adequately addressed.

In summary, I believe this whole development to be misconceived - in the wrong area and for the wrong reasons. To destroy a community needs a much more convincing argument than has been put forward than these developers.

Jonathan Kellett

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Strategic Planning ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) (Strategic Planning - [REDACTED])
Comment ID	PSLP_2196
Response Date	04/06/21 16:56
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Kent County Council-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP_2164), Section 2 (PSLP_2168), Section 3 (PSLP_2169), Policies STR1 (PSLP_2170), STR2 (PSLP_2171), STR4 (PSLP_2172), STR5 (PSLP_2174), STR7 (PSLP_2175), STR8 (PSLP_2176), Section 5 (PSLP_2177), Section 5: Royal Tunbridge Wells (PSLP_2178), Policies AL/RTW1 (PSLP_2180), AL/RTW5 (PSLP_2181), AL/RTW7 (PSLP_2183), AL/RTW14 (PSLP_2184), AL/RTW17 (PSLP_2185), AL/RTW21 (PSLP_2187), STR/SO1 (PSLP_2188), AL/SO1 (PSLP_2190), Strategic Sites (PSLP_2192), STR/SS1 (PSLP_2193), STR/SS2 (PSLP_2195), STR/SS3 (PSLP_2196), STR/PW1 (PSLP_2199), AL/PW1 (PSLP_2200), STR/CA1 (PSLP_2201), AL/CRS1 (PSLP_2202), AL/CRS2 (PSLP_2203), AL/CRS3 (PSLP_2204), AL/CRS4 (PSLP_2205), AL/CRS6 (PSLP_2206), AL/CRS7 (PSLP_2207), STR/HA1 (PSLP_2208), PSTR/BE1 (PSLP_2209), PSTR/BI 1 (PSLP_2210), PSTR/BM1 (PSLP_2211), PSTR/FR1 (PSLP_2212), PSTR/GO1 (PSLP_2213), PSTR/HO1 (PSLP_2214), AL/HO1 (PSLP_2215), PSTR/LA1 (PSLP_2216), AL/LA1 (PSLP_2217), PSTR/PE1 (PSLP_2218), AL/PE4 (PSLP_2219), PSTR/RU1 (PSLP_2220), PSTR/SA1 (PSLP_2221), AL/SA1 (PSLP_2222), PSTR/SP1 (PSLP_2223), EN1 (PSLP_2224), EN3 (PSLP_2225), EN4 (PSLP_2226), EN5 (PSLP_2227), EN8 (PSLP_2228), EN9 (PSLP_2229), EN10 (PSLP_2230), EN12 (PSLP_2231), EN13 (PSLP_2232), EN14 (PSLP_2233), EN18 (PSLP_2234), EN19 (PSLP_2235), EN20 (PSLP_2236), EN25 (PSLP_2237), EN26 (PSLP_2238), H1 (PSLP_2239), H3 (PSLP_2240), H7 (PSLP_2241), ED1 (PSLP_2242), ED2 (PSLP_2243), ED3 (PSLP_2244), ED4 (PSLP_2245), ED5 (PSLP_2246), ED6 (PSLP_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP_2248), Policies TP1 (PSLP_2249), TP2 (PSLP_2250), TP3 (PSLP_2251), TP4 (PSLP_2252), TP5 (PSLP_2253), TP6 (PSLP_2254), OSSR1 (PSLP_2255), Appendix 4 (PSLP_2256) and Evidence Base (whole Plan) (PSLP_2257)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Education

The County Council supports the proposal for a new three form entry primary school within the development. The County Council would request that additional land to support the expansion of Capel Primary School must be secured through this policy to enable the school to expand from one form entry to two form entry. The County Council notes the revised location of the secondary school, which from an education perspective, is a much more satisfactory solution.

The County Council notes that the necessary new secondary school required to meet the additional demand for secondary school places arising from Paddock Wood and Tudeley Garden Village is outlined in Policy STR/SS 3 2d as to the South East of the proposed Garden Village. The County Council considers this an appropriate location to meet the educational needs and does not hold concerns regarding the suitability of this site, subject to site inspections and investigations at a later date.

Sustainable Urban Drainage Systems

The County Council supports the requirement for a Drainage Strategy for development coming forward within the Tudeley and would reference commentary stated for Policy STR / SS1 as also applicable for this policy, stated for STR/SS1.

The County Council requests that clarity is provided regarding the development boundary on the northern border and the proximity to the areas of flood risk around Tudeley Hale. Surface water drainage measures to serve the proposed development must be outside of any areas of potential flood risk. This must be included within any design code for the development area.

Public Rights of Way

The County Council considers that this proposal offers significant opportunities for future sustainable transport and would therefore recommend specific mention of the PRoW network. Improvements and upgrades to the network will help create high quality connections both within the Garden Village and to the wider Borough. Mitigation will need to be sought to take account of the increased use of the network resulting from this growth proposal.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Question 7

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Nigel Lambert [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Nigel Lambert ([REDACTED])
Comment ID	PSLP_228
Response Date	20/05/21 10:37
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Nigel Lambert
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Reg 19

Site of Tudeley Garden Village proposal :

Policy STR/SS3

I have objections to the Tudeley Village proposal.

I have lived with my Wife and Daughter at xxxx [TWBC: full address redacted] Brampton Bank, Five Oak Green Road, Tudeley since 2008.

I have concerns regarding the size of the new development and the impact on the surrounding area and effect on the local community.

The proposed site for the village would be directly at the foot of our lovely garden.

Flooding and subsequent drainage is a major concern, which happens frequently in the surrounding area.

Detrimental affect on the established woodlands and wildlife.

Building on the 'Green Belt' rather than Brown Field sites that are available such as the Blantyre Prison site Sustainability Proposal page 86 which includes fields and is around 80 Hectares in size. The Tudeley proposal is on 94.7 Hectares of land.

Noise, Light, Dust and Sound pollution during and after building.

There are seven road/junction accesses between Church lane and the Vale Road roundabout on the B2017 which is a winding road with many blindspots. The volume of traffic is already high and used as a route between Tonbridge, Paddock Wood and Pembury if the A21 is blocked for any reason such as an accident. The current speed is 30mph through Five Oak Green until just after Capel Primary School. It then increases to 40mph and then to 50mph approaching Tonbridge. Church lane and the B0217 are very busy with parked cars during school drop-off and pick-up times.

Infrastructure and road maintenance of the B2017.

Communication and conflicts between Tunbridge Wells Borough Council and Tonbridge and Malling Borough councils. Impact on Tonbridge.

Castle Hill proposal adjacent to the A21:

Capel Sustainability Proposal page 86.

There is a lot of infrastructure already in place.

It has close proximity to North Farm Industrial estate, which provides Supermarkets, DIY outlets, Electrical outlets, Gyms, Car Sales rooms, Tyre outlets, Pet stores, a Cinema, Bowling Alley and various eat in or take away food outlets.

The proximity to Tunbridge Wells is close and could be easily accessible by footpath, bus and a cycle lane if put in place. It is also possible to walk in to Tunbridge Wells. There is a rail station which provides services between London and Hastings.

Although the land has AONB, a similar impact if not worse would happen if the proposed Tudeley Village was approved.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Sustainability Proposal page 86.

There are other options available rather than the extensive building proposal of Tudeley Village.

Blantyre Prison site and Castle Hill.

There would especially be less impact and a better infrastructure to build at Castle Hill with its proximity to the A21, Hospital and North Farm Retail and Industrial site.

I do not believe Tunbridge Wells Borough Council have taken in to account of the options available than the Tudeley Village site.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Petrina Lambert [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Petrina Lambert [REDACTED]
Comment ID	PSLP_224
Response Date	19/05/21 16:53
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Petrina Lambert
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Reg 19

Site of Tudeley Garden Village

Policy STR/SS 3

I have lived at Brampton Bank in Tudeley since 2008 and know the area very well and will be directly affected by the proposal. I have many concerns about the development and its lasting impact on the area.

It concerns me that the new garden village will be 3 times bigger than the existing combined villages in the area. With this development and that at Paddock Wood it will cause coalescence joining the two towns of Tonbridge and Paddock wood with very little green space between the 2 towns. It will remove a large piece of the Green Belt. This will affect the air quality and increase the light pollution in this area. It will increase the light pollution and air quality to the adjoining AONB. Tonbridge already has an air pollution problem and has reduced the whole town to 20mph to help to deal with this. The proposed green spaces to be included in the development are no compensation for the loss of wildlife (hawks, owls, pheasant and amphibians, some of which are protected species), green belt, biodiversity and good agricultural land. I believe it will be an environmental disaster for the area.

Supporting documents for reg 19, see site assessment sheets for Capel, page 10. It states 'not considered suitable' after listing all the effects of the development on this area.

Flooding in this area and the village of Five Oak Green is a real problem, putting a few extra ponds in and under water storage won't solve the problem of surface water flooding if you are going to increase the problem with hard surface areas and reduce the capacity of the land to soak away the water naturally. According to a consulting report by JBA Consulting, page 97 in the supporting documents it states that 75% of this area is already subject to ground water flooding and will only increase over the years. Insurance companies already claim extra insurance because of the risk.

We live directly on the B2017, in the mornings this road is almost impossible to drive on to safely. There are frequent accidents and one fatality in 2019. The road has many blind bends and people rarely adhere to the 40mph speed limit. Despite being sign posted as not suitable for HGVs the lorries still use it as the quickest route to Paddock wood and Maidstone from Tonbridge. The increase in traffic will only make this road more dangerous. This is evident by the number of visual display mirrors along the road already. On page 8 of the Capel Site assessment there is no mention of the B2017 as this will be the main road for all the traffic from the new development I think that this is a serious omission. There, as far as I can find out, have been no surveys on traffic movement along this road. Most people here travel to Tonbridge, Maidstone and Paddock Wood and not Tunbridge Wells. The proposal of a new road to by pass Five Oak Green and join at the existing primary school will not ease

the traffic or help us that live further along the road. There is a serious bottle neck at the school at pick up and drop off times when the road becomes a single lane, with parents parking along Church Lane at the junction and along the main road. I can not see that adding an extra road to the junction will help anyone.

Duty to cooperate. I don't believe that this has been fully met with the people who live in the area who are mostly affected. They displayed the proposals miles away in Tunbridge wells with no direct public transport links or parking. We have 2 village halls, why did they not use them? The plans were in discussion for several years before they were made public. Other options were not seriously considered. After the options and Issue documents were produced, 60% people thought that building along the A21 was the best option and the suggestion of a new garden village had lower support but there was no mention of where it would be built either. There are better places in the borough that are not good agricultural land or subject to flooding or green belt and have better infrastructure in place. Sustainability proposal page 86, Blantyre prison site. This site includes surrounding fields and is about 80 hectares in total, the development area at Tudeley is 94.7 hectares. The reasons for not developing it can be applied to the site at Tudeley for accessibility etc and location should not be a reason for refusing development as they propose a new road to service the Tudeley Development anyway. Castle Hill falls in the industrial estate at Tunbridge wells, it already has infrastructure and road network in place. It is AONB but will still cause less disruption and damage to the environment, it has a station nearby and supermarkets in place.

In conclusion I believe that this is an unsustainable development and will cause lasting damage to the environment and great loss to the area.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Sustainability proposal page 86, Blantyre prison site. This site includes surrounding fields and is about 80 hectares in total, the development area at Tudeley is 94.7 hectares. The reasons for not developing it can be applied to the site at Tudeley for accessibility etc and location should not be a reason for refusing development as they propose a new road to service the Tudeley Development anyway. Castle Hill falls in the industrial estate at Tunbridge wells, it already has infrastructure and road network in place. It is AONB but will still cause less disruption and damage to the environment, it has a station nearby and supermarkets in place.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: No, I do not wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_120

Comment

Consultee	Mr and Mrs Leach [REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr and Mrs Leach [REDACTED]
Comment ID	PSLP_1906
Response Date	03/06/21 23:06
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1894,1900,1906

Data inputter to enter their initials here AT

Question 1

Respondent's Name and/or Organisation Mr and Mrs Leach

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR 1, STR 9, STR/SS 1 and STR/SS 3 – see Comment Numbers PSLP_1894, PSLP_1900, PSLP_1906 and PSLP_1907]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Re: Pre-Submission Local Plan (Regulation 19 Consultation) – Comments

Further to our comments on the Draft Local Plan, during the previous Consultation (Regulation 18). We again write to you, to raise our concerns about the proposed garden settlements and to object to various policies, as we do not believe that our original concerns, and those raised by others, have been adequately addressed in the Pre-Submission Plan.

We wish to take this opportunity to reiterate and elaborate on some of our key concerns, as outlined in our previous letter (dated 25th October 2019). In an effort to be concise, we will not repeat all particulars and so the reader is referred to this letter for context and completeness. For ease of reference, we have enclosed a copy of our original letter (in Appendix A).

Following the publication of Pre-Submission version of the Local Plan, we also now wish to raise other concerns, such as the legal compliance in-terms of the Duty to Co-operate and consistency with national policies.

Our comments on the Pre-Submission Local Plan, related to several policies, are outlined under the headings stated below. We are specifically concerned about the deficiencies in the proposed strategic infrastructure and the questionable need to release Green Belt land.

3. Policy STR /SS 3 – The Strategy for Tudeley Village

Object as we have concerns over the **soundness** (i.e. the justification, not positively prepared and inconsistency with national policy) of this Policy.

Our concerns and comments, are outlined as follows:

3.1 With regard to our previous letter (1.1-1.3, appended) and Section 1 above (1.15-1.18), we highlighted how there is insufficient infrastructure/road improvements proposed and inadequate public transport options to address the severe highways impact and the other concerns raised. As such, in our opinion the proposed Strategy is not sound, as the proposals (incl. Infrastructure Delivery Plan (Tunbridge Wells Borough Council (2021). 'Local Plan, Infrastructure Delivery Plan, Draft ...'. Web link: https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/388026/Infrastructure-Delivery-Plan_2021.pdf [Mar. 2021])) fail to adequately meet the identified infrastructure **needs**, as discussed in Section 1, to support this huge Strategic site.

3.2 With reference to Paragraph 35 of the NPPF (2019), one of the two criteria that Local Plans are assessed against is whether it is positively prepared and it is consistent with national policy, the former is stated below. (our emphasis added)

*Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed **needs** ...where it is practical to do so and is consistent with achieving sustainable development*

3.3 Based on the above Strategy shortfalls, in-terms of infrastructure needs, and as the NPPF (Para. 35, 2019) requires a strategy that "meets the area's ... assessed needs", we reiterate that this Strategy fails the test of Positively prepared and so is unsound.

3.4 In our previous letter (2.14-2.17), we also remarked that the reliance on two large nearby Strategic sites (e.g. Capel: 51% of new homes) risks the allocation deliverability, due to the super-saturation of

the local housing market, with likely low build-out rates. This is based on the Letwin Review (Rt Hon Sir O. Letwin MP (2018). Independent Review of build out, final report. MHCLG. Web link: www.gov.uk/government/publications/independent-review-of-build-out-final-report [Aug. 2020])(2018). In-addition, low-build rates will also undermine the viability of the proposed infrastructure and so compound such impacts.

3.5 Paragraph 16 (NPPF, (2019) states Plans should “be prepared positively, in a way that is aspirational but deliverable”. As such, we believe that the proposed Plan is not positively prepared nor is it deliverable. Therefore, we think modifications are required to make the Local Plan sound (incl. lower housing numbers in Capel and adequate infrastructure, e.g. a railway station to provide better public transport options).

3.6 On the basis, of the lack of infrastructure (e.g. insufficient highways improvements and public transport links, see Section 1 above), this Policy is unlikely to enable the “delivery of sustainable development”, as required in the NPPF (Para. 35 d), (2019). Additionally, we are also of the opinion that garden settlements, like the proposed, rarely deliver sustainable development; especially considering the lack of public transport options and the limited number of local jobs, which will make this a car reliant commuter settlement. In view of this and the points raised previously (e.g. in 1.4-1.6), we believe that this Policy is not consistent with national policy and so is not sound.

3.7 Further to our comments above in Section 2 (in 2.12-2.14), other factors need to be considered when determining exceptional circumstances for releasing Green Belt land. Most notably sustainability (questionable at this site – see 3.6), viability (questionable if adequate infrastructure is to be delivered – see 1.15-1.22, 3.5) and deliverability (questionable given the likely low build-out rates – see 3.4). In view of the questions over the sustainability, viability and deliverability of this site, less weight should be given to these factors. As such, we believe the Tudeley Strategic site would fail the test of exceptional circumstances, when considering that this site would cause the highest level of harm to the Green Belt (Tunbridge Wells Borough Council (2017). ‘Green Belt Study Stage Two’ Web link: https://tunbridgewells.gov.uk/__data/assets/pdf_file/0003/343839/Tunbridge-Wells-Green-Belt-Stage-2.pdf [May. 2021] and Tunbridge Wells Borough Council (2020). ‘Green Belt Study Stage Three, ...’. Web link: https://tunbridge-wells.gov.uk/__data/assets/pdf_file/0009/385317/Green-Belt-Study-Stage-Three_Rev1.pdf [Mar. 2021]), and so this Policy is inconsistent with national policy.

3.8 In addition, we are of the opinion that this Strategic site is not justified and so this Policy is not sound. With reference to our previous letter, we raised some concerns about justification of this Strategic site, which are still valid, in-terms of the allocation distribution (see 2.3) and release of Green Belt over brownfield sites (see 2.4 & 2.11). In Section 2 (above), we have elaborated on some of these original concerns.

3.9 We also note that many other people have previously raised concerns about flooding, which is a concern we share too. It is widely acknowledged that climate change will cause more intense rainfall and more frequent flooding. For instance, areas with a present-day probability of 1 in 100 years, are likely to have higher a probability (e.g. 1 in 75 years). The upshot of this that some areas previously designated as Flood Zone 1 (or 2) are likely in the future to have the same probability as Flood Zone 2 (or 3) is now, and so a much larger area of the Tudeley development is likely to fall within Flood Zone 2. The Government has declared a ‘Climate Change Emergency’ and so we cannot continue as before, just building on the floodplain, with the likely greater future flooding.

3.10 This development is likely to cause greater down-stream flooding. Moreover, the Leigh Barrier should not be relied upon, as water is released when it is at capacity (e.g. 2013).

3.11 In view of the flood risk, greater weight should be given against this site, as it is at risk of flooding (including Flood Zone 2). With reference to Paragraph 157 (NPPF, 2019), it states that Plans should apply the sequential test “taking into account the current and future impacts of climate change”. Again, there are site selection questions, with this Strategic site causing the highest Green Belt harm (2.3-2.5) and as it is partly located within Flood Zone 2, unlike other alternative sites (2.6-2.10). Thus, we believe that this site is not sound (i.e. not justified), as there are other more suitable alternative sites.

3.12 Please refer to our previous letter (see 2.7-2.12) that presented our concerns about the Sustainability Appraisal for this Strategic site, which is largely unchanged. In particular, one of our concerns related to the scoring of this Strategic site. Again, we have similar concerns about the up-dated Sustainability Appraisal; including the inconsistency of the scoring between the sites, with some favourable bias towards this Strategic site. For instance, Pembury site 190 scores neutral (“0”) for

Travel, compared to Tudeley that has a positive score (“++”), despite the Tudeley site having inadequate transport infrastructure (see 1.15-23). Whereas, Pembury has better transport links - main roads, e.g. A21 and A228/A264, good bus services and cycleways. A comparison of these two sites was made by SaveCapel6 (Appendix C) and highlights many inconsistencies.

3.13 Furthermore, even though the Land use scores the worst, we do not believe that the scores for Options 1 and 2 (i.e. “--” or “--/---”) reflect the true total negative score (i.e. “---”) of this site, due to the inefficient development land use, with low housing densities (see 2.11-2.12 above). In our previous letter, we also discussed how unsustainable the site allocation was, with an approach that appeared to favour Green Belt release over re-developing brownfield sites (see 2.10-2.12 of our previous letter and 2.8 above).

3.14 The Sustainability Appraisal (in Section 6.2.35) recognises some of the negative impacts that this development, would have, with most of the environmental objectives having negative scores. With reference to our previous comments (in 2.8d), we highlighted that there are insufficient net gains across the other overarching Objectives (economic and social) to offset the immense environmental harm of this Strategic site. Moreover, in view of the biased site scoring (3.12), the severe wider highways impact that is not recognised in this scoring (1.17 & 1.20 - e.g. congestion and air pollution – economic/social impacts) and as the down-graded heritage score (i.e. a social harm), there will be even fewer net gains, in which to offset the high environmental harm.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Comment

Consultee	Colin Leake [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Five Oak Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Colin Leake [REDACTED]
Comment ID	PSLP_32
Response Date	09/04/21 14:15
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.2
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr Colin Leake
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3: The Strategy for Tudeley Village
All related to garden village

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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With regard to the proposed development of a "Garden Village" in Capel the local plan gives many assurances but no details of how they would be achieved! It avoids completely the possibility of pollution from a nearby old land fill site. It ignores unstable land with a layer of clay on top of gravel! It claims it will increase biodiversity which is impossible. It includes no details of how essential facilities such as sewerage, water, gas, electricity and telephone all of which would need to be in place before building could start will be provided. Provision for schools seem not to have been covered. Flooding on this site is so bad that it has been possible to swim in the water on occasions. They give no details as to how this would be dealt with. BR have already discounted the possibility of a new station. This would mean that residents would need to travel to Tonbridge or Paddock Wood to catch a train into London resulting in traffic congestion. Neither have any available car parking and in any case they would be joining a line that already has severe capacity problems. Local plans are supposed to meet local needs so how can this be achieved by concentrating all the development in one area? There are many more suitable sites available that the planners seem determined to dismiss. One between the A21 and the outskirts of Tunbridge Wells has none of the problems on flooding or connectivity yet the planners seem determined to find reasons to reject this site. The site is a natural flood plain if it is developed the only place the water could go is in the Medway making an already bad flood situation down stream worse. Not very responsible. Because of the bad ground conditions building would be difficult. Couple this with the cost of providing service one wonders if the site is even viable. The site belongs to a single land lord making this an easy but irresponsible option for the planners which they seem determined to pursue by excluding all alternative sites. The plan should provide housing for the local population but is more likely to cater for Londoners wishing to move out of London based on what seems to be happening on other sites. The form used for submitting objections is much longer and more complex than it needs to be almost as if it was designed to put people off! All it needs is a simple form to enable personal details, the development objected to and a box to enter specific objections, two pages max. Is the number of houses planned in line with latest government guidelines?

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

this is the job of the planners

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Mr Colin Smith [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Colin Smith Planning Ltd
Address	[REDACTED] Redhill [REDACTED]
Consultee	Leander Homes [REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Leander Homes [REDACTED]
Comment ID	PSLP_423
Response Date	26/05/21 10:34
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Leander Homes
Question 2	
Agent's Name and Organisation (if applicable)	Colin Smith Planning
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant Yes

Is sound No

Complies with the Duty to Cooperate Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Draft policy STR/SS 3 provides for a new village settlement at Tudeley village. In summary the draft policy seeks to provide a new garden settlement for 2,800 new dwellings, with associated shops, employment uses, and community and leisure facilities. Part of the policy includes the provision of improvements to the A228 around Colts Hill, and the provision of a new highway which bypasses Five Oak Green. Compensatory improvements to the Green Belt are also to be proposed.

Positively prepared. The main issue with this draft policy is that it will involve a significant incursion into the Green Belt. There will be a significant environmental impact as a result of the development of land currently in the countryside and within the Green Belt which amounts to the loss of 182 ha of land from the Green Belt. In addition, the High Weald AONB lies to the south of the B2017 and the northern boundary of the AONB abuts the southern and south-eastern boundary of the proposed site. The development will therefore have a direct impact on the AONB. The AONB designation is the highest level of protection and equivalent to National Park designation in policy terms. The impact on views from the AONB is likely to be significant and adverse. Whilst paragraph 5.209 refers to the approach set out in the NPPF that new settlements can result in the supply of large numbers of new homes, the draft proposal will be at a significant environmental cost in relation to the incursion into the Green Belt, the impact on the AONB and the impacts of the required highway improvements, in particular a by-pass around Five Oak Green.

As with the draft allocation at Paddock Wood/east of Capel, the end result would be the encroachment into the countryside and the merging together of the settlements of Tonbridge, the proposed new village, Five Oak Green and Paddock Wood. The present openness and freedom from development that exists between the western edge of Paddock Wood and the eastern edge of Tonbridge would be lost and the Green Belt developed over.

This does not constitute positive planning in that the environmental objective of the sustainability requirements set out on paragraph 8 of the NPPF will not be met, and the purposes of including the land within the Green Belt will be compromised.

Justified The policy is directly linked to the overall strategy set out in policy STR 1, which is not considered to be justified, as other representations set out. It is not considered to be an appropriate strategy to release such large areas of Green Belt land, and also to not provide development opportunities on the edge of existing settlements which would help to support and enhance the existing services and facilities locally. The release of smaller areas of Green Belt land would result in less of a compromise of the Green Belt, particularly in area BA4 of the Green Belt Study.

Part 8 of the draft policy sets out that compensatory improvements to the Green Belt should be provided. It is not clear what the compensatory improvements might be. Although it is set out in the supporting text that this is detailed in the Development Strategy Topic Paper, no detailed measures are identified. However, the purposes of the Green Belt are, in summary, to prevent inappropriate development and to maintain openness- this is the essential characteristic of Green Belts and the fundamental aim is to prevent urban sprawl (paragraph 133 of the NPPF). It is not clear how "improvements" would help to compensate for the loss of openness or prevent urban sprawl.

An alternative strategy, to identify small scale sites that extend existing settlements in order to support and enhance their growth would appear to be justified. It is therefore submitted that the proposed strategy, including the development of Paddock Wood and land at east Capel is not justified on environmental grounds.

Effective Based on the submissions above, it is further submitted that the draft policy STR/SS 3 would not be effective. Alongside the need to agree and adopt masterplan and Supplementary Planning Documents, the reliance on a single allocation to provide a substantial level of housing supply could result in a serious shortfall if not delivered.

Consistent with national policy As set out above and in other representations, the strategy involves a large-scale encroachment of built form over the Green Belt and the potential for neighbouring towns (in conjunction with the draft Paddock Wood proposal) to merge into one another. In this way there is a significant compromise of the purposes of including land within the Green Belt, and the draft policy (and the strategy overall) would not be consistent with the NPPF. In addition to the compromising of Green Belt purposes, paragraph 72 of the NPPF does set out that new settlements can make a contribution to the supply of new homes, but only provided they are well located and supported by necessary infrastructure and facilities. In this case, it is submitted that the proposed village is not well located (being in the Green Belt) and requires significant infrastructure in the form of highway improvements and a new bypass around Five Oak Green to support and justify it.

It is submitted that the draft policy is not consistent with national policy.

Question 6

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Policy STR/SS 3 should be removed and replaced with policies that identify alternative opportunities for development that involve modest extensions to existing settlements, releasing Green Belt land in a more managed way, and allowing the opportunity for growth to support and sustain local services and facilities. Such an approach would result in the draft Plan being positively prepared, justified, effective and consistent with national policy.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss the above arguments and assist the Inspector in addressing the Council's strategy.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Lear [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Lear [REDACTED]
Comment ID	PSLP_1244
Response Date	04/06/21 11:53
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	David Lear
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My name is David Lear and I have lived in Golden Green for over 22 years. Until recently I was a regular commuter to London.

I am writing to object to “The Strategy for Tudeley Village” (Policy STR/SS3).

I am deeply concerned at TWBC’s plan to create a new garden village (town?) in an area completely unsuited to such a development.

TWBC’s enthusiasm for developing 400 acres of Green Belt land, conveniently bypassing much of the plan preparation process, is worrying and gives force to the idea that the convenience of dealing with one landowner has far greater importance than following normal planning guidelines. Others have pointed out that an unwillingness to deal with multiple landowners is NOT sufficient grounds for destroying Green Belt land. For TWBC, there is of course the added advantage of siting over 60% of their new housing on the border with TMBC ensuring that all the disadvantages of the plan will fall into someone else’s lap. It is to the great credit of the Councillors of TMBC that they soundly criticised the plan at the Regulation 18 stage and continue to do so. I understand that TMBC have still not signed a Statement of Common Ground.

It is abundantly clear that the Tudeley site will create a significant additional burden on Tonbridge roads. The plan’s assumptions on reduced car use are completely unrealistic, based as they are on the provision of cycleways. No doubt TWBC Councillors are all enthusiastic cyclists but I will be first in the queue to watch them take on the challenge of the long, steep hill up from Tonbridge to Tudeley on a cold wet winter’s day. The existing road network around the proposed site is inadequate for the size of development and Tonbridge does not have the infrastructure to deal with the additional pressure that this development will create. During peak hours Tonbridge and its access roads are already unable to cope with existing traffic flows. The main access route from Tudeley to Tonbridge along the B2017 becomes a slow-moving queue of traffic backing up past the junction with Hartlake Road. Even if this road were widened with added roundabouts, no benefit would ensue because Tonbridge itself could not handle the additional traffic. Last week, TMBC rejected a planning application for a new supermarket at Tonbridge Retail Park because of concerns about the ability of the road network to cope. My understanding is that any major road development will not take place for some years into the project. Plans for the creation of new quarries in the immediate vicinity, additional development by Maidstone Borough Council at the Hop Farm and TWBC’s own proposals for extensive development at Capel and Paddock Wood will all add significantly to the problem.

Many of the new Tudeley residents would commute to London. Pre-Covid, trains from Tonbridge were already at bursting point with no spare capacity. Tonbridge station during peak hours is crowded with commuters and school children and could not conceivably take more. In my opinion the effect of “working from home” is seriously overstated and whilst there will be some drop in numbers travelling to London, once we return to a post-Covid normality the pressure to return to the office will minimise the impact. Other housing developments further down the line are expected to create capacity issues; 2,800 new homes in Tudeley could conceivably break the system. The existing parking at Tonbridge station is already insufficient for current needs.

I question the need for the number of houses that TWBC is planning to build. There must be “exceptional circumstances” to release Green Belt land for development. TWBC should be far more robust in challenging the existing numbers based on out-of-date statistics. Will the new development provide the right type of housing?. It is not just a question of numbers; housing needs to cater for those struggling to find accommodation. I seriously doubt whether a green field development, consisting no doubt mainly of substantial houses, will meet existing housing needs however lucrative for the developers. Much more likely is that the new development will draw people in from outside the area. TWBC was late in starting to update its brownfield register. Given that such land should take priority for development this should have been completed prior to any decision on building over Green Belt land.

Much of the development will be on the Medway floodplain. In the 20 odd years that I have lived in Golden Green I have witnessed significant flooding in East Peckham, Tonbridge and along the Hartlake Road, this despite the Leigh barrier. Last year, the papers were full of reports of disastrous flooding in parts of Yorkshire and Derbyshire, again despite significant investment in flood defences. Climate change is upon us and it seems foolish in the extreme to consider concreting over 400 acres of productive, absorbent agricultural land which can only exacerbate the existing threat of flooding.

There are many other issues to be considered, such as the threat to biodiversity, the pollution created by additional traffic jams, the risks to the heritage site at Tudeley Church and the provision of health and other services. These have been identified by others in their responses so I will not go further into detail.

I end by drawing your attention to a Planning Decision Notice, ref: 18/01767/FULL, dated 31 July 2018 and signed by one Stephen Baughen, the Head of Planning (Interim) at TWBC and who now, I believe, holds the position of Head of Planning Services. The Decision Notice refuses planning permission for a modest extension to The Poacher, a restaurant located at the very edge of the proposed new development.

The reasons given for the refusal are, in summary:

- 1 The proposal would constitute inappropriate development within the Metropolitan Green Belt and would be harmful to its openness. There is insufficient evidence of the necessary “very special circumstances” to overcome this harm.
- 1 The proposal would have more than a minimal impact on the landscape character of the locality. The overall impact is harmful to the rural character of the area.
- 1 There is no evidence that occupiers would not be at risk from flooding or that there would not be increased risk of flooding elsewhere. Therefore, the development is likely to result in a risk to human life from flooding.

A more glorious example of hypocrisy would be hard to find.

In summary, this proposal fails to meet the necessary soundness criteria on several grounds and should be withdrawn without further delay. All those responsible for its production and approval should look deeply into their consciences and reconsider this appalling proposal.

Question 6

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or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This proposal should be withdrawn from the TWBC Local Plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Comment

Consultee	Nicola Leeds ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Nicola Leeds ([REDACTED])
Comment ID	PSLP_2328
Response Date	04/06/21 16:53
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation	Nicola Leeds
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 Strategy for Tudeley Village

LCWIP Local Cycling and Walking Infrastructure Plan (p48)

[TWBC: this representation was set against the whole Plan but has been duplicated by TWBC at Policies STR/SS1, STR/SS2 and STR/SS3 for ease of reference - see PSLP_1310, PSLP_2326, PSLP_2327 and PSLP_2828 respectively]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
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Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have been a resident of Paddock Wood for 15 years, and have seen the expansion of the town even within that time. Despite promises, the infrastructure has never been delivered to address the issues created by the increase in housing. There has been increased flooding across the town, with more frequency, with some residents suffering from foul water in their homes caused by inadequate sewage systems having to cope with yet more residents. There has been a lack of investment by TWBC in Paddock Wood, no expansion of medical services, no improvement in the shopping facilities in the town, or in the leisure centre which is now run down. In fact, the opposite has been true. TWBC has consistently approved planning for developments that detract from Paddock Wood and add more problems without delivering on any of the investment that is critical. We have been promised time and again that there would be no further development without the infrastructure in place in advance. There is little or no regard on the impact of continued overdevelopment on the very nature of Paddock Wood and surrounding villages; no consideration of the increased flood risk to existing residents from the developments already approved, let alone those in the pipe line. And absolutely no consideration of the residents.

There is also a need to reassess the total requirement for housing going forward - the Government's "levelling up agenda" shows that increased housing will be needed in the north of England rather than in the SE corner - these changes in national approach have not been followed through into the local plan. TWBC have not sufficiently considered the future housing need of the borough to ensure that the number of dwellings being planned for is correct.

As part of the previous consultation on the local plan, TWBC included as part of its justification for building in Capel and Paddock Wood that the land owner had decided to sell the land, and that dealing with one land owner rather than several would be easier. This is possibly the worst, most egregious reason for building on one location that has ever been heard.

The local plan is not positively prepared, effective nor justified for a number of critical reasons.

Firstly, on the requirement for the plan to be positively prepared and effective. TWBC have not amended their plan to account for the changed circumstances brought about by the COVID 19 pandemic. The pandemic has shown that commuting and working patterns have changed and will continue to remain different to that expected pre-COVID - the local plan has not been reviewed to ensure it is fit for purpose going forward.

The vast majority of housing has been proposed to be placed at the tip of the borough - this site is entirely unsuitable for providing housing of increased job opportunities for the rest of the borough,

which stretches far to the east and south, whilst at the same time "lumping" the housing in one small area. The realities of travel across the borough means that this housing will not be suitable for those who live and are employed in, for example Cranbrook. Therefore, despite the stated aim of the plan to provide affordable housing and employment to the residents of the borough it will do the opposite. The proposal will result in people moving to the borough from outside it, ensuring that locals are unable to take advantage of the increase in housing, and inflating prices to the point that no one who works locally will be able to live here.

Much of the infrastructure included within the local plan will not be for TWBC to provide - and the rest will be dependent on "contributions" from developers. There is a very real risk that these will never materialise.

At the recent vote by councillors on whether to move to Reg 19 consultation, several of the papers were not made available, and worse, it was clearly stated in the meeting that some councillors had not even bothered to review the papers in advance of the vote. This is a clear abdication of responsibility, and undermining of due process.

Therefore the plan is not effective.

In relation to whether the plan is justified - the response to regulation 18 consultation was woefully inadequate - despite a large number of responses expressing serious concerns with the local plan (97% opposed the plan), these were not taken into account, with TWBC ploughing on with their proposal regardless of the views of the residents who would be affected by it. This makes a mockery of the consultation process required under national law. The only changes made were to exacerbate the issue by putting more houses into the plan for Capel and Paddock Wood.

The local plan also proposes to build on land that is at risk of flooding, while taking away agricultural land and green spaces. These are all in contravention of the stated aim of the plan.

The plan itself states that green belt is to prevent urban sprawl and should be protected - yet TWBC are proposing to remove 5% of green belt land in Capel parish to build the extension to Paddock Wood, and the Tudely Village. These are entirely unjustified removals of green belt land, and would in effect create a long corridor of development between Paddock Wood and Tonbridge. Green belt is meant as a protection - it should not be removed from such protection without significantly stronger justification. There are alternative sites which would not require the use of green belt land such as Castle Hill.

Flooding is a very real issue already in Paddock Wood and Five Oak Green. Flooding incidents are increasing, with the greatest threats coming from surface water flooding. The sites at Capel and Paddock Wood proposed for development are all prone to flooding, and play a key role in ensuring that existing developments are not affected more severely. This winter, the ground was saturated for weeks in the areas the plan expects to build. In Tudely, the water runs down the road like a river, and that is without the additional building in place. The proposal would remove trees and other vegetation that use the water; they would concrete over the very land with acts as a sponge. The mitigation that is proposed is insufficient to respond to this increased, and increasing risk. Combined with the proposal to create new roads to service these new developments, the issue just gets worse and worse. This is also against national policy which states that flood plans should not be built on where alternatives exist. Alternatives exist within Tunbridge Wells borough. Where mitigation plans are put in place, they will only exacerbate the impact on communities up and down river - places which already struggle with flooding - Tonbridge, East Peckham, Yalding to name just a few.

The plan also proposes to dig up more and more countryside to build additional roads to deal with the increased traffic - on yet more green belt and countryside. This area risks being covered in concrete, with the increase in air pollution, risk of flooding, reduction in green space and biodiversity the only likely outcomes.

The proposal made under the LCWIP Local Cycling and Walking Infrastructure Plan to block access to vehicles over the railway bridge will completely cut off half of Paddock Wood from the town centre - forcing all vehicles to use the A228, or country lanes. There is no consideration to the impact of having thousands of extra cars needed to make that journey, no consideration of the real world impact on the residents of Paddock Wood. What if there is an accident on the main road that closes it? What if an ambulance or fire engine is needed? What about residents who are less mobile? This plan will have the opposite effect to that stated. This has to be one of the most poorly thought through and ludicrous ideas within the local plan. Wishing that fewer people drove cars doesn't make it so. Taking other steps

- effective enforcement of parking on Commerical Road, creating a lively retail area rather than permitting more and more flats to be built in place of retail units will be much more likely to.

This plan goes against national policy - there is no provision for addressing the biodiversity crisis, no substantive plans to mitigate against the impacts of climate change with the expected increase in flooding. There is no recognition of the importance of green space for residents of Paddock Wood. There is no substantive plan for ensuring biodiversity net gain across the plan.

The only part of this plan I can support is the provision of a swimming pool - and yet, even with all the housing planned, it's still only potential in the plan. There is no assurance that ANY of the "benefits" put forward will be realised.

Paddock Wood has already absorbed 1000+ housing units, the intention to build yet another 6000+ dwelling within the space of 5 miles is utterly without consideration of the current character of the area, or its residents. Paddock Wood will grow in area by 200%, Tudely will expand by 500%. This is completely disproportionate. Local residents are being ignored.

It is also clear from the representations from Tonbridge and Malling Borough Council (TMBC), and its many residents that the duty to cooperate has been entirely disregarded by TWBC. The impacts of the exponential growth in housing proposed under this local plan will be felt by neighbouring local authorities as the services and infrastructure required by such a significant increase in housing and population will predominantly be felt by TMBC and Maidstone BC rather than by TWBC, but will not receive any revenue from council tax etc. the increase in traffic alone will have a significant impact on the residents of TMBC, there will be an increase in the number of people expecting to attend Tonbridge schools, and use leisure facilities in Tonbridge. TWBC's intention to put the vast majority of its intended housing growth right on the border with 2 other local authorities shows a blatant disregard for the knock on impact on those boroughs.

Question 6

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TWBC need to LISTEN to its residents and neighbouring local authorities. There needs to be a fundamental reassessment of where additional housing is needed in the borough and not take the easy approach of putting the vast majority of housing into one small area of the borough which won't support other residents and unfairly results in 15 years of disruption for a small proportion of the borough's residents. This will help address the effectiveness of the plan.

Alternative sites need to be considered - and some have already been offered up by developers. There has been inadequate consideration of brownfield and alternative sites, with simple dismissal of such ideas in response to proposals offered under previous consultations. These sites should be where they are not on flood plains, not on good agricultural land that will be lost forever, and not where the impacts of the developments will be felt almost entirely by a small proportion of residents and by those residents of neighbouring local authorities who will not benefit from any additional funding.

In addition, options 7 and 8 as set out in the Sustainability Appraisal should be further considered to more fairly distribute housing need across the borough.

Should development continue in Paddock Wood and Tudely Village, it must be a requirement that the additional services and infrastructure the plan suggests "may" follow need to be in place first. There

needs to be a complete rethink of the LCWIP Local Cycling and Walking Infrastructure Plan so that the road bridge in Paddock Wood is not closed.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

the assessment of impact on the sustainability objectives in table 15 of the SA are not accurate - the benefits are overplayed - they would not be felt across the borough, the developments will not provide social mobility and inclusion as suggested, and the negative impacts on air, biodiversity, climate change, health, noise, travel and water are all under recognised.

Future Notifications

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Supporting Information File Ref No: SI_69

Comment

Consultee	Konrad Legg [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Konrad Legg [REDACTED]
Comment ID	PSLP_1162
Response Date	03/06/21 21:33
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.9
Files	P-S Local Plan 030621.pdf
Question 1	
Respondent's Name and/or Organisation	KONRAD LEGG
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3 The Strategy for Tudeley Village [TWBC: duplicate of PSLP_1159 submitted]	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Policy STR/SS3 Tudeley Garden Village.

I believe that this strategy should be removed from the P-S Local Plan as this part of the plan is unsound and if not removed will make the whole plan unsound and ineffective.

- 1 **Very special circumstances.** - There are no special circumstances to justify removing 170 hectares of land from the Greenbelt. If it were true that the borough was so constrained, that it could not find the amount of land elsewhere, then that would itself constitute a justification to request other neighbouring boroughs to fulfil the unmet housing requirement. If that failed, then TWBC would have an excellent reason for informing Central Government that they would be unable to fulfil their housing target.
- 2 While it may be true that some 70% of the borough is designated as Greenbelt or AONB. If one assumes that up to a maximum 10% of the borough is already developed, (or otherwise constrained) then there remains at least 20% of the Borough, that could be made available for development ie, something over 6000 hectares. I just find it unbelievable that none of this land could be made available for housing.
- 3 **Brownfield land.** – the use of such land is a priority in the NPPF and in the latest Government policies. While it is true that TWBC has been maintaining a Brownfield land register, there is little evidence of new sites being identified and included. There is no evidence that the Council has given high priority to hunting out additional Brownfield sites to include in their register. To use Greenbelt, when Brownfield site options have not been vigorously exhausted, seems to be against NPPF and Government policies.
- 4 **Housing density.** There is substantial scope for increasing housing density. This is particularly relevant to address the key findings of the Council's Housing Needs Study. This study makes it clear that the overwhelming requirement is for affordable homes, and homes for older people. Much higher densities must be planned for to enable the council to meet its targets and face the economic reality of affordability.
- 5 **Town Centres** - I am not convinced that the council is making the best use of these areas to provide additional housing. High street retail activity is reducing, and this trend is likely to continue, thus making available town centre sites suitable for redevelopment. This should present an ideal opportunity to address the need for affordable homes, homes for old people, enabling reduced transport needs and easy access to town centres.
- 6 **Lack of Community engagement.**

I have a legitimate concern that no real consultation of any sort took place before the decision was taken to include this area in the Draft Local Plan.

The Localism Act of 2011 and the policies enshrined in the latest NPPF regulations make it clear that community engagement is essential. The Chairman of the Capel Parish has confirmed that, although he was aware of the proposed housing development before it was announced publicly in May/June 2019 the parish councillors had been required to sign an NDA to prevent them from discussing the proposals with the residents.

The key factor that seems to have obscured rational thinking and the obligation to ensure local engagement about the proposed garden village is the overriding attraction to the council of having only one landowner to deal with. For that benefit TWBC has sacrificed the support of the local community and substantially increased the risks of a failure in delivery of their plan.

It is still not clear to me why these proposals were not properly discussed with the local community. The Parish of Capel has a good track record in responding to planning initiatives. In 2006 the Parish produced a comprehensive Capel Parish Plan which dealt with many of the defects of the settlement at Five Oak Green and the aspirations of its residents. Many of the conclusions of that report remain unfulfilled today, because of factors outside the control of the Parish Council.

I believe the selection of the site at Tudeley has been 'managed' over a long period to ensure the local people did not have a proper say. It is a process worthy of 'Yes Minister'. First, you have an Issues and Options public consultation setting out five Options for growth in housing numbers over the 15 year planning period. Little information is offered about Option 5 – the creation of a Garden Village somewhere in the Borough. Certainly, no possible locations were mentioned (and no suggestion whatever that it might be wholly on Greenbelt). Even so the clear response from consultees favoured other options for growth, not a garden village. Then, when the Draft Local Plan (DLP) was published in July 2019, the central plank of the plan was to locate a garden village on the greenbelt at Tudeley. There has still not been any proper explanation of why the views of the consultees in the earlier Issues and Options consultation were ignored.

In the DLP Plan little detailed information on exactly what was proposed was provided. The excuse tendered at the time, was that land was only offered at a late stage, and that there was insufficient time to carry out all the detailed assessments and costings that were required. The residents were told not to worry as they would be able to study the Masterplan and that Hadlow estates would be providing a presentation shortly. The net effect has been that the community has had no engagement whatever in this 'decision making' process and TWBC has totally abrogated its duty of care to its constituents. This cannot be the whole story. Hadlow Estates will have had frequent interaction with the council over many decades concerning planning matters relating to the nearby mineral extraction and more recently relating to matters associated with their nearby large solar park and the large extension to the equestrian centre at Bank farm. The LPA will have had, or at the very least, ought to have had, a clear view of the future aspirations of that landowner.

It is just a shame that these thoughts were not shared with the community with a view to arriving at a level of development that might be acceptable..

TWBC have successfully sponsored a number of Neighbourhood Development Plans in the borough, it is unfortunate that no such Capel Plan was established until after it was too late for it to play any part in this decision making process.

Once there was the slightest hint of a largescale development in the Parish, there should have been pressure from TWBC to the Parish Council to create such a plan to inform future development policies.

When the P-S Local Plan was published in March, it became clear that once again TWBC had taken little notice of the very extensive raft of constructive criticism that had been levelled at the proposal to build a Garden Village at Tudeley. It is now clear that any engagement with the community purely to inform and comply with regulation with no intention of seeking input from the community. The net result is that we were presented with a 'fait accompli'..

I believe that the proposed Garden Village at Tudeley is seriously unsound and will be disastrous for the community and ineffective in delivering the requested number of new houses for the borough in the timeframe envisaged. It is unsound because the plan relies far too heavily on STR/SS3 and the strategy for Capel (STR/CA1).

If this proposal were to go ahead it would require exceptionally large amounts of capital for infrastructure, virtually most of which needs to be provided upfront, and the work completed before any housing development can take place.

1 Cumulative effects and sustainability

The Strategy for Tudeley Village does not explain properly the implications of the close proximity of the new Village to the already approved sites for the extensive mining of sand and gravel. These mineral deposits lie only a very short distance from the proposed Village site along the Medway Valley. The plan does not properly explain the potential conflicts that may arise from that close proximity, nor does it explain that in the event of such conflicts that mineral extraction will (NPPF) take priority over other issues. Nor does it address the cumulative adverse effects of competing developments of mineral extraction and housing at the same time in a relatively small area.

Similarly, the plan does not explain the implications of the close proximity of the new Garden Village to the settlement of Five Oak Green. Para 5.210 hints at the problem. It mentions local towns but interestingly does not mention the nearby village that will be most affected.

Para 5.212 again talks of addressing the needs of the new community, totally ignoring the needs of the large number of residents in the adjacent/ virtually contiguous Village of Five Oak Green.

Much mileage is made of the sustainability arguments for the New Garden Village. One thing is for sure, that, if today, a sustainability assessment was made for Five Oak Green one would be struggling to produce a positive result. If this new development were to go ahead the position of Five Oak Green would be permanently downgraded, with this village doomed to be the poor relation and dependent on its supposedly vibrant neighbour. It would be much better if some real thought was given to making Five Oak Green into a real sustainable settlement.

TWBC seem to acknowledge the problem (point 7. f of STR/SS3) but do nothing real to address it.

'the design should incorporate means to ensure that there is appropriate visual separation between Tudeley Village and Five Oak Green, including potentially the use of structural planting on land outside the allocation, but within the wider land ownership.'

There are a number of positive aspects in the P-S Local Plan that could be used to mastermind a regeneration of the Village of Five Oak Green which would be welcomed by many residents and might well lead to a sensible level of new additional housing. It is interesting to note that the Housing Needs Study suggests Capel Parish has requirement of 10 new dwellings per year, 150 new homes during the plan period.

- 1 **Heritage Assets** - On a personal note, my wife and I have lived for some 50 years at Tudeley Hall, Hartlake road, a Grade II listed building, which has origins that go back to the seventeenth century. The proposed plan totally engulfs my home on three sides with the increasingly busy Hartlake road in front. As far as I can see no mitigation measures are proposed to reduce the enormous harm that will be done to our environment and our rights to 'quiet enjoyment'.
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In conclusion, I note and welcome (in Para 5.229) that the Council now proposes to work with the local community through the Capel Neighbourhood Development Plan Group, but unless this policy SST/SS3 can be removed from the Local Plan, it will be impossible for them to produce a plan that has the support of the community has the support of the community.

Question 6

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If you would like to attach a file in support of your comments, please upload it here. [P-S Local Plan 030621.pdf](#)

Supporting Information File Ref No: SI_69

Comment

Consultee	Konrad Legg [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Konrad Legg [REDACTED]
Comment ID	PSLP_1159
Response Date	03/06/21 22:02
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.6
Files	P-S Local Plan 030621.pdf (1)
Question 1	
Respondent's Name and/or Organisation	Konrad Legg
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

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Question 6

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No, I do not wish to participate in examination hearing session(s)

If you would like to attach a file in support of your comments, please upload it here. [P-S Local Plan 030621.pdf \(1\)](#)

Comment

Consultee	Jacky Leman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED], [REDACTED] Matfield [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Jacky Leman [REDACTED]
Comment ID	PSLP_1188
Response Date	04/06/21 09:28
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Jacky Leman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Paddock Wood and land east of Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
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Resident of Tunbridge Wells for over 40 years. For 20 years was director of Electronics Development company based first in St Johns area on A26 the relocated to Matfield, 1/2 mile from Paddock Wood.

My main concerns are **traffic**, we live on Gedges Hill, we used to be able to walk along the B2160 road to Matfield. Now the traffic is so busy with large lorries that it is dangerous and we have no alternative to using our car to go ANYWHERE. The existing developments and further developments of dwellings in Paddock Wood will only make this worse as the B2160 is the main route from Paddock Wood to the A21.

Dwellings: The existing 3 developments on Paddock Wood, Foal Hurst Green [Mascalls Farm] Mascals Court off Green Lane and Church Farm will amply provide enough houses for local residents. In addition all over Paddock Wood, **every empty space** is being built on. Existing houses are being knocked down and up to 7 dwellings being built in their place. This is already OVER DEVELOPMENT.

The lack of capacity at doctors surgeries, dentists, schools etc. mean residents are having to travel further away causing more traffic movement.

It is also of concern that :-a] Croyden council is using Paddock Wood to move its social housing tenants to. and

b]The Foal Hurst Green [Mascalls Farm] development is being marketed to Hong Kong for Chinese investors to buy. Does TWBC really want Chinese landlords profiting from houses built on greenfield sites.

Question 6

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or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The developments of dwellings in Paddock Wood area are not sound due to insufficient infrastructure and poor transport links. A much better plan would be to put new developments close to the A21, either Kippings Cross, North Farm or Castle Hill. Of these North Farm would probably be best with nearness to High Brooms station, local employment and good transport links.

Question 7

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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lisa Leslie [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Lisa Leslie [REDACTED]
Comment ID	PSLP_1193
Response Date	04/06/21 10:30
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Lisa Leslie
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

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I am a local resident in Five Oak Green - the area that will be sandwiched between the two proposed developments in the parish of Capel and Paddock Wood. I am also a property expert. I have been a property copywriter and journalist for more than 25 years. Most of those have been spent working alongside housebuilders, such as Berkeley Homes, Fernham Homes, Crest Nicholson and Millwood Designer Homes, so I have a detailed knowledge of how planning, construction, sales and marketing works (I am the former Editor of What House? and Your New Home magazines, working alongside the NHBC for many years). I, therefore, come to this proposal not as a NIMBY but as an educated, experienced property professional.

I am, however, a local resident too - with a young family, a dog and a wonderful village lifestyle. The community here is tight-knit and friendly - we chose this location for its size, nature and ability to nurture our social and mental wellbeing.

I'm going to start with my property observations and an unanswered question - I am still waiting for an answer from the Head of Planning at Tunbridge Wells Borough Council. Who is going to buy these homes? Ahh, said Steve Baughen, there is high demand and people from London will want to buy them. Really? Today, Friday 4th June 2021, I ran a Rightmove search. There are 760 unsold properties for sale that are available within 1 mile of Tunbridge Wells and almost 1,000 are 'for sale' within 3 miles of the town. Additionally, there are 77 homes for rent within 3 miles of Tunbridge Wells. If there is such demand, why are these properties not filled? Why are people not banging on the door and snapping them up? I'm still waiting for Steve Baughen to reply on that matter. Waiting months, over a year in fact. Who cares hey? I'm just a paid up borough resident sending thousands of pounds to fund these people.

The sensible answer to why these properties remain unfilled is because prices are too high. Yes, we are a grammar school county, a green and pleasant county (maybe not for much longer) and a London commuter county. There IS a premium here but in acknowledgment of this, we are admitting that we are pricing locals out of the very homes Harry Teacher/TWBC want to build and he and TWBC are not solving the 'local housing crisis'.

My detailed knowledge of new home pricing strategies means that new homes are priced at a premium - because the builders know people will pay it. Simple as that. Yes, the Tudeley Village plan will attract London folk who are buying with cash, those downsizing from affluent areas, such as Sevenoaks, and there will be the inevitable but hush hush overseas pre-release. Kuala Lumpur, Singapore, Hong Kong. Asian currencies are strong against the pound and investors love the UK's safe-haven status. Please don't forget, I have, myself, helped housebuilders with overseas marketing strategies - it happens and you also know that.

Now onto the matter 'affordable housing? What is in place to ensure that local TWBC residents get priority? I haven't heard or read anything to suggest that borough councils elsewhere - Leeds, Birmingham, Manchester, for example - won't be offered the opportunity to buy the new homes so they can relocate out-of-area social housing residents. And on the matter of affordable housing, there is no such thing. Council houses are no longer built. Help to Build is not affordable either (are you

familiar with the structure of interest on the loan?) and I very much doubt the housebuilders will sell any homes off 'cheap'. In 25 years, I have never met one willing to sell below market value to help Mr & Mrs Smith from the next village get on the property ladder but I do know they locate their social housing quota offsite to not 'spoil' the look and feel of a prestigious development - again, not helping local people in any way. As yet, we have not seen anything that demonstrates a 'local people first' approach to all of the housing, no matter its tenure.

Another cause for concern is the habit of housebuilders to go back in for planning permission time and time again to increase the number of units it builds. We have had no reassurance that there is a fixed cap on the number of homes to be created. Take, for instance, King's Hill in neighbouring Malling. They are still building and the originally published number of new homes has been far surpassed and exceeded over the decades. Where are the cast-iron guarantees that won't happen in Capel/Tudeley? Sadly, many residents will be hoodwinked into thinking the numbers touted now are the final figures. This is usually not the case and 'village' developments turn into towns and then they become small metropolises. I must also add that professional insights prove that building more homes does not reduce the cost of buying a property.

Again, in the case of King's Hill, the development actually carries a premium, further locking out local people. I am happy to put you in touch with a local estate agent who is responsible for selling hundreds of homes in King's Hill as he has access to real-time and historical property price data. And if you are unfamiliar with King's Hill, please watch the Grayson Perry documentary about the location - he reveals the rather peculiar and not very inclusive nature of the place. In addition, I don't have to mention Poundbury to you - we all know that Harry Teacher thinks of himself as Prince Charles.

My neighbours and fellow parish resident will eloquently present facts, data and case studies on matters of ecology, historical preservation, flooding, air quality, traffic, infrastructure, loss of greenbelt/productive farmland, AONB setting, coalescence, heritage, environment, biodiversity, water supply & sewerage, lack of engagement with the public response to Reg 18, site alternatives & brownfield sites not prioritised.

I must also mention the convoluted and downright tricky system that people have to navigate to make a representation - it's almost as if you don't want locals to have their say when it really matters. I do, however, want to end with these bullet points:

- . My road and garden have flooded recently. My neighbors and friends have flooded inside their homes so badly they have lost everything and have had to live elsewhere for over a year while their homes were rid of human sewage and brown, contaminated mud. My lovely local businesses have been forced to shut and clean up. Any loss of trees and fields will condemn us to more flooding. If you can't imagine what this is like, I'm happy to slosh the contents of my lavatory and garden around your living room and kitchen - all while you're at home in the pitch black with no electricity.
- . Our ecology here is precious. We are now charting stork sightings in the parish - a super rare bird that is carefully being reintroduced to the UK. They have chosen Capel Parish - please don't put their release and breeding program at risk.
- . Mental health and wellbeing is supercritical. This plan will subject us, our children and our grandchildren to a hideous environment with disruption, pollution and destruction for an untold number of years - decades probably. On this point alone, the plan is flawed. How can we be encouraged by the Government to take walks, open our windows for ventilation, exercise and get in touch with nature when TWBC are set on covering everything with concrete?
- . The local plan is inaccurate. They keep including a train station when all of the rail operators and rail partners have categorically stated there will not be a station in Tudeley. If this is a false representation within the plan, how are we to believe anything it contains? Can you, as the inspector, believe what you are reading too? Please stop and think about the brains behind the plan. Hand on heart, the masterplanners are not local to the parish, to Kent or even to the UK.
- . The consultation process was woefully inadequate. The 'roadshow' was held outside of the village and even outside of the parish, making it very difficult for people to attend. They should have come directly to the parish with their displays. I firmly believe TWBC also used Covid to make the comments, feedback, dialogue, consultation and response process pretty much inaccessible for everyone. How convenient we could **NOT** meet with people from the council, could **NOT** meet as a community and could **NOT** demonstrate about the plan. What a well timed pandemic. It's a smug convenience for TWBC, especially as many residents affected are elderly or not familiar with the complex planning process or online systems. I can categorically say there are many

people here who will not even know about the masterplan, let alone logged on online to make a representation.

Thank you if you have managed to get this far but this is a matter I and my fellow residents feel strongly about and we ask you to consider the impact and alternatives. There are other sensible options to explore.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Dr & Mrs David & Jane Lloyd [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dr & Mrs David & Jane Lloyd [REDACTED]
Comment ID	PSLP_934
Response Date	01/06/21 15:28
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	David & Jane Lloyd
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR/SS1 and STR/SS3 – see Comment Numbers PSLP_927 and PSLP_934]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I find that this pre-submission local plan is not legally compliant because it has not been fully consultative and democratic. TMBC have set out how they have followed the mechanics for consultation with provision for informing the public and answering questions, however, in the midst of a pandemic with enforced social distancing, when gatherings and face-to-face meetings are not allowed by law, there is no possibility of a normal community meeting.

These proposals for the extensive new development in Tudeley and Capel make huge and sweeping changes to the lives of the rural community and beyond, and should be fully exposed and debated, not passed after two months, when individuals are forcibly isolated and cannot meet as a community.

Inevitably, the lack of normal debate discriminates unfairly against those who do not have access to a computer and the internet. Neither does the pervasive news and events surrounding the pandemic allow the mental space to give TWBC planning issues a reasonable airing. People facing life-and-death worries about their elderly relatives, their own jobs, mental health and getting their family vaccinated, can find it impossible to focus and engage with responding to TWBC proposals, which on paper will seem very remote from their everyday lives, or very daunting. Being advertised in a circular, or exhibited in a Town Hall is not the same as public engagement through meetings; other measures are second-best and inadequate. Hence running this Regulation 19 consultation at this time is unfair and undemocratic.

One cannot escape the fact that language of the Local Plan increases obfuscation. It is not designed to aid transparency and help the public understand the Plan; I offer the example below:

"Within the context of a long-term vision and related objectives, it [the plan] comprises overarching strategic policies, including a new development strategy, supported by both place-specific local strategies and site allocations, and generic policies on a range of topics." (From front page of pre-Submission Local Plan website)

TWBC does not demonstrate commitment to listen to the public's views even when they speak clearly.. In the huge response to the Regulation 18 consultation, (800 or so respondents), approximately one third of these objected to the CA1 Policy to create a 'Tudeley Garden Village' development. However, when the revised 'pre-submission local plan' finally emerged in March 2021, these objections had not been taken on board and nothing had changed; alternatives were not considered.

The public's hostility to their Council's plans was demonstrated in this year's May local elections, when the Conservatives lost seats and so lost their overall control of Tunbridge Wells Borough Council. I urge the Planning Inspector to take this opportunity to recognise the public's reasonable and legitimate objections to these proposals, building over Green Belt farmland.

The Plan may not be consistent with National Policy in the post-Covid era (see Robert Jenrick, 16 December 2020)

We understand that the Government has modified its policy on national targets set for housing. The Secretary of State, Robert Jenrick, has clarified that the numbers are not set in stone, but should be applied using local understanding. This seems to recognise that in the south-east, many areas are already highly developed, and the Green belt is limited and valuable, and in these situations the use of brown-field sites and in urban centres is preferable. TWBC has failed to take this advice on board, and is set on meeting full housing targets, in a blunt and cack-handed way, even when their proposed housing numbers may not be required, and are at an environmental price that is too high.

This Local Plan is unsound because it is not justified

This Plan is unsound because it cuts across Green Belt policy for no good reason. The siting of the new development is not based on sound planning – it seems opportunistic, based on one landowner who is willing to sell.

a) To build this development, the Plan envisages de-designation of 407 hectares of green belt countryside on the High Weald across Tudeley and Capel, used for arable farming. The outstanding features of the area are described in the Local Plan in 5.262

The southern part of the parish is located within the High Weald AONB. There are significant areas of ancient woodland, areas of archaeological potential, historic parks and gardens (Somerhill School and the Postern), a Scheduled Monument (Castle Hill Iron Age Hill Fort), and ecological/wildlife designations (Tudeley Woods, Somerhill Park, parts of East Tonbridge Copses and Dykes and River Medway) across the parish.

The reasons are not justifiable for de-designation of the Green Belt in this spectacular area adjoining Tonbridge. There exist no 'exceptional circumstances' that justify this. It will create one urban sprawl, by enlarging villages between Paddock Wood and South Tonbridge (Tudeley, Capel, Five Oak Green) over a period of time, (see figures in the Plan) effectively creating one long suburb between Tonbridge and Paddock Wood. This is totally against the principle on which the Green Belt was founded: to maintain boundaries between town and countryside – and thus give town-dwellers ready access to the countryside.

b) It is not justified because there are better alternatives closer to existing development. Alternative sites been proposed, (such as land near the A21 corridor, or at Castle Hill), but do not seem to have been seriously investigated by TWBC. By adopting a more distributed approach to development, by building smaller developments across the whole Borough, there would be less dislocation of existing communities. Services could be more easily provided and new housing developments more easily absorbed.

c) TWBC have not justified their approach by seeking the co-operation of TMBC, (the adjoining authority), or by adequately considering the impact on Tonbridge. TWBC has put 'Tudeley Garden Village' at a comfortable distance from Tunbridge Wells, at the far end of its own territory and it has not thought through the real world implications of the scheme, of the disruption to existing commuter and traffic flows, and the services that would be required by a new population of this size.

The site it has chosen is geographically anomalous, because it is only 2 miles distant from Tonbridge and 6 miles distant from Tunbridge Wells. The existing village of Tudeley has its closest links to Tonbridge (pre-1972, it was part of Tonbridge Borough Council). This proposed new development has huge implications for Tonbridge which have not been adequately considered. The greatly increased traffic flows into Tonbridge resulting from 4000 new houses will have a huge impact on Tonbridge, and big implications for Kent County Council highways provision (but would scarcely affect Tunbridge Wells).

d) This approach by TWBC to fulfil its housing target seems unsound and unbalanced. Now national policy seems to recognise that in the south-east, many areas are already highly developed; that the Green belt is limited and valuable, and in these situations the use of brown-field sites and in urban centres is preferable. (Jenrick, 16 Dec 2020) TWBC has adopted a blunt and simplistic approach in its interpretation of national policy, by calculating the maximum number of houses it should build over the stated period, and have made a decision to build the majority in one place, to create 'Tudeley Garden Village' or 'New Town'.

e) Taking into account the points above, I think this Green Belt site has not been chosen for sound planning reasons, but rather, for opportunistic reasons. The site offers TWBC a straightforward negotiation with a single landowner, the owner of the Hadlow Estate. Because it is a greenfield site it will be attractive to developers, and present few problem for builders, and substantial profits. Unfortunately, it takes little account of the impact on lives of residents in this part of Kent – not just in these villages directly affected, but also in adjoining villages along the access roads - and in Tonbridge, where I live. These impacts have not been included in the costings.

The Local Plan, with specific reference to 'Tudeley Garden Village' is unsound and not effective - because the finer detail has not been adequately evaluated. Costs should be included of mitigating adverse effects (flooding, air pollution, loss of habitat and bio-diversity) and supplying new infrastructure. Much of the loss is irreplaceable: for example, the heritage value of views over Kent countryside and oast houses from All Saints Church and churchyard, Tudeley (with its Chagall stained glass, drawing visitors from over the world.) There is the amenity value of the network of woodland and footpaths, that has proved so essential to personal well-being during the Covid crisis, and the dark skies, lost to fluorescent street lighting and traffic signals.

The costs of creating a New Town (next to Tonbridge) have been glossed over and not factored in: provision of infrastructure and public services; the costs of flood protection, utilities, water and sewerage and improving roads and parking, and schools, leisure and health facilities. A sizeable portion of these indirect costs will fall on Tonbridge as it is the nearest major town offering a range of services and a station to London. TMBC will not automatically receive any council tax from the new residents to offset these costs.

Train services in Tonbridge and associated parking are already at capacity. Details need to be supplied from the Railway Authority as to how these rail needs will be met, and also from Kent County Council, regarding upgrading the road network. More traffic will generate higher air pollution, that also has a health cost. Tunbridge Wells already is the borough with the 8th worst level of air pollution in Kent, which is poor for a mostly rural area. (NB. It seems a forlorn hope that Tudeley will have a new rail station, with only a 7 minute journey time now between Tonbridge station and Paddock Wood.)

As an example of a unfactored impact on Tonbridge, we can use our own road, Goldsmid Road, which will be a main carrier of additional traffic from Tudeley to the town centre and Tonbridge station. It already has commuter traffic and school traffic at peak times contributing to congestion and air pollution in the road - and there are 4 schools within half a mile with many pedestrians. Parking either side of the road makes for bad visibility; in addition, a narrow one-way tunnel at the bottom adds to the congestion, as do large vehicles, such as school buses and 'bin lorries'. This situation will be made much worse by additional traffic from 'Tudeley Garden Village' but this has not been taken into account.

TWBC give no evidence of carrying out the 'Duty to Co-operate'

In this proposal to build a 'New Town' of 4000 or more houses, it would be expected that TWBC, would prepare the ground by consulting and co-operating with the neighbouring Borough Council, Tonbridge and Malling who are closest to the new development and will bear the impact (see discussion of this above). To my knowledge, no overtures of co-operation have taken place. The same 'duty to co-operate' should be applied to co-operating with Network Rail and the train operators, as here, there will be a major impact; also more co-operation is needed with Kent County Council, regarding the road network, where guarantees are needed that the necessary infrastructure will be put in place. No details on this are given in the Local Plan.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 Any decision on STR 1 and STR 3 (Tudeley and Capel) in this Local Plan should be postponed until further evaluation of requirements and impact costings has taken place and until further data is available. The response of TMBC is essential and should be a central part of the process. Also further details need to be made available from KCC on provision of a road network; also a response from the Rail authority is needed on what rail provision will be made.
- 2 Numbers of dwellings required should be re-evaluated in the light of latest Government policy and revised down if possible, recognising this area is already highly developed.
- 3 More alternative housing options should be explored to meet housing needs. These should include more distributed development and brownfield sites, and development of existing urban centres, such as Paddock Wood. The enlargement of Tudeley and Capel should be abandoned.
- 4 We have argued above that the consultation process during the pandemic has been essentially undemocratic. When further information is available, and society returns to its normal arrangements, the consultation should be set up to run again, on the basis of a revised Plan.
- 5 TWBC should publicly accept the intrinsic importance of Green Belt land adjoining Tonbridge and recognise its value in the post-Covid era for the contribution it makes to bio-diversity and people's mental health.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_111

Comment

Agent	Mrs Alex Jones [REDACTED]
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Address	7 Soho Square London W1D 3QB
Consultee	Mr David Wells [REDACTED]
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Address	Hermes House St John's Road Tunbridge Wells TN4 9UZ
Event Name	Pre-Submission Local Plan
Comment by	Logistics UK [REDACTED]
Comment ID	PSLP_1865
Response Date	04/06/21 12:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	PSLP_1855, 1864-1867 Barton Willmore for Logistics UK SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Logistics UK
Question 2	
Agent's Name and Organisation (if applicable)	Barton Willmore LLP
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Section 5 - Royal Tunbridge Wells, Policies ED 2, STR/SS 1, STR/SS 3 and STR/RTW 1– see Comment Numbers PSLP_1855, PSLP_1864, PSLP_1865, PSLP_1866 and PSLP_1867. The full representation has been attached as Supporting Information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

TWBC LOCAL PLAN REG. 19 REPRESENTATIONS

HERMES HOUSE, ST JOHN'S ROAD, ROYAL TUNBRIDGE WELLS

1.0 INTRODUCTION & OVERVIEW

1.1 These representations are made on behalf of Logistics UK in respect of their headquarters at Hermes House, St John's Road, Royal Tunbridge Wells TN4 9UZ and the land to the rear ('the Site': see Site Location Plan (drawing reference 2104/FS/001) enclosed at Appendix 1) and are submitted to the Regulation 19 consultation on the emerging Tunbridge Wells Borough Council ('TWBC') Local Plan (Pre -Submission Local Plan, undated).

1.2 The Site currently comprises offices in employment use (albeit currently only sparsely / rarely occupied) with associated car parking, accessed from St John's Road, and an area of grassland to the rear. The Site is not located within a conservation area and there are no known designated or

non-designated heritage assets on or in proximity. The Site falls within Flood Zone 1 and is not known to be subject to any ecological designations.

1.3 Logistics UK have occupied Hermes House since 1975. The older building on site is understood to have originally been constructed as church and used for religious purposes before being converted to offices. It has an unusual circular plan form that does not lend itself to modern office use and results in inefficient use of the space, both in terms of the area of unused space and the ability to lay out the useable space in a manner conducive to modern working practises. Moreover, Logistics UK run training and conferencing events from Hermes House which again does not lend itself to this purpose owing to the number of structural supports/ columns.

1.4 An extension was constructed in the late 1980s to provide two floors of office accommodation on a more regular plan form. Whilst at the time the extension functioned well it is now dated and requires significant upgrade works including replacement of all windows, a new heating system and air conditioning. There are also difficulties providing heating and cooling across the two elements of Hermes House as both differ significantly in their construction and design. This creates further inefficiencies.

1.5 A number of Logistics UK's staff travel to work by train. Hermes House is accessible by car but is some 1.8 km from the nearest train station (Tunbridge Wells) and is located outside of designated town centre/ employment areas. The Site is not in a sustainable employment location. Moreover, it is located in a predominantly residential area where adopted and emerging policy would resist new employment uses owing to the impact on residential amenity, issues of neighbourliness and incompatibility of land use.

1.6 As a result of the poor quality of the existing employment accommodation and its poor public transport accessibility and location within a residential area, Logistics UK has been planning to vacate Hermes House and relocate to a more appropriate premises and location within Tunbridge Wells. This process has been expedited owing to the pandemic and shift to a greater proportion of staff working from home thus requiring a smaller area of employment floorspace in any event.

1.7 Given the location of Hermes House in a residential area, residential has been identified as the most appropriate and compatible use moving forward. Moreover, TWBC has been unable to demonstrate a five-year supply of housing land for the most recent monitoring years and has a worsening Housing Delivery Test score despite having an Action Plan in place. The emerging Local Plan provides the opportunity to address the current and historically poor housing delivery in the Borough. However, the heavy reliance of the emerging Local Plan on two large strategic sites to meet almost 75% of its housing need over the Plan period is a high-risk strategy. Moreover, delivery of new homes on these strategic sites is not anticipated for four years (in our view at the earliest). The Council should, therefore, seek to allocate additional small/ medium scale sites for residential development to address historically unmet need, provide fluidity in five -year housing land supply and ensure short -term delivery of homes to mitigate the risk of delays from the strategic sites.

1.8 There are Borough-wide benefits of including additional site allocations that are deliverable in the first five years of the Plan. There are also local benefits to Royal Tunbridge Wells which has relatively few proposed site allocations that are expected to yield new homes in the initial five year period. A steady supply of new homes is required in key settlements to provide choice and variety in the market and to mitigate against increasing issues of affordability. The Council should consider additional residential allocations in Royal Tunbridge Wells that are deliverable in the short-term to maintain a steady supply of new homes in this principal settlement.

1.9 In addition to the above, allocation of a previously developed site in an established urban area such as Hermes House reduces the pressure on greenfield development and reduces the need for Green Belt release. NPPF paragraph 137(a) requires LPAs 'to make as much use as possible of brownfield and underutilised land' before concluding that exceptional circumstances exist to justify release of land from the Green Belt for development. Hermes House is a brownfield, underutilised site and whilst this Site alone would not remove the need for some Green Belt release to meet TWBC's housing needs, it ought to be considered as an option for allocation before Green Belt sites in the sequential approach to identifying land to meet residential development needs through the emerging Local Plan.

1.10 Redevelopment of Hermes House alone would yield relatively few dwellings. As such Logistics UK has also reviewed the potential of the land immediately to the rear. The land to the rear is currently in educational use but does not serve a specific educational or recreational function, nor has it been

identified as a suitable location for future educational development being distant from the main school campus. In short, this area of land forms part of the school grounds but is incidental to the educational/ recreational function of the school.

1.11 The Site has an area of approximately 0.65 hectares. A capacity study (enclosed at Appendix 2: drawings reference 2104/FS/010) indicates that circa 48 homes could be accommodated at a density of 74 dwellings per hectare. Combining Hermes House with the land to the rear allows the number of new homes to be optimised and also for a more varied mix of homes of different sizes suitable for a range of households (including apartments and houses) in addition to a greater number of affordable homes.

1.12 The Hermes House part of the Site currently falls within the Limits of Built Development as per the Policies Map (2016). The Council has imposed Article 4 Directions on a number of existing employment buildings to prevent them from changing from office to residential under current Permitted Development regulations. These 'protected' employment buildings are largely those falling within accessible town centre and/ or established/ designated employment locations. Hermes House falls within a solely residential area and has not been 'protected' through an Article 4 Direction. Subject to meeting the requisite criteria, Hermes House could therefore be converted to residential. However, as set out above, the, inter alia, awkward plan form, inherent issues with heating and cooling and poor standard of the building would make for poor/ substandard homes which prevents this from being an option.

1.13 The southern part of the land to the rear also falls within the Limits of Built Development with approximately 0.15 hectares falling outside and within the area currently designated as Rural Fringe.

1.14 Logistics UK consider the Site to be ideally placed to deliver a range of high -quality new homes in an established residential area, with only a minor adjustment to the existing boundary of the Limits of Built Development required to facilitate this. It is Logistics UK's position that the Site should be included within the emerging Local Plan as a residential site allocation to deliver circa 50 new homes. The Site is deliverable in the short -term and will assist in diversifying the type and scale of site allocations thus reducing reliance on large -scale strategic allocations that require significant new infrastructure and risk delay, with the consequential impact on housing land supply and delivery.

1.15 The Site is deliverable in the short -term as per the NPPF definition (Annex 2):

'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years'

1.16 The Site comprises previously developed land (Hermes House) with very little landscaping and mown/ managed grass on the land to the rear. There is very limited ecological potential with no trees/ hedges that would pose a constraint to development as proposed. There are also no national designations that would impede the development such as Green Belt, flood risk or heritage. Access is established from St John's Road.

2.0 CURRENT USE

Employment

2.1 Hermes House was converted from its previous religious use to offices prior to Logistics UK's occupation. The older building has an unusual circular plan form and includes an amphitheatre - style space. This space has historically served a function for seminars/ conferences but the structural supports/ columns are not ideal for this purpose and the resulting office floorspace is awkward and inefficient and cannot be considered to provide modern, functional or flexible office accommodation.

2.2 In an attempt to improve the quality of the employment accommodation on site Logistics UK constructed an extension in the late 1980s (LPA reference 84/01473/FUL) facilitated by the demolition of a residential property. Whilst providing a more regular plan form, this extension is now over 25 years old and requires significant upgrade works to allow it to continue to function as office floorspace. For example, the large areas of glazing make the space too hot in summer but too cold in winter. The extension does not benefit from air conditioning and the heating system is inadequate. Both are required along with new windows. However, there are inherent difficulties providing heating and cooling systems to serve the older part of the building and the extension. This further adds to the inefficiency of the current buildings.

2.3 In addition to the above, Hermes House is located in a predominantly residential area outside of a designated town centre and employment location. It is accessible by car but some 1.8km from Tunbridge Wells train station. Several members of staff travel to work at Hermes House by train, a proportion that Logistics UK consider would be higher if the offices were located in a more convenient location in proximity to the train station.

2.4 There is also the issue of compatibility of land use. Hermes House is surrounded on three sides by residential properties, being located on a residential road in a predominantly residential neighbourhood. Logistics UK runs software that requires a constant (24/7) power supply and generators. Care is taken to minimise noise from the generators but they are not ideal in a residential area. Moreover, the heating and cooling systems required to address the inherent issues with the current buildings and allow the employment use to continue will further add to the noise emitted. These issues, coupled with vehicle movements, staff outside use (including from the smoking shelter) and the types and scale of signage required, are present with the existing employment use and any likely future employment use.

2.5 It is on the basis of the above that Logistics UK consider that Hermes House should be returned to its former residential use as this would be more compatible with the established residential use and character within the area. Moreover, in line with adopted Core Strategy (2010) Core Policy 7, employment uses, particularly of the scale of Hermes House, are more appropriately sited in sustainable and accessible town centre and employment locations.

Education

2.6 Approximately 60% of the land to the rear of Hermes House is located outside of the Limits of Built Development and within the Rural Fringe, with the southern portion (circa 40%) within the Limits of Built Development. It is all within educational use forming part of the grounds of an neighbouring school.

2.7 This land has been included within the Site as it forms a logical extension to the Hermes House site and allows for an improved residential layout that facilitates the delivery of a higher number of homes that includes a greater variety of homes of different sizes (including apartments and houses) and a higher number of affordable homes.

2.8 Whilst this land is within educational use, it does not have a defined educational or recreational function. It is laid to grass and forms an incidental part of the wider school grounds. When the school has previously expanded this land has been reviewed as an option but discounted owing to its location remote from the main core of the school. It is also not easily accessible from the public highway (although it would be accessible from St John's Road through Hermes House if the sites were to be combined as proposed). In short, this land does not form a specific educational or recreational function and it is Logistics UK's position that it would be an appropriate location for small-scale residential development.

3.0 CASE FOR RESIDENTIAL

Historic Supply/ Delivery of New Homes

3.1 TWBC has a published shortfall in five-year housing land supply (Monitoring information (tunbridgewells.gov.uk) [accessed 01/06/2021]) and at 1 April 2020 could only demonstrate 4.83 years supply (see Five-Year Housing Land Supply 2019/20). This was based on a 5% buffer. However, given that TWBC's previous Five -Year Housing Land Supply 2018/19 report also identified a shortfall (4.69%: see paragraph 12), NPPF paragraph 73 would previously have indicated that a 20% buffer is appropriate. This has subsequently been superseded by the Housing Delivery Test whereby the 20% buffer is to be applied to LPAs with a Housing Delivery Test score of 85% or below.

3.2 TWBC has a published score of 86% in the Housing Delivery Test for the period 2016/17 to 2018/19 (Monitoring information (tunbridgewells.gov.uk) [accessed 01/06/2021]) (published February 2020). Whilst 1% higher than the threshold for the 20% buffer, TWBC has failed to meet or exceed its housing requirement for two of the three monitoring years that have informed the Housing Delivery Test result. The one year it did exceed it was when the housing requirement was notably lower owing to the method of calculation (pre -Standard Method). Moreover, the 2021 Housing Delivery Test results see TWBC's score reduce to 85% (Housing Delivery Test: 2020 measurement - GOV.UK (www.gov.uk) [accessed 01/06/2021]) thus housing delivery is worsening in the borough and the 20% buffer (NPPF paragraph 73) should be applied to the calculation of five-year housing land supply. This places even greater pressure on TWBC to identify additional land for residential development.

Proposed Supply of New Homes

3.3 The emerging Local Plan utilises the Standard Method figure of 678 homes per annum (Pre - Submission Local Plan paragraph 4.10) from which to establish the number of homes to plan for. The Planning Practice Guidance ('PPG') is clear that the Standard Method provides a 'minimum annual housing need figure' (PPG paragraph: 002 Reference ID: 2a -002-20190220) and a not a housing requirement figure. Whilst there is acknowledgement within the emerging Local Plan that exceptional circumstances do not exist to deviate from the Standard Method (paragraph 4.9 and 4.11) i.e. to provide for a lower number of homes, and that TWBC may need to consider taking unmet need from neighbouring authorities (see paragraph 4.13), there does not appear to have been an attempt to identify whether it would be appropriate to actively plan for a higher housing requirement.

3.4 The emerging Local Plan has been developed on the basis that site allocations to deliver some 6,900 additional homes will be required (paragraph 4.17) (albeit the Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan (February 2021) states that the Council must plan for a minimum of 7,221 homes through site allocations (paragraph 5.4). We have not interrogated the assessment that underpinned this conclusion (nor the discrepancy between the Topic Paper and Pre-Submission Local Plan). However, the emerging Local Plan is clear that this is based on the assumption that 'all previous allocations are still suitable and developable' (paragraph 4.17). In reality this may not be the case and the emerging Local Plan should actively seek to progress additional site allocations. Moreover, pursuant to the PPG, the Standard Method should be treated as a minimum figure. Thus, whilst the emerging Local Plan identifies site allocations capable of delivering between 8,076 and 8,461 homes over the Plan period (see Table 4), this may not be enough to provide for the housing required.

3.5 The historically poor housing delivery (as evidenced by the Housing Delivery Test) in the Borough and failure to maintain a five-year housing land supply should also be factors that weigh in favour of the identification of additional housing allocations to come forward in this Local Plan.

3.6 It is also noted that, whilst Royal Tunbridge Wells has 18 draft residential site allocations within the Pre-Submission Local Plan (see Section 5), the Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan (February 2021) identifies very few homes being delivered within the current five-year period (see Table 9, pages 29/30). This risks an undersupply of new homes in Royal Tunbridge Wells which will serve to drive up already high house prices. There would be merit in identifying additional site allocations, such as Hermes House, that are deliverable in the short term and can assist in providing consistent delivery of new homes in the Borough's principal settlement over the Plan period.

Strategic Allocations

3.7 The reliance of the emerging Local Plan on large-scale, strategic allocations is also of concern. Approximately 6,300 homes are identified as coming forward from two strategic allocations: approximately 3,500 homes at Paddock Wood/ East Capel (draft Policy STR/SS 1); and approximately 2,800 homes from a new settlement – Tudeley Village (draft Policy STR/SS 3). This represents almost 75% of all new homes planned for through the emerging Local Plan (taking the upper range provided at Table 4; 78% if taking the lower range). There is, therefore, significant reliance on the delivery of new homes from these two strategic sites.

3.8 It is common for it to take some time to see homes delivered on large -scale, strategic sites owing to, inter alia, the complexity of the planning process, landownership and often significant new infrastructure requirements. In the case of the proposed allocations at Paddock Wood and Tudeley Village this includes new schools, neighbourhood centres, employment and sports, health and community facilities. Moreover, Framework Masterplan SPDs are requirements of the draft policies, to be adopted in advance of planning permission being granted, which will add significantly to the overall planning process. Furthermore, the use of Compulsory Purchase Order powers is referenced in both allocations indicating anticipated issues with landownership.

3.9 The Housing Supply and Trajectory Topic Paper for Pre-Submission Plan (February 2021) identifies delivery of homes from both strategic allocations from 2025/26, with 300 homes completed per annum from Paddock Wood/ East Capel and 150 from Tudeley Village (see Table 9, page 30). Given that Framework Masterplan SPDs are required before planning permission can be granted, it is already halfway through 2021 and significant infrastructure is required to 'unlock' the sites, delivery of homes from these allocations within the next four years is ambitious. Delivery of 300 homes in the first year from Paddock Wood/ East of Capel is very ambitious, as is 150 from Tudeley Village.

3.10 Whilst it is accepted that strategic allocations are required to meet longer term and large -scale housing needs, the emerging Local Plan ought to be realistic as to when and how many homes can be expected from these sites. Further, it should seek to identify a large number and range of small to medium sized allocations to provide for local housing needs and a consistent supply of new homes to account for the risk of delays from larger allocations. Placing such reliance on the delivery of homes from only two strategic sites is a high-risk strategy that could see the historically poor delivery of homes in the Borough continue and/ or worsen.

4.0 SITE ALLOCATION

4.1 Hermes House and the land to the rear ('the Site') provides an opportunity for an additional residential site allocation in Royal Tunbridge Wells within the emerging Local Plan. The Site has not previously been submitted to a Call for Sites and is not included in the Strategic Housing and Economic Land Availability Assessment (January 2021). The previous Call for Sites were held in 2016 and 2017 which was prior to Logistics UK considering relocating to a more appropriate site within Royal Tunbridge Wells.

4.2 For the reasons outlined above, Hermes House is not considered an appropriate employment location and has not been protected by the Council from changing use to residential, albeit this is not a feasible option given the inherent issues with the current buildings. Additionally, the land to the rear does not provide an active educational or recreational function and, if included with Hermes House, could provide a logical extension to the built -up area to create a high-quality residential development that delivers much-needed new homes in the short -term.

4.3 The Limits of Built Development boundary would require a minor adjustment to include that part of the land to the rear of Hermes House that currently falls outside. This area of land is surrounded on three sides by the current Limits of Built Development (i.e. it is inset) and the realignment of the boundary in this location would result a in logical 'squaring off' of the boundary with very limited visual impact.

4.4 Vehicular and pedestrian/ cycle access to the Site would continue to be taken from St John's Road from the existing or a relocated single access point.

4.5 It is envisaged that building heights will reflect the prevailing residential heights within the local area.

4.6 The homes would be provided as a range of private and affordable tenures and across a variety of dwelling types and sizes to cater for a wide range of households.

4.7 The suggested provisions of a site allocation for this Site are as follows:

Land at St John's Road (Hermes House)

This site, as defined on the Royal Tunbridge Wells Policies Map, is allocated for residential development providing approximately 50 dwellings, of which 30 percent shall be affordable housing.

Development on the site shall accord with the following requirements:

- 1 Vehicular access, delivery and servicing should be provided from St John's Road.**
- 2 Provide a landscaped boundary to the new Limits of Build Development.**
- 3 The design shall include appropriate measures to address the impact of the proposal on the gardens of neighbouring residential properties on St John's Road.**
- 4 Provision of on-site amenity greenspace/ high-quality landscaping.**

5.0 EMERGING POLICY MAP/ POLICIES

Limits of Built Development

5.1 Current adopted policy (Core Policy 2) seeks to protect the Rural Fringe from development with this land only released through adoption of a development plan document (i.e. site allocations DPD). The emerging Local Plan does not seek to take forward the Rural Fringe designation which Logistics UK supports. However, part of the land to the rear of Hermes House would remain outside of the Limits of Built Development. This land is inset from the boundary of the Limits of Built Development and adjustment in this area would represent a logical 'squaring off' of the boundary. This would have very limited visual impact given the small scale of the adjustment but would optimise the delivery of new homes in a high-quality development to meet local needs for homes of different types, sizes and tenures.

5.2 We suggest that the Limits of Built Development boundary should be adjusted to reflect the western extent of the Site boundary as shown on the Site Location Plan (drawing reference 2104/FS/001).

Employment

5.3 The emerging Local Plan (draft Policy ED 2) seeks to protect existing employment buildings/ sites regardless of their location and compatibility with neighbouring properties. It is our position that this is a failing of the emerging policy. Not all existing employment buildings/ sites will be appropriate for this level of protection (for example, Hermes House) and the policy should not assume this to be the case. Express wording is required to acknowledge this situation and allow for change of use away from employment -generating use where this is not appropriate owing to reasons of, inter alia, neighbourliness, residential amenity and compatibility of land use.

5.4 NPPF paragraph 81(d) requires planning policies to 'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances'. As drafted Policy ED 2 provides a rigid policy framework in respect of existing employment sites/ buildings with blanket protection that takes no account of local circumstances and does not provide flexibility for businesses to adapt and evolve. This conflicts with NPPF paragraph 81.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To debate the issues with such heavy reliance upon housing delivery from just two sites.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_47

Comment

Consultee	David Lovell [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED], Five Oak Green Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	David Lovell [REDACTED]
Comment ID	PSLP_833
Response Date	01/06/21 14:54
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Development Map of Capel.docx
Question 1	
Respondent's Name and/or Organisation	David Lovell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	Policy STR/SS3 - Strategy for Tudeley Village
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

- Do you consider that the Local Plan is not sound because:
- . It is not positively prepared
 - . It is not effective
 - . It is not justified
 - . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

General Comment

I am a resident of Capel, living in Five Oak Green between the two strategic sites proposed for this rural parish. I live here because of the beautiful countryside, the historic landscape, a closeness with nature and wildlife, and being part of a small close-knit community. All of that, and more, will disappear if TWBC get their way with their lop-sided plans for the area.

My background is in law enforcement. I worked for the Home Office in the UK and abroad for many years, before retiring from the National Crime Agency in May 2019, the month Capel learnt of the shocking proposals in the Local Plan. I have been involved with the Save Capel campaign since then, and as Chair from December 2019 to February 2021. I take an active role in the Biodiversity Team and have made a comment below.

However, with my past in law enforcement, I am concerned by some aspects of TWBC Planning Services' activity during the planning process. Rather than a review of evidence leading to a conclusion, evidence appears constructed or omitted to support a pre-determined conclusion. I have noticed inconsistency, a lack of evidential disclosure and a disregard of public opinion, and therefore intend to focus on my concerns relating to process.

But, to be clear, I object strongly to the Local Plans for Tudeley and East Capel which are unbalanced, ill-considered, deeply unpopular, unsustainable and, I believe, unsound. My reasons follow below.

National Policy

The sites at Capel and Paddock Wood have been pursued by TWBC Planning Services as their desired strategic options for the Local Plan since at least early 2019, however unsustainable or unpopular those options transpire to be. The effort to justify that pursuit might help to explain the volume of inconsistent decisions, misleading statements, a lack of key assessments, and a disregard of public opinion and the intentions of the NPPF. This is not a complete list:

- . Despite often quoted in the Local Plan, the NPPF has been ignored or twisted to suit the pre-conceived solution to the Borough's housing needs through development of the green belt at Capel.
- . The NPPF states brownfield sites should be developed first and greenfield as a last resort, but the Local Plan's primary focus is greenfield. The AONB and its setting are key, but Tudeley borders the AONB and is intrinsic to the setting between high and low weald. Flood zones should be avoided, and yet Tudeley, East Capel and Paddock Wood are adjacent to, or in a flood zone.

The green belt should be preserved; but the plan undermines it, creating an urban sprawl from the edge of Tonbridge, merging Tudeley and Five Oak Green with Paddock Wood.

- . The town of Tunbridge Wells itself is economically stricken; streets are strikingly full of closed shops and empty offices and, with the move to home working and internet shopping, that situation can only get worse. However, rather than take the opportunity to focus on a post-pandemic world and urban regeneration, the Local Plan continues with a backward-looking focus on greenfield development and environmental damage.

Inconsistency

To reach their desired conclusion, the Council has led itself into a maze of contradiction. Reasons for rejecting one site often pertain to another site that is selected, and sites that are selected appear more unsuitable than others that have been rejected. At best, this is a lack of communication between officers, at worst evidential manipulation:

- . Many smaller sites have been rejected as impinging on the Green Belt, even within Capel, but the two sites that will erase the Green Belt in the area have been accepted. Equally, sites in the AONB have been accepted, but not that at Castle Hill (submitted as an alternative to Tudeley and supported by Save Capel) despite its obvious sustainability advantages. Sites adjacent to or in a flood zone have been rejected, but significant flood risk has also been put aside for the strategic sites. To the lay person this looks like double standards.
- . Despite TWBC's oft-repeated claim that removal of Green Belt is justified as the Borough is restricted by designated land, **over 25% of the Borough is undesignated**. Very little development is taking place in this area. The 'very special circumstances' for Green Belt removal appear to be simply 'that's where we want to build.'
- . A primary purpose of the Green Belt is to prevent urban merger, which is precisely what will occur if the proposals across Capel proceed. The David Lock Associates (DLA) report admits there will be 'perceived' coalescence with the expansion of Paddock Wood at East Capel and Five Oak Green (FOG) / Whetsted in Capel, and STR/SS3 states the Tudeley site is close to Five Oak Green '...but physically separate...' **That separation is one field to the south, which will be carved open by the proposed FOG by-pass**. An urban sprawl will be created from Paddock Wood through FOG and Tudeley to the doorstep of Tonbridge, effectively removing the Green Belt.
- . Maps of the Capel sites are focused on the proposed boundaries and do not reflect the situation that exists on the ground, disguising the merger the developments will cause, and the extent of green belt loss. To the west, FOG will be separated from the new town at Tudeley by a single field south of the B2170, which is bordered to by Church Lane and Hadlow Estate building works at Tatlingbury Farm; a further site for a small development also has planning permission in the eastern side of the field at Sychem Place. There are two smaller fields separating Capel Primary School from the village, bordered by the B2170 and railway. To the east, buildings which constitute the village adjoin the A228, which will be the only barrier between FOG and the expanded Paddock Wood; the situation is similar with Whetsted. The stand-off between FOG and the strategic sites is minimal and I believe the Local Plan mapping camouflages the true extent of the merger across Capel. A visual visit will confirm the reality, but I have attached a map which I believe shows a truer picture of the merger effect.

Alternative Sites

The failure to be objective is amply demonstrated by TWBC's lack of pro-active research in undesignated areas and failure to properly consider alternative sites:

- . A decommissioned prison (Blantyre House) in the undesignated areas was rejected as too small and, as a late submission, was not be properly appraised. However, minimal research shows land around the prison is also owned by HMG, with a capacity of 2,500+ dwellings and the advantage of being close to a railway station, unlike the site at Tudeley.

- Two further sites might have combined with this land (SHELAA 9 & 325), and brought the potential for housing to 3,800 dwellings. However, both sites were rejected as ‘...remote from the settlement centre...’, which might equally be applied to Tudeley. Incredibly, Site325 was also rejected as ‘...a strategic site of a scale harmful to the AONB landscape.’ However, the AONB lies at a distance of 1.15miles to S325, whilst Tudeley lies directly alongside the AONB and the impact on its setting and the historic landscape is inescapable.
- An alternative site to Tudeley was supported by Save Capel at Castle Hill, which remains within Capel’s Green Belt, but also in the AONB. It was rejected primarily for that reason, despite being adjacent to a significant commercial development which was backed by the same planning officers, which is also in the AONB.
- The Castle Hill site was also rejected as a gas pipeline ran underneath it. However, a mains gas pipe also runs under the original school site put forward by the Tudeley developers, and was deemed acceptable by TWBC’s planners despite that knowledge.
- During a meeting between the Council and the Castle Hill developers on 08/01/2021, the Head of Planning asked why the submission was being put forward so late and suggested it be brought forward at a later date; the inference being it would be acceptable, or properly considered, at that time – AONB notwithstanding. It therefore seems designation can be used to reject proposals, however sustainable, if they are inconvenient to the aim of building on land at Tudeley.
- On 11/01/2021 at the Cabinet Advisory Board, the Head of Planning intimated that Natural England would not allow development at Castle Hill as it was within the AONB, yet Natural England objected to the adjacent commercial development, also within the AONB, and which subsequently received Council approval. It seems barriers can be overcome where necessary, but firmed up to support rejection of alternative proposals that threaten the desired outcome.
- The Procedure Guide for Local Plan Examinations (Local Plans: the examination process - GOV.UK (www.gov.uk)) states in 1.11: *‘Plans which allocate sites for development will need to be supported by evidence demonstrating that the LPA has followed a logical and consistent method to identify and select the allocated sites, and to reject alternatives.’* I would suggest that the evidence shows that the Local Plan is riddled with illogical and inconsistent methodology designed to justify the strategic sites in Capel, however unsustainable they may be, and is therefore unsound.

Duty to Co-operate & Misinformation

Misleading and inaccurate statements have been a feature of the Council’s dealings with the community in Capel, including claims of long-standing cooperation with neighbouring boroughs:

- In claiming that TWBC have complied with the **Duty to Cooperate**, at the Planning Advisory meeting on 05/08/2019, Head of Planning told Councillors that officers had consulted with other boroughs throughout. However, on 24/07/2019, 12 days before the meeting and 3 months after the Tudeley proposals became public, Tonbridge & Malling Borough Council’s Planning Officer advised; *“On TWBC – we have had Duty to Cooperate meetings with colleagues there, but these were before they proposed the sites in their reg 18 plan – the principle of new settlements was mentioned but there were no sites identified at that time.”* The suggestion that neighbouring boroughs were aware of the proposals for Tudeley ‘throughout’ was misleading, if not disingenuous.
- At an initial meeting with the community the Head of Planning Services indicated that the ease of dealing with a single landowner was a primary factor in the Council’s decision to settle on the site at Tudeley. This was subsequently denied, but I understand exactly the same condition was attached to the Castle Hill proposals. This has irked residents who feel that officers are paid to take the right decisions, not the easy ones.
- At a TWBC Planning Advisory meeting on 05/08/2019, the Environment Officer claimed agricultural land in Tudeley and East Capel was ‘poor quality’. However, TWBC’s own assessment in a Development Constraints Study, shows the land as Grades 2 and 3; defined by Natural England as ‘Very Good’ and ‘Good to Moderate’. Grade 4 is ‘poor’ and none exists in the sites.
- Nonetheless, in an email of 15/10/2019, Head of Planning insisted again that land quality was ‘poor’, a misrepresentation potentially explained in the same response: *‘Particular attention will be given to: i) The grade of agricultural land and agricultural activities to minimise the effects on the rural economy and agricultural functionality...’* If the land is ‘poor’ the loss would have little

negative agricultural impact; loss of productive land is hard to justify – and remains so (Policy EN20).

Disclosure and omission

Many important aspects of the strategic sites in the PSLP are either based on assumption or left to the planning application stage when they will not be subject to independent scrutiny. The importance of these omissions gives cause for concern that assessments and process are being selected to avoid negative outcomes for the chosen sites:

- . The claim there will be ‘...an opportunity for betterment to the flooding and drainage issues which are present for residents of parts of Paddock Wood, and ecological and landscape enhancements as part of the exceptional circumstances case for the release of this Green Belt land...’ (PSLP 5.183) suggests such enhancements are not decided, in which case the exceptional circumstances the Inspector needs to consider are yet to be described.
- . TWBC commissioned David Lock Associates (DLA) to assess deliverability of the East Capel and PW proposals, but the work appears unfinished as ‘...further detail on phasing and mix of dwellings is required...’. Nonetheless, TWBC concluded that ‘...viability of the growth here is justified.’ (PSLP 5.177) Without such important work, viability seems a leap of faith.
- . No Cumulative Impact Assessment on the effects of the developments across Capel, including the KCC gravel extraction, has been done and there is no indication one will be commissioned. This is a key consideration given the clear impact that the combined works will have on biodiversity in the parish, and which is likely to show that biodiversity will be squeezed. It is perhaps not surprising therefore that such an assessment has not been readied for the Regulation 19 inspection.
- . No Environmental Impact Assessment has been completed for either strategic site, despite their key importance to the Local Plan. TWBC advise these will be left to planning application stage – so avoiding the results forming part of the independent examination. Moreover, a strategic EIA for both developments upon the parish would ensure a rounded consideration of facts, but this does not appear to be something TWBC wish to pursue.
- . Although it is clear that no railway station can be delivered at Tudeley, despite the Hadlow Estate’s wishful thinking, TWBC have decided to mention the masterplan’s provision for one, despite claiming it was not part of their consideration (PSLP 5.218). It is also far from certain that any improvements can be made to cross the railway, and no evidence is supplied. The lack of a railway station is highly damaging to the sustainability of the Tudeley site, so this mention appears to be an attempt to gloss over the effective division of the Tudeley settlement into two halves.
- . TWBC state the Tudeley ‘...development will be delivered through the production of a Framework Masterplan Supplementary Planning Document (SPD) to guide development in respect of the garden settlement principles and creation of a new community at Tudeley Village.’ (SS3 P162). This has not been done or started and begs the question, why not?
- . The so-called Five Oak Green by-pass that will connect the new town at Tudeley to a (currently unfunded?) Colt’s Hill by-pass for the A228, appears to be another incomplete proposal with the plan omitting trees, unlike the other Colts Hill plans in Other Reports Template (tunbridgewells.gov.uk). Moreover, whilst the Head of Planning stated at an early stage that an attraction of Tudeley was the ease of dealing with a single landowner – a condition I understand was repeated to the developer at Castle Hill. However, that criterion fails as the proposed route passes through land belonging to at least three different owners, two of which have expressed their opposition to the proposal. One objects as his land produces food through cattle and his livelihood would be lost, the other objects through historic ownership, whilst the third involves the significant heritage loss of the last working hop garden in Capel.
- . It would appear to make more sense to route the Five Oak Green by-pass north of the village from the new town at Tudeley to the A228. This would pass through land belonging to the same landowner and service the proposed gravel extractions. Instead, there will need to be two roads, north and south, which would incur additional and unnecessary loss of green belt. The reasoning is not clear, but could be because the southern route would cosmetically plan for traffic towards Tunbridge Wells, when the reality is most would head to Tonbridge or Paddock Wood. (This might also explain the curious proposal to seal off of the road into Paddock Wood from the Hop Farm roundabout). It might also help reduce costs to the developer, as the proposals look increasingly unviable financially if the northern part of the Tudeley site is ever to see construction.

- The plan for the Five Oak Green by-pass may also be deliberate opaque so as to avoid examination at Regulation 19; as the Council wrote to one of the landowners: *'... if the plan is found sound by an Inspector... it is unlikely a planning application for the Five Oak Green bypass will be submitted until after this time.'* I would question the legitimacy of leaving so much that is fundamental to the Local Plan to a later date, rather than producing hard evidence for scrutiny.
- The most important omission is the failure to include the Hadlow Estate (HE) Masterplan and Delivery Strategy in the TWBC bundle for the Regulation 19 inspection. TWBC say it is guided by the HE masterplan, and is fulsome in its praise (Strategic Sites Topic Paper - section 5), but then uses the excuse that it was not included as it was not commissioned by the Council. Given the vital importance the HE documentation has for the very foundation of the Local Plan (5.28 *'The advice and work undertaken by The Hadlow Estate has informed the approach to the policy within the Local Plan.'*), to omit it, or even annotate relevant sections from the overall package, deprives the Inspector from making their own judgment. **This is a significant failure in the disclosure of vital evidence.**
- Furthermore, in a response to a query on this matter, the Strategic Sites & Delivery Team Leader wrote *'...given the document is on the Hadlow Estate's website, in the public domain, it was not considered necessary to include it on the TWBC website at this time.'* This reasoning suggests the documentation not only could have been included but may be later, presumably at a time more convenient to the Council's aims. Like other documents that might reflect negatively on the proposals, the presumption is this will be at the planning application stage when the Council can perform its own scrutiny of the documentation, with predictable results. **This is a further example of what appears to be a manipulation of process to ensure an outcome.**

Public Opinion

Whilst TWBC talk about public engagement in the Local Plan process, it has been almost entirely negative and routinely ignored:

- In TWBC's 2017 Issues and Options document the public voted overwhelmingly to support an A21 'growth corridor' to meet housing need. This was subsequently put aside in favour of Tudeley and East Capel.
- In autumn 2019 at Regulation 18, in an 'unprecedented' wave of negative engagement, 95% of 1,000 responses objected to the strategic sites at Tudeley and East Capel. The response was ignored and, instead, Capel was handed a further 700 dwellings - in what looks suspiciously like punishment.
- In August 2020, Capel Parish Council organised a questionnaire on the future of the Parish as a pre-cursor to work formulating a Neighbourhood Plan. Again, in an open question, 95% of respondents voiced their disapproval of the Council's proposals for Capel in the Local Plan.
- In December 2020, Save Capel members voted by 95% to support an option at Castle Hill as an alternative to Tudeley, which would match the A21 'growth corridor', alongside the Kingstanding commercial area. This has also been rejected without full consideration.
- In May 2021 a candidate for the role of Capel Borough Councillor, who stood on a ticket to rework the Local Plan, swept aside the incumbent Councillor with a vote of 75% of an increased turnout.
- The Council have attempted to counter the arguments of the community through misinformation or obfuscation, rather than answering honestly or accommodating public sentiment. For example, the evening before the Full Cabinet met on 03/02/2021 to decide the fate of the Local Plan, the Head of Planning Services lobbied all councillors with a document negating many of the arguments the community had made, irrespective of merit or fact. Documents were only made available to Councillors a few hours before the meeting, which was insufficient time to make informed decisions, and many Councillors voted on what they were being told, rather than making decisions based on their own judgement.
- The Council's disdain of public opinion was summed up by the Head of Planning Services at a Cabinet Meeting on 21/01/2021; when asked to comment on the weight of resistance to the Capel proposals stated that *"It's not a numbers game,"* adding that just because lots of people do not want something does not mean it will be stopped. In essence, the community's voice is irrelevant where it does conform to Council plans. Consultation is therefore a meaningless tick-box exercise for TW Planning Services within the Local Plan process.
- This disregard continues. After the election in May 2021 of a Borough Councillor in Capel, who stood on a ticket supporting the community's views on the Local Plan, a Council spokesperson

commented; *"The responses to the consultation came in the most part from residents of areas where development is proposed."* It begs the question why the Council bothered with a consultation if the community most affected can be dismissed so readily?

Community

Capel is a rural ward and the local community of around 2000 souls is close-knit and, to coin a phrase used by the Borough Council, 'we love where we live.' To see our countryside and community destroyed is heart-breaking, especially when we can see that the proposals are unsustainable and unsound, and quite viable alternatives are overlooked or not properly considered:

- Capel currently consists of around 940 homes. The addition of over 4800 homes, will swamp the small but strong rural community that exists. It is very clear that the community, and those in neighbouring boroughs to be adversely affected by the proposals, are strongly against the Tunbridge Wells Local Plan as it currently stands. There is an acceptance that some level of housing is needed, but the lop-sided nature of the proposals – Capel has just 2% of the Borough's population but will bear 45% of its housing need - is far more than required in the area and Planning Services conceded many new residents will come from London and even further afield (new property in Paddock Wood is being advertised in China).
- The community's health and well-being will be sacrificed, and the ongoing proposals are already taking their toll, as decades of construction will blight the lives of those who live here. Air, noise and other forms of pollution are inevitable, and will have an adverse effect on people's health and mental well-being. The environmental damage will be huge, our ancient and precious landscape scarred forever, irreplaceable habitat lost and, ultimately, the community drowned in a tsunami of new residents.
- The detrimental effect on the community of over 15 years of construction across the area has not been addressed; perhaps because it cannot be if the strategic sites are to be developed. Residents are already complaining about dust and noise from the ongoing developments at Paddock Wood, which can only get worse. Countryside and open spaces are recognised to improve well-being, but these developments not only remove those wider green and open spaces, but air quality will suffer, noise levels will be incessant and Capel's dark skies will be lost.
- Tunbridge Wells has a policy to reduce air pollution (EN21), but the proposed developments pose a significant threat to the environment, including an increase pollution at a time of climate change. The Council are also has declared a climate emergency, but the developments can only aggravate the problem.
- TWBC aims to be carbon neutral by 2030; 6 years before the end of the Tudeley construction period. The loss of 600 acres of fields and hedgerows to large-scale development can only work against this aim, notwithstanding the Local Plan's strategic objective 10, which I note has been watered down from an earlier iteration of the Local Plan from *'to tackle climate change...'* to *'...support the goal to make the borough carbon neutral by 2030...'* The objective continues with the promise to *'.... minimise the impact of climate change on communities, the economy, and the environment...'* This is a fanciful statement when such large-scale construction will destroy carbon absorbing countryside, encourage greater use of cars, erase wildlife habitat and decimate the local community.
- The rejected alternative site to Tudeley at Castle Hill would not have so dramatic effect, being a sparsely populated area, and more sustainable being alongside a major transport artery, close to the town of Tunbridge Wells and the new employment opportunities at the Kingstanding commercial site. Moreover, combined with a focus on urban regeneration and not loss of greenfield and agricultural land, the environmental and human costs would be limited. Unfortunately, the opportunity to forge a local plan for the future that can be supported and welcomed by the public has been rejected by the Council in a preference for environmentally destructive and harmful, and deeply unpopular, proposals.
- The local population has fiercely raised its objections on several occasions but is routinely dismissed by the Council, which has also ignored the objections raised by the neighbouring authorities in Tonbridge and Malling, and Yalding in Maidstone Borough, which fear increased traffic congestion, pollution and flooding, and associated infrastructure and mitigation costs,

- caused by the developments. This deaf ear to public opinion cannot be considered as participation by the community as envisaged in the planning process, and renders the Local Plan unsound.
- Ultimately, TWBC's planning strategy appears to be centred on finding ways to justify the unjustifiable, with inconvenient truths placed aside to avoid examination at the Regulation 19. Rather than a positive and objective exercise on the merits of the Capel proposals, the Local Plan is a negative and subjective exercise to justify a pre-conceived conclusion. The Local Plan is peppered with inconsistency and a lack of disclosure or delay in important work, and is therefore unsound.
- The inevitable question is why a Local Planning Authority would resort to manipulation, misinformation, delay and bias if their Local Plan is 'sound'? That in itself must sow doubt on the Local Plan's soundness, and I therefore ask the Regulation 19 inspection not only looks at what is being put forward, but also what is missing.

Biodiversity

NPPF para 177 states: *The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.* However:

- There has been no **Cumulative Impact Assessment** of the effect of development across Capel, compounded by KCC gravel excavations between the two sites, and the extensive road infrastructure required to service both developments and gravel extraction. The combination of these proposed works will transform Capel from a rural ward to an urban sprawl from Tonbridge to Paddock Wood, and from the Medway to the AONB. The cumulative impact on wildlife (as well as food production, landscape, heritage assets, the local community and flooding), is likely to be far greater than each aspect of TWBC's and KCC's plans taken in isolation, yet the isolationist approach is what the authorities and developers insist on taking. It is vital a Cumulative Impact Assessment is made; however inconvenient the findings may be to the strategy of placing the majority of development in Capel and Paddock Wood.
- In a report submitted to the TW Planning & Transportation Cabinet Advisory Board on 19/08/2019, the Landscape and Biodiversity Officer suggested better woodland management might mitigate the loss of habitat and achieve 'net biodiversity gain', but the land being lost in Capel (which forms the vast bulk of the borough's development plans) is primarily fields and orchards, and woodland management would achieve very little against the inevitable biodiversity loss. When this was pointed out the officer replied that they 'may target enhancing some farmland areas, perhaps field headlands...', whilst adding that biodiversity had declined through modern farming methods, evidently forgetting the hugely damaging effect of habitat loss through large scale developments.
- Despite 2 years in which to do so, the Local Plan does not take biodiversity mitigation much further and wildlife dependent upon those fields and orchards face widespread loss of habitat, adding to the worrying decline in their numbers. The proposals for biodiversity gain remain vague, inadequate and destructive. The Local Plan is therefore unsound.

Question 6

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Properly consider alternative sites, such as Castle Hill, which is far more sustainable than the site at Tudeley.
2. Take proper account of public consultation and opinion.
3. Use objective and pro-active research to reach the right conclusions.
4. Apply the proper intentions of the NPPF and national policy; protecting designated areas and focusing on brownfield and undesigated areas first.
5. Create a Local Plan for the future which is based on urban regeneration rather than destruction of the countryside, by taking properly into account the societal changes inevitable in a post-covid world; make use of empty shops and offices as dwellings to regenerate TW's towns by increasing footfall to generate business for independent retailers.
6. Focus on protecting the environment and assiting climate change, rather than targeting the erasure of countryside and communities; protect the health and well-being of residents rather than adding pollution and disruption, and take account of the threats (such as increased pollution, traffic congestion, infrastructure costs and flood threat) the strategic sites pose to residents and neighbours.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been involved in the Save Capel campaign since May 2019 and can produce evidence to support what I am saying at a hearing, if required.

If you would like to attach a file in support of your comments, please upload it here. [Development Map of Capel.docx](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sarah Marchant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Sarah Marchant [REDACTED]
Comment ID	PSLP_972
Response Date	02/06/21 16:24
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Sarah Marchant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Five Oak Green my entire life, that is 39 years. The surrounding countryside has meant not just a space for safe recreation, exploration and relaxation, but a working environment too. My work as a stock photographer has led to me photographing everything from the macro of rolling landscapes and agricultural land to the micro details of the diverse flora and fauna in this area.

I wish to make it clear that this is not a simple case of "NIMBYism", as I'm sure cynics could regard my objections – and indeed those of the hundreds of people in the area who have been attending the Save Capel meetings and displaying posters, car stickers and banners in support of the campaign.

I understand the need for new development, but it should be done in a sustainable, sensitive way. This sudden, crass onslaught of development over Green Belt land is neither of those things. What happened to Green Belt land acting as protection between developments, to keep corridors of nature, "lungs" for the land? In the time of COVID-19, the ability to get out into the countryside for a break, to meet up with a friend as the restrictions begin to ease, and to get exercise has been an enormous boost to people's mental and physical health. Where would this solace be found if the natural world continues to be gobbled up by development? The proposed development in Tudeley and East Capel will merge Tudeley, Five Oak Green and Paddock Wood into one enormous settlement, changing the landscape forever. There could surely be more use of brown field sites, as well as proposals for pockets of development, rather than one whole new town, slap bang in the middle of Green Belt land and on the outskirts of the AONB.

There doesn't seem to have been much basic thought given beyond the convenience of one landowner offering a huge swathe of their land. One example of a basic flaw in the plan would be surrounding All Saints' Church and its world-famous Chagall stained glass windows with a modern residential development. Currently the church sits next to a few cottages, barn conversions and an oast house conversion. A beautiful snapshot of the Garden of England. Beyond the church lies a public footpath, rolling farm fields, trees, hedgerows and a view all the way to Hadlow Tower (which can also be seen from the road). The church and its windows draw visitors from across the globe and has been a compulsory stopping point when taking friends from overseas on a tour of my home area. Preservation of this piece of history should include preservation of its environment too.

There's a proposal for roads and a bike path across the landscape. This isn't the flat landscape of Norfolk, so if you want a usable bike path that's not too vertiginous, you're not going to be using the land sensitively. The only way to make a bike path accessible is to carve it into terrain to even out its gradient, thus destroying the medieval landscape.

Quite aside from the disruption caused in the construction phase, there will be a significant increase in traffic in to Tonbridge from the B2017 as these thousands of houses become inhabited – the new residents bringing with them their cars and need to commute, exacerbating the extreme traffic congestion that exists on this road every morning. There are already unacceptable levels of traffic between 7.45am to 9am on Woodgate Way, Vale Road and Pembury Road, while in Five Oak Green, the B2017 becomes

jam-packed when the primary school's day begins and ends, with parents parking their cars along the road and up Church Lane. It makes an absolute mockery of the proposal to add a new 6 form entry senior school (and all the traffic that would go with it) next door to the primary school.

Network Rail has confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period. People living in Tudeley would therefore use Tonbridge Station for commuting and Tonbridge town services that will require more parking. The increase in traffic will be more than Tonbridge can cope with. Its roads are already full at peak times and can't be made wider in most places. The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult than it presently is.

Most people living in the proposed new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. It's hard to imagine a great increase in bus use, when current settlements are only served by hourly buses. The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. It is not surprising that Tonbridge & Malling council has serious concerns about the proposals in the Local Plan.

The cost to Tonbridge-based businesses due to traffic issues may drive businesses from the area. There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is so much closer.

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change on the area and its residents. Flood mitigation measures may help, but I believe that flood risks will increase. It is generally understood that covering open land with houses and roads increases the risk of flooding and decreases opportunities for draining and evaporation. Five Oak Green already has its own flooding concerns – check the height of the doorsteps in Ellis Close if you'd like a visual reminder of this – and decreasing opportunities for drainage in the surrounding landscape is a thoughtless idea. The Medway will flood more often and cause increased flood risk not just in my village, but in Tudeley, Golden Green, East Peckham, Tonbridge and Yalding.

In currently relatively sparsely-populated land, where clusters of houses line the roads, light and sound pollution is low. Throw in a couple of thousand residences (along with possible compulsory purchase orders for existing residents in long-established residences) and a secondary school and there will be a huge increase in air, light and noise pollution that will not just affect the tranquillity of Capel, but also spread across the boundary in to Tonbridge & Malling and create a visual scar across the landscape. The recent reports of tremendous light and noise pollution from the lorry park at Ashford show just what an effect this can have on residents and on the night sky. Once again, the protection and breathing space for man and beast offered by the Green Belt is kicked to the side with apparently no thought. Placing such a heavy burden of development in just one rural area must be reconsidered.

The parish currently has 950 houses and so the sheer number of new houses being placed together is difficult to comprehend. The idea that all this land is being offered by one landowner – who stunningly, then talks about managing the development of the land too if the Local Plan goes ahead in its current form – rings alarm bells. Where is the opportunity for other landowners to offer areas of land for development? The perceived ease of dealing with one landowner and one great block of land should not outweigh the value of reducing the density of the development across the borough and of allowing other landowners the benefit of a slice of the business.

The housing need calculated by the government can be reduced where it would require development of Green Belt land, unless “exceptional circumstances” exist. With brownfield sites available locally and the strong local objection to such a massive development, I would like to see TWBC use this argument of being unable to build on Green Belt land to remove the garden settlement at Tudeley from the Local Plan. TWBC should be looking to protect what is within its borough, not sacrificing a chunk of it.

While there is a mention of affordable housing and social housing in the Local Plan leaflet, there is no suggestion of the proportion of houses built to answer such need. All too often new development is undertaken to reap the highest profits and not with any regard as to whom it could benefit – see the two large new build houses in the middle of Five Oak Green, which stood empty for more than 12 months.

It is incomprehensible why TWBC is placing such a huge new development in one parish, rather than working with multiple landowners to provide sensitive areas of development to extend existing settlements in a sustainable manner, and using existing brownfield sites, in order to spread the impact of development across the borough. There is no sense of proportion in the Local Plan as it stands.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Susan Marchant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Susan Marchant [REDACTED]
Comment ID	PSLP_340
Response Date	24/05/21 15:49
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.6
Question 1	
Respondent's Name and/or Organisation	Susan Marchant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Five Oak Green for 43 years and apart from an apparently uncontrollable increase in lorry traffic, I have seen the development of the village progress in a sustainable way. Additional housing has grown up of course, but has not made an adverse impact on the community and in many cases has replaced or extended old dwellings or been built on rundown areas. However I strongly object to the plan now before you in all aspects.

TWBC's Draft Local Plan was a disaster for Capel parish and vigorously opposed. However the council chose to take no account of the strength of objections, or to consider alternatives and proceeded to take the plan forward to Regulation 19. The local elections in May confirmed the depth of feeling in Capel ward when the Liberal Democrat candidate, who has worked tirelessly against the proposals since they first became public, was returned with a 75% share of the vote. The incumbent who was perceived to be very lukewarm in looking after the local interests, only managed 20%.

The proposal to build on this beautiful Green Belt valley, rich in woodland, hedgerows, meadows and farmland, adjacent to an AONB, flies in the face of all that we are being urged to value as a place to help reduce the impact of climate change and promote the mental and physical health of the population. There is no need for this area to be built on, it should remain rural and the agricultural land is now more important than ever. TWBC should be protecting this heritage for the future: instead they have chosen the lazy option of dealing with one landowner and dismissing other viable areas for development. The mission statement of the estate of said landowner makes interesting reading.

"An ongoing commitment to wildlife conservation, stewardship and ecological enhancement sits at the heart of our vision for the long term management of the Estate. This commitment includes a wide variety of landscapes and habitats, from Medway valley meadows and fields, interspersed with woodland and streams to higher forested ridges. We are proud of the Estate's diversity and the many species of birds, mammals, reptiles, insects and plants that live here." (hadlow.com)

Fine words indeed, which make putting this land forward for development on this scale even more hypocritical and objectionable.

Green Belt land is designated to prevent building sprawl and provide breathing space between urban areas. If the plans for Capel parish go ahead, TWBC will needlessly destroy acres of beautiful countryside and achieve the coalescence of Tonbridge and Paddock Wood. An ugly urban sprawl, with years of chaos and disruption for local people and businesses while this is put into effect. This will have a hugely detrimental impact on the area in terms of permanent loss of agricultural wildlife habitat, damage to biodiversity, air quality, light pollution and massive increase in carbon footprint. The fact that the area is already a flood plain only seems to elicit a shrug of the shoulders and no viable measures to deal with it. There is potential for serious flooding in the parish and in the surrounding areas of Tonbridge, Yalding, Golden Green and East Peckham. The impact of climate change must be given serious consideration.

The idea that a small rural parish on the edge of the borough, 2% of the borough's population, should be forced to absorb 51% of the perceived housing requirement is illogical, unbalanced and unsustainable. The question remains as to how this need was calculated; current figures are lower than those used by the council. Who are these houses for exactly? The priority should be to meet local needs at prices local people of all age groups, at whatever stages of their lives, should be able to afford. Too many developments emphasise the 4/5 bedroom executive type dwellings, forgetting those who might need a small flat, a 2 bedroom house, someone with a disability who might like some independence. There is no evidence of a likely positive outcome or clear goals for the benefit of the people of the borough and least of all for the residents of Capel parish.

The implication is that these houses will be for people who work outside the area and who will be commuting. The recent pandemic has shown that working from home is not an impossibility, but the added burden of another 13,000 people using the local infrastructure will impinge particularly on Tonbridge, as the nearest local town, not Tunbridge Wells. Tonbridge already struggles with commuter chaos, crowded trains, parking problems and there will be added pressure on health services, schools and local amenities. In the meantime TWBC will collect the Council Tax.

Due consideration has not been given to the possibility of using other available sites. Brownfield sites, council owned buildings no longer used for the original purpose and a site at Castle Hill, close to the A21 could supply the housing required. The council seems fixated on destroying Capel parish. The council leader has already told Save Capel "You will never win". It begins to feel personal and vindictive in the extreme and I hope the inspector will be able to clearly see that this plan is unsustainable and the proposals for this site should be dismissed. Tudeley garden village should never have reached this stage.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jack Marr ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Jack Marr ([REDACTED])
Comment ID	PSLP_1311
Response Date	04/06/21 15:08
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jack Marr
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
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Question 5

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I live nearby and have lived in the area on and off for forty years, as my family have for several generations.

We are already experiencing many issues in the area relating to overloaded infrastructure including GP surgeries and excessive traffic, and the proposed site has had repeated problems with flooding. Possible brownfield sites have not been adequately explored and alternatives have been de prioritised.

TWBC are proposing putting 50% of their housing in this area alone, with massive impacts on the local environment, particular through pollution from car use - this is an appallingly unsustainable proposal. This rural green belt parish will be completely destroyed by a 500%+ increase in population. This is entirely against Green Belt principles. 51% of local housing need is being forced on 2% of the TMBC population, a vastly disproportionate burden.

The community engagement has been utterly lacking. Despite over a thousand complaints about the Plan's impact, TMBC has completely ignored local residents and indeed added more housing to the plan. The plans were overwhelmingly rejected in consultation yet the initial 440 houses were increased to 2800 in the space of a few weeks. 97% of comments on the plan had been negative yet no steps have been taken to mitigate concerns - rather vastly more houses have been added, showing contempt for local residents.

It is situated in a high risk flood area where we already experience flooding in bad weather.

Hundreds of acres of productive agricultural land - increasingly needed - will be destroyed by the development.

While the plan is the responsibility of TWBC - who will receive the benefit of council tax - the largest impact will be on Tonbridge and Malling, who will face a vast increase in traffic, pollution, noise, environmental degradation, increased strain on already stretched medical and educational facilities and more. This is a very unreasonable move on the part of TWBC.

The purpose of the Green Belt is to prevent urban sprawl, but this project will effectively join Tonbridge and Paddock Wood. In 2016 the Inspector for the Site Allocation Local Plan stated that there was no need to allocate green belt land and did not recommend it. This plan is destructive of our collective heritage of England's rural spaces and ecosystems which especially in the South East are dwindling fast.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Lawrence Matthews [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Pembury [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lawrence Matthews [REDACTED]
Comment ID	PSLP_408
Response Date	24/05/21 08:42
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Letter
Version	0.5
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Lawrence Matthews
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Regulation 19 The Local Plan Re Policy STR/SS3 Proposal for a Tudeley Garden Village

I will send in the normal regulatory Form, but wished to express my views in letter form.

I have many concerns about the Local Plan, but my main objection is regarding the proposed Garden Village in Tudeley. STR/SS3.

I am a Resident in Pembury which borders the Capel area. We spent a year with my son in Golden Green, while our House was renovated. I have therefore become very familiar with the Capel using the route along the A228 to the B2017 from 5 Oak Green and Hartlake Road which crosses the Medway, which is set in this glorious Farmland.

TWBC did not address the many concerns the Community raised during the Regulation 18 consultation. 95% of the Response were against these proposals at that stage. TWBC representatives were dismissive of these objections at the meetings. Stephen Baughan the Building Inspector gave a reply at a meeting that "It was not a numbers game". Councillor McDermott told the Save Capel group that "They would never win". It is not surprising that the Conservative Council lost their Majority at the Local elections recently.

The wider concept of this Garden Village in 170 hectares of Agricultural and mixed Woodland is just wrong. The plan is to build 2,800 Homes initially on this Farmland, which had just been released from Green Belt status.

Before discussing the appropriate selection of this site, the principle that the Green Belt can be eroded like this has far reaching repercussions for the way all of our lives will be diminished if the green belt is taken and an ever-increasing Urban sprawl continues in the South East.

The specifics of why I feel that this is in the wrong locality are as follows.

INFRASTRUCTURE

There simply is not any. You have wide open Countryside at the moment.

TRANSPORT

All the roads from Five Oak Green to Tonbridge are totally congested every morning and evening. A major overhaul and a major expansion of the Road network would be needed, which I am sure that the good people of Tonbridge do not want. I also understand that BR will not entertain the idea of building a further Railway Station.

POLLUTION

Besides additional Road Traffic of all description with corresponding increases in air pollution and CO2 emissions. There will be increases in noise pollution, and not forgetting the light pollution which will transform the whole area.

WATER & SEWERAGE

Both are totally inadequate at present. A lot of investment would be needed to instal these services for a new population.

FLOOD RISK

The whole area is on, or close to Flood risk areas. Again the wrong development in the wrong area.

ENVIRONMENTAL CONCERNS

Should we not as Humans try to protect, restore, and expand our green and wild spaces, allowing nature to thrive, taking carbon from the air and boosting our health and wellbeing

This proposed new development would work against all of these principles. We have enough infrasture around the Towns of Tunbridge Wells and Tonbridge to gradually expand development , and leave this small remaining area of Green Belt for all to enjoy.

Please take some time to speak to the representatives of the save Capel campaign. They are not NIMBYS, but good people with the countryside a heart.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Roger Maxted [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Roger Maxted [REDACTED]
Comment ID	PSLP_970
Response Date	02/06/21 17:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Roger & Nicola Maxted
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 (for Tudeley Village)	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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My family & I moved to Golden Green in May 2003, we have worked locally and in the surrounding area so we appreciate how long it takes to travel any distance at rush hour, am, pm and at school finishing times due to traffic congestion. When we arrived in the village, our children were 2 and 4 years old. The school and nursery places were at a premium and we didn't get our first choice for primary school or nursery as they were full!. To our knowledge no further primary schools have been built within the area. When registering for a GP Surgery, again we had to register with a GP surgery further away than the nearest. The nearest surgery to us closed a few years ago.

The services in the areas have progressively deteriorated. Water supply quality and sewage blockages; 2 in our first 10 years, 4 this year alone due to new build infills on green belt land within the village. The electricity supply is also temperamental as well as broadband and phone line.

Due to regular flooding from both the River Bourne and River Medway, there is very limited access in and around the areas as roads are impassable and bus service are unable to run. We are one of the lucky ones that haven't flooded yet, it's just a matter of time and this new development will hasten this as more land is developed. The environment is being destroyed by deforestation and the ecological erosion of the natural resources can't continue. We feel that the garden of England is being destroyed by over-development.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Victoria Maxted [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Victoria Maxted [REDACTED]
Comment ID	PSLP_984
Response Date	02/06/21 18:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Respondent's Name and/or Organisation Victoria Elizabeth Maxted

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3 Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

My parents, brother and I moved to Golden Green in May 2003 when I was almost 4 years old. Golden Green is the only home I know. I have grown up here, went to Hadlow Primary School, Weald of Kent Grammar School and Bennett Memorial School; all in the local area. Over the years I have seen many properties be built on green belt land and not brown belt. Most recently, 4 houses in Golden Green built on METROPOLITAN GREEN BELT LAND. I remember saying as a 10 year old to my parents that I should save my pocket money to buy a piece of green belt and in 10 years time, I'd be able to build a house on it. My parents told me that green belt was for protecting the environment and that everyone should build on brown belt. 12 years later, houses are popping up all over green belt and every pub seems to be being turned into houses (see East Peckham and Hadlow). I should have saved my pocket money - the environment doesn't seem to matter to you.

You can see we are damaging our environment. Look at the flooding we have. As a village, when there is heavy rain, we are blocked in to the village through the River Bourne and River Medway. Even the buses can't enter the village.

Speaking of buses and traffic. The local traffic is appalling. Weald of Kent was our nearest school (3.1 miles according to the council). School finished at 3.35pm everyday. I would not get home until 5pm due to the 208 bus. At least once a week it also would not come. I did the journey just this week (half term holidays) from Weald to Home - 12 minutes. And yet 85 minutes plus at school time. Ridiculous.

I would also like to point out that school children walk around Tudeley. I did part of my Duke of Edinburgh on that stretch of road and it is deadly. I felt sorry for the people who had to get the bus to school using that road. If you build more houses, there will inevitably be more children (unless you're building 2500 retirement homes) and thus more traffic and more children needing to get an education. I cannot believe that you have actually thought this through.

I feel that the Garden of England is being turned into a building site. Everywhere we look, there are builders and scaffolding. The Garden of England is called The Garden of England because we're suppose to have greenery and beauty. I know Tunbridge Wells has lost its ROYAL but don't let Kent lose its GARDEN.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Build on Brown Belt - improves the environment by protecting the environment we are SUPPOSE to be protecting.

Council Tax to go to Tonbridge and Malling - Council tax is designed to improve infrastructure in the local area. By building on the edge of the borough, most new residents will be using Tonbridge and Malling facilities NOT TUNBRIDGE WELLS.

The road from Paddock Wood, Capel and Tudeley is already overcrowded with dangerous road conditions and traffic. Try putting money into the roads that YOU want to populate further. If you increase traffic on that road, you need to consider the bus stops, footpaths, cycle paths and the quality of the road. When the 205 stops on Tudeley Road (B2017) in the morning and evening, it stops traffic flowing. Adding more travellers will just add to this traffic jam.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Richard Mewett [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] East Peckham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Mewett [REDACTED]
Comment ID	PSLP_1704
Response Date	04/06/21 10:44
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Richard Mewett
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Objection to local plan STR/SS3

I object to the proposed plans for the following reasons.

Green belt. It's supposed to be protected. TWBC will be failing their duty to do that.

Flooding. The development can only cause increased flooding downhill and downstream in East Peckham and Yalding, areas that already suffer due to over development of green belt.

Much if the development will be in a flood plain.

The pressure on the hospital which is already busy with long waiting lists.

The burden on GP's that are already very difficult to see.

Increased traffic on unsuitable roads. Hartlake Rd cannot cope with such an increase and the proposal to close it will cause chaos for the villages on the TMBC end of it.

Light pollution affecting the night sky.

Massive carbon footprint and pollution.

The destruction of countryside, wildlife, their habitats, farmland, tradition, heritage and the rural way of life.

Disproportionate allocation of housing within the borough leading to the ruin of a peaceful community.

The contempt and disregard for residents within TMBC. If TEBC want a massive development they should accept it further into their borough and accept the negative effects rather than put that misery into TMBC residents.

The entire area has not the infrastructure to cope with the proposed development.

97% of respondents opposed the local plan yet TWBC have done nothing to address this, merely made revisions that worsens matters.

Planners and councillors failing in their duty to represent their parishioners and residents.

All told, an entirely ridiculous plan showing no concern for the public or the environment.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Supporting Information File Ref No: SI_109a-n

Comment

Agent	Mr Steve Brown [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woolf Bond Planning
Address	[REDACTED] [REDACTED] READING [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Millwood Designer Homes Ltd
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Millwood Designer Homes Ltd [REDACTED]
Comment ID	PSLP_1857
Response Date	03/06/21 14:53
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	App 01b P352 Rusthall - Access improvements.pdf App 01c Plan WBP1 - Land at Home Farm, Rusthall.pdf App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf WBP Reps for Millwood - Rusthall - 3 June 2021.pdf App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf App 01d Home Farm - Site Context Plan WBP2.pdf App 04 Sevenoaks DC v CLG [2020] EWHC 3054.pdf APP08T~1.PDF APP10E~1.PDF App 03 Sevenoaks Final Report Mar 2020.pdf APP09U~1.PDF APP01A~1.PDF APP02I~1.PDF

Data inputter to enter their initials here KJ

Question 1

Respondent's Name and/or Organisation Millwood Designer Homes Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: full representation attached has been separated into Policy STR1 (PSLP_1839, Policy STR9 (PSLP_1848), Policy PSTR/RU1 (PSLP_1856) and Policy STR/SS3 (PSLP_1857). See also appendices attached].

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our clients (Millwood Designer Homes Ltd) control the land at Home Farm, Lower Green Road, Rusthall (SHLAA Site Ref: 60). This site has been promoted through earlier stages in the Local Plan as an additional location for growth in the Borough, taking account its credentials as a sustainable location for growth adjoining the acknowledged suitability of Rusthall, as indicated in the Council's SHLAA. In contrast to other locations, the development of new homes at the site will ensure the embedment of behaviour associated with the sustainable living unlike other locations in the Borough, especially the new community proposed at Tudeley Village.

1.2 Further to our submissions on earlier stages in the preparation of the Local Plan, the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing." Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing infrastructure and services such as those available at Rusthall which include those relating to health, education, leisure, retail and employment. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.3 Have regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village with replacement with an allocation at Home Farm, Rusthall. For the reasons detailed in this submission, growth at Home Farm, Rusthall due to its relationship with existing development and facilities would result in achievement of sustainable development. Furthermore, the proximity of the Home Farm site to services and facilities that residents will need to undertake their daily life ensures that sustainable behaviours are embedded in residents from initial occupation of the homes.

1.4 This contrasts with that at Tudeley Village which due to the limitations of these in the local area will result in need for longer journeys to undertake daily lives, which are therefore likely to result in increased use of the car. Once this behaviour becomes the normal for residents in Tudeley, it will be harder to encourage them to switch to more sustainable alternatives once they become available.

1.5 The reports and documents submitted with this representation demonstrate the suitability of the approach advocated. As detailed in the representations, this land is not subject to constraints which would prevent its delivery for development at an early stage during the emerging plan period should this be confirmed through the examination of the Plan.

1.6 We also have several comments/representations on the policies within the Draft Submission Tunbridge Wells Borough Local Plan which should be addressed prior to its submission for examination by the Secretary of State.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1 Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of submissions on behalf of Millwood Designer Homes to the Council's Draft Local Plan Regulation 18 Consultation (November 2019) (Appendix 1)
- Copy of Inspector's assessment of the Tonbridge & Malling Local Plan (15th December 2020) (Appendix 2)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (Appendix 3)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (Appendix 4)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (Appendix 5)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (Appendix 6)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (Appendix 7)
- Tandridge LP Inspector's interim conclusions (11th December 2020) (Appendix 8)
- Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (Appendix 9)
- North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (Appendix 10)

2.2 Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy and extent of Built Developments

Objection

Policy STR8: Conserving and enhancing the natural, built, and historic environment

Objection

Policy STR9: Green Belt

Objection

Policy PSTR/RU1: The Strategy for Rusthall Parish and the omission of land at Home Farm, Lower Green Road (Site Ref: 60)

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Omission site – Land at Home Farm, Lower Green Road, Rusthall (SHLAA Ref 60) – failure to include as an allocation in policy PSTR/RU1

Objection

3. OVERARCHING POSITION

3.1 We have a strong belief in the principle of the plan-led system and in setting out our representations upon these policies, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2 We have considerable experience and expertise in dealing with and realising development schemes through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3 Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4 In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. This therefore indicates that the Plan must seek to deliver the minimum of 14,364 dwellings between 2020 and 2039 rather than 12,204 dwellings from 2020 to 2038 as currently envisaged.

3.5 To address this requirement for additional homes, we contend that land at Home Farm, Lower Green Road, Rusthall should be allocated for residential development (SHLAA ref 60). This site can accommodate 25 dwellings (including a policy-compliant level of affordable housing) and as indicated in these representations and the supporting documents would be a sustainable addition to the village.

3.6 The representations also highlight a failure of the plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of Home Farm, Rusthall can also supply homes to resolve this issue.

3.7 As detailed in the representations, the Home Farm site would be a logical addition to the existing development in Rusthall and should consequently be included in the defined extent of the village, alongside its removal from the Green Belt.

3.8 We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the authority.

3.9 We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1 Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3 In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4 Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5 The Local Plan should seek to meet the Council’s full housing need. However, we have concerns regarding the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the Borough’s development needs.

4.6 For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7 These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government’s planning advice and policy. They also advocated changes to the extent of the defined settlement area of Rusthall alongside consequential revisions to the Green Belt together with amendments to other policies of the plan.

4.8 These amendments would reflect our view of the clear sustainability advantages of growth at Rusthall in preference to unsustainable locations where development conflicts with the approach of the NPPF i.e. Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9 Furthermore, to address the additional identified housing need, we advocate that land at Home Farm, Lower Green Road, Rusthall (SHLAA Ref 60) should be included as an additional allocation within draft policy PSTR/RU1.

4.10 The remainder of this submission is focused on providing responses to the Council’s draft policies in the Local Plan.

8. POLICY STR/SS3: THE STRATEGY FOR TUDELEY VILLAGE

8.1. Through policy STR/SS3, the Council seeks to remove land from the Green Belt for the delivery of a new village at Tudeley.

8.2. For the reasons detailed below, we object to the proposal in that it entails the removal of very significant areas from the Green Belt for which there is no justification. This is both with respect of the scale of housing development envisaged as detailed in the representation to policy STR9. As we do not consider that very special circumstances have been demonstrated, this is a further indication that no revision to the Green Belt should occur at Tudeley as detailed in the representation to policy STR9.

8.3. As noted in the SA, to enable the delivery of Tudeley, significant infrastructure improvements will be required. This includes provision of new offsite roads (a new link road to the A228 and A228 improvements) to serve the site together with utility services, education, community, health and leisure facilities. For these factors, no indication has been provided in the current Draft infrastructure Delivery Plan of the costs or delivery mechanism of these investments. Without this information there is no certainty that the Plan can be delivered and consequently would be effective.

8.4. The Plans prepared by both Uttlesford Council (appendix 9) and the North Essex Authorities (appendix 10) failed with respect of some of the new settlements envisaged as the costs assumed were unrealistic and did not include sufficient contingency. The Tandridge Local Plan has significant

doubts with respect of the uncertainty of funding the major new road infrastructure associated with the South Godstone Garden Village, following a rejected HIF bid (appendix 8).

8.5. Although the Council has prepared information with respect of costs and delivery mechanisms for Tudeley, as indicates earlier in this submission the new settlement is not expected to contribute towards all the necessary infrastructure i.e. the Colts Hill off-line improvement (This is only included in the financial appraisals for development at Paddock Wood) which is required alongside the Five Oak Green bypass (which Tudeley is expected to contribute towards) (See the Viability assessment schedules in Appendix II of the Stage 2 Viability Appraisal). Furthermore, notwithstanding the financial viability assessments not including all infrastructure, development at Tudeley is not as viable as indicated under the same range of variables as other schemes. Tudeley is reliant on lower existing land values and higher property values to show it is viable. The limited evidence that development at Tudeley is viable is a further indication of the unsuitability of the current strategy.

8.6. Exceptional circumstances do not exist for the removal of Tudeley village. Whilst a matter of planning judgement, the Council cannot therefore make such a judgement as this would not be consistent with their statutory duty (section 39(2)) and the revised NPPF. The points raised above confirm that exceptional circumstances do not exist, are not soundly based and therefore do not support revisions to the Green Belt at Tudeley Village.

10. OVERALL CONCLUSIONS

10.1. The representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

10.2. As indicated in the representations, changes to policies of the Plan are advocated, including the borough's housing requirement in policy STR1.

10.3. To ensure adequate supply of housing arises, the land at Home Farm, Lower Green Road, Rusthall (Site Ref: 60) should be included as an allocation.

10.4. These matters can consequently be addressed through Main Modifications to the Plan allowing for a Sound Plan.

11. FINAL REMARKS

11.1. We trust the above comments are of assistance in preparing the necessary main modifications to provide for a sound Local Plan.

11.2. We welcome the opportunity to engage in constructive dialogue with the Council in relation to our observations, including the allocation of our client's site at Home Farm, Rusthall (Site Ref: 60).

11.3. Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Inspectorate for examination.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3

8.7. The Plan therefore as currently prepared is not sound with respect of:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and

b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

8.8. To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

1. That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e. the policies map to ensure that the Tudeley site is retained in the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To clarify any points the Inspector has with respect of the detailed representations submitted

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_116a-j

Comment

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Company / Organisation	Millwood Designer Homes Ltd
Address	Bordyke End 59 East Street Tonbridge TN9 1HA
Event Name	Pre-Submission Local Plan
Comment by	Millwood Designer Homes Ltd [REDACTED]
Comment ID	PSLP_1882
Response Date	03/06/21 16:15
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	App 01 Inspectors letter to Tonbridge and Malling 15.12.20.pdf WBP Reps for Millwood - Matfield - 3 June 2021.pdf App 09 Examiners Report on the Examination of NEA S1 10th Dec 2020.pdf App 05 St Albans v Hunston Properties 2013 EWCA Civ 1610.pdf App 07 Tandridge Inspector-Preliminary-Conclusions-Advice.pdf App 04 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf App 06 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf App 02 Sevenoaks Final Report Mar 2020.pdf App 03 Sevenoaks DC v CLG [2020] EWHC 3054.pdf App 08 Uttlesford Post stage 1 hearings letter to the Council 10.1.20 .pdf
Data inputter to enter their initials here	KJ
Question 1	

Respondent's Name and/or Organisation Millwood Designer Homes Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: full representation attached has been separated into Policy STR1 (PSLP_1876, Policy STR9 (PSLP_1879), Policy PSTR/BM1 (PSLP_1881) and Policy STR/SS3 (PSLP_1882). See also appendices attached].

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our clients (Millwood Designer Homes Ltd) have a controlling interest in land at Ashes Plantation, Maidstone Road, Matfield (Site Ref: 353).

1.2 The site was allocated in the Regulation 18 Draft Local Plan (Sept 2019) as a suitable and sustainable location to provide for 30-60 dwellings under Policy AL/BM3.

1.3 The council's decision to deallocate the site is not supported by the evidence base including this site assessment set out in the sustainability appraisal. Accordingly, the site should be reinstated as a housing allocation on similar terms to the wording set out in former Policy AL/BM3.

1.4 For the reasons set out below, we are of the view that the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing. Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing infrastructure and services such as those available at Matfield. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations, which approach would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.5 Having regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village and the allocation of deliverable sites in sustainable locations, including land controlled by our client at Ashes Plantation, Matfield. The site affords a logical opportunity in helping to meet identified housing needs and could provide for up to 60 dwellings, to include a policy-compliant level of affordable housing.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1 Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of Inspector's assessment of the Tonbridge & Malling Local Plan (15th December 2020) (appendix 1)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (appendix 2)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (appendix 3)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (appendix 4)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (appendix 5)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (appendix 6)
- Tandridge LP Inspector's interim conclusions (11th December 2020) (appendix 7)
- Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (appendix 8)
- North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (appendix 9)

2.2 Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy and extent of Built Development Limits

Objection

Policy STR9: Green Belt

Objection

Policy PSTR/BM1: The Strategy for Brenchley and Matfield Parish and the omission of land at Ashes Plantation as a housing allocation for up to 60 dwellings.

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Omission site – Land at Ashes Plantation, Maidstone Road, Matfield (SHLAA Ref: 353)

Objection

3. OVERARCHING POSITION

3.1 We have a strong belief in the principle of the plan-led system and in setting out our representations upon these polices, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2 We have considerable experience and expertise in dealing with and realising development schemes through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3 Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4 In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. This therefore indicates that the Plan must seek to deliver the minimum of 14,364 dwellings between 2020 and 2039 rather than 12,204 dwellings from 2020 to 2038 as currently envisaged.

3.5 To address this requirement for additional homes, we contend that land at Ashes Plantation, Maidstone Road, Matfield (SHELAA Ref: 353) should be allocated for housing development.

3.6 Our representations also highlight a failure of the Local Plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of Site Ref: 353 (Reg 18 Local Plan allocation Ref: AL/BM3), can also supply homes to resolve this issue.

3.7 As detailed in the representations, the site represents a logical addition to the existing development in Matfield and should be included in the defined extent of the village. This requires consequential amendments to the Limits to Build development for Matfield as defined on the Local Plan Proposals Map (Inset Map 21).

3.8 We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the Council.

3.9 We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1 Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3 In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4 Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5 The Local Plan should seek to meet the Council's full housing need. However, we have concerns regarding the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the Borough's development needs.

4.6 For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7 These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government's planning advice and policy. They also advocate changes to the extent of the defined settlement area of Matfield together with amendments to other policies of the plan.

4.8 These amendments would reflect the view taken by the Council in allocation the site at the Regulation 18 stage in preference to locations where development conflicts with the approach of the NPPF i.e. Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9 The remainder of this submission is focused on providing responses to the Council's draft policies in the Local Plan.

8. POLICY STR/SS3: THE STRATEGY FOR TUDELEY VILLAGE

8.1. Through policy STR/SS3, the Council seeks to remove land from the Green Belt for the delivery of a new village at Tudeley.

8.2. For the reasons detailed below, we object to the proposal in that it entails the removal of very significant areas from the Green Belt for which there is no justification. This is both with respect of the scale of housing development envisaged as detailed in the representation to policy STR9. As we do not consider that very special circumstances have been demonstrated, this is a further indication that no revision to the Green Belt should occur at Tudeley as detailed in the representation to policy STR9.

8.3. As noted in the SA, to enable the delivery of Tudeley, significant infrastructure improvements will be required. This includes provision of new offsite roads (a new link road to the A228 and A228 improvements) to serve the site together with utility services, education, community, health and leisure facilities. For these factors, no indication has been provided in the current Draft infrastructure Delivery Plan of the costs or delivery mechanism of these investments. Without this information there is no certainty that the Plan can be delivered and consequently would be effective.

8.4. The Plans prepared by both Uttlesford Council (appendix 8) and the North Essex Authorities (appendix 9) failed with respect of some of the new settlements envisaged as the costs assumed were unrealistic and did not include sufficient contingency.

8.5. The Tandridge Local Plan has significant doubts with respect of the uncertainty of funding the major new road infrastructure associated with the South Godstone Garden Village, following a rejected HIF bid (appendix 7).

8.6. Although the Council has prepared information with respect of costs and delivery mechanisms for Tudeley, as indicates earlier in this submission the new settlement is not expected to contribute towards all the necessary infrastructure i.e. the Colts Hill off-line improvement (This is only included in the financial appraisals for development at Paddock Wood) which is required alongside the Five Oak Green bypass (which Tudeley is expected to contribute towards) (See the Viability assessment schedules in Appendix II of the Stage 2 Viability Appraisal). Furthermore, and notwithstanding the financial viability assessments not including all infrastructure, development at Tudeley is not as viable as indicated under the same range of variables as other schemes. Tudeley is reliant on lower existing land values and higher property values to show it is viable. The limited evidence that development at Tudeley is viable is a further indication of the unsuitability of the current strategy.

8.7. Exceptional circumstances do not exist for the removal of Tudeley village. Whilst a matter of planning judgement, the Council cannot therefore make such a judgement as this would not be consistent with their statutory duty (section 39(2)) and the revised NPPF. The points raised above confirm that exceptional circumstances do not exist, are not soundly based and therefore do not support revisions to the Green Belt at Tudeley Village.

10. OVERALL CONCLUSIONS

10.1. Our representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

10.2. As indicated in the representations, changes to policies of the Plan are advocated, including the borough's housing requirement in policy STR1.

10.3. To ensure adequate supply of housing arises, the land at Ashes Plantation, Maidstone Road, Matfield should be included as a housing allocation for up to 60 dwellings.

10.4. These matters can be addressed through Main Modifications to the Plan allowing for a Sound Plan.

11. FINAL REMARKS

11.1. We trust the above comments are of assistance in preparing the necessary main modifications to provide for a sound Local Plan.

11.2. We welcome the opportunity to engage in constructive dialogue with the Council in relation to our observations, including the allocation of our client's site at Ashes Plantation, Matfield (Site Ref: 353).

11.3. Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Inspectorate for examination.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3

8.8. To address these matters of soundness, a range of amendments are proposed: a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and

b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

8.9. To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

1. That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e. the policies map to ensure that the Tudeley site is retained in the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To clarify any points the Inspector has with respect of the detailed representations submitted

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_119a-m

Comment

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Company / Organisation	Millwood Designer Homes Ltd
Address	Bordyke End 59 East Street Tonbridge TN9 1HA
Event Name	Pre-Submission Local Plan
Comment by	Millwood Designer Homes Ltd [REDACTED]
Comment ID	PSLP_1886
Response Date	03/06/21 14:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	App 09 Uttlesford Post stage 1 hearings letter to the Council 10.1.20 .pdf WBP Reps for Millwood - Hawkhurst - 3 June 2021.pdf App 06 St Albans v Hunston Properties 2013 EWCA Civ 1610.pdf App 04 Sevenoaks DC v CLG [2020] EWHC 3054.pdf App 01a Millwood TW Local Plan Reps - Hawkhurst - 14 Nov 2019.pdf App 08 Tandridge Inspector-Preliminary-Conclusions-Advice.pdf App 10 Examiners Report on the Examination of NEA S1 10th Dec 2020.pdf App 01b 5416-LLB-RP-L-0002-S4-P02 Landscape Statement.pdf App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf App 02 Inspectors letter to Tonbridge and Malling 15.12.20.pdf App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf App 03 Sevenoaks Final Report Mar 2020.pdf App 01c 5416-LLB-ZZ-XX-DR-L-0001-S4-P02 Landscape Principles.pdf

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Question 1

Respondent's Name and/or Organisation Millwood Designer Homes Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: full representation attached has been separated into Policy STR1 (PSLP_1883, Policy STR9 (PSLP_1884), Policy PSTR/HA1 (PSLP_1885) and Policy STR/SS3 (PSLP_1886). See also appendices attached].

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our clients (Millwood Designer Homes Ltd) control the land at Chittenden Fields, north of High Street (A268), Hawkhurst. This site has been promoted through earlier stages in the Local Plan as an additional location for growth in the Borough, taking account of its credentials as a sustainable location for growth adjoining the acknowledged suitability of Hawkhurst, as indicated in the Council's SHLAA. In contrast to other locations, the development of new homes at the site will ensure the embedment of behaviour associated with the sustainable living unlike other locations in the Borough, especially the new community proposed at Tudeley Village.

1.2 Further to our submissions on earlier stages in the preparation of the Local Plan, the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing." Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing infrastructure and services such as those available at Hawkhurst which include those relating to health, education, leisure, retail and employment and will support the continuation of them as advocated by paragraph 77 of the NPPF. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.3 Having regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village and the allocation of deliverable sites in sustainable locations, including land controlled by our client's at Chittenden Fields, Hawkhurst. The site affords a sustainable opportunity in helping to meet identified housing needs and could provide for circa 70 dwellings, in a landscape setting, within walking distance from local services and facilities.

1.4 For the reasons detailed in this submission, growth at Chittenden Fields, Hawkhurst due to its relationship with existing development and facilities would result in achievement of sustainable development. Furthermore, the proximity of the Chittenden Fields site to services and facilities that residents will need to undertake their daily life ensures that sustainable behaviours are embedded in residents from initial occupation of the homes. This therefore contrasts with that at Tudeley Village which due to the limitations of these in the local area will result in need for longer journeys to undertake daily lives, which are therefore likely to result in increased use of the car. Once this behaviour becomes the norm for residents in Tudeley, it will be harder to encourage them to switch to more sustainable alternatives once they become available.

1.5 The reports and documents submitted with this representation demonstrate the suitability of the approach advocated. As detailed in the representations, this land is not subject to constraints which would prevent its delivery for development at an early stage during the plan period should this be confirmed through the examination of the Plan.

1.6 We also have several comments/representations on the policies within the Draft Submission Tunbridge Wells Borough Local Plan which should be addressed prior to its submission for examination by the Secretary of State.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1 Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of submissions on behalf of Millwood Designer Homes to the Council's Draft Local Plan Regulation 18 Consultation (November 2019) (appendix 1)
- Copy of Inspector's assessment of the Tunbridge & Malling Local Plan (15th December 2020) (appendix 2)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (appendix 3)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (appendix 4)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (appendix 5)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (appendix 6)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (appendix 7)
- Tandridge LP Inspector's interim

conclusions (11th December 2020) (appendix 8)• Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (appendix 9)• North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (appendix 10)

2.2 Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy and extent of Built Development Limits

Objection

Policy STR9: Green Belt

Objection

Policy STR/HA1: The Strategy for Hawkhurst Parish and the omission of land at Chittenden Fields as a housing allocation for 70 dwellings.

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Omission site – Land at Chittenden Fields, north of High Street (A268), Hawkhurst (SHLAA ref 2) – failure to include as an allocation in policy STR/HA1

Objection

3. OVERARCHING POSITION

3.1 We have a strong belief in the principle of the plan-led system and in setting out our representations upon these policies, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2 We have considerable experience and expertise in dealing with and realising development schemes through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3 Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4 In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. This therefore indicates that the Plan must seek to deliver the minimum of 14,364 dwellings between 2020 and 2039 rather than 12,204 dwellings from 2020 to 2038 as currently envisaged.

3.5 To address this requirement for additional homes, we contend that land at Chittenden Fields, Hawkhurst should be allocated for residential development (SHLAA ref 2). This site can accommodate 70 dwellings and as indicated in these representations and the supporting documents would be a sustainable addition to the village.

3.6 The representations also highlight a failure of the Local Plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of Chittenden Fields, Hawkhurst, can also supply homes to resolve this issue.

3.7 As detailed in the representations, the Chittenden Fields site would be a logical addition to the existing development in Hawkhurst and should be included in the defined extent of the village. This requires consequential amendments to the Limits to Build development for Hawkhurst as defined on the Local Plan Proposals Map (Inset Map 15).

3.8 We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the Council.

3.9 We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1 Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3 In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4 Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5 The Local Plan should seek to meet the Council’s full housing need. However, we have concerns regarding the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the Borough’s development needs.

4.6 For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7 These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government’s planning advice and policy. They also advocate changes to the extent of the defined settlement area of Hawkhurst together with amendments to other policies of the plan.

4.8 These amendments would reflect our view of the clear sustainability advantages of growth at Hawkhurst (Consistent with paragraph 77 of NPPF) in preference to unsustainable locations where development conflicts with the approach of the NPPF i.e. Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9 Furthermore, to address the additional identified housing need, we advocate that land at Chittenden Fields, north of Highs Street, Hawkhurst (SHLAA ref 2) should be included as an additional allocation within draft policy PSTR/HA1.

4.10 The remainder of this submission is focused on providing responses to the Council’s draft policies in the Local Plan.

8. POLICY STR/SS3: THE STRATEGY FOR TUDELEY VILLAGE

8.1. Through policy STR/SS3, the Council seeks to remove land from the Green Belt for the delivery of a new village at Tudeley.

8.2. For the reasons detailed below, we object to the proposal in that it entails the removal of very significant areas from the Green Belt for which there is no justification. This is both with respect of the scale of housing development envisaged as detailed in the representation to policy STR9. As we do not consider that very special circumstances have been demonstrated, this is a further indication that no revision to the Green Belt should occur at Tudeley as detailed in the representation to policy STR9.

8.3. As noted in the SA, to enable the delivery of Tudeley, significant infrastructure improvements will be required. This includes provision of new offsite roads (a new link road to the A228 and A228 improvements) to serve the site together with utility services, education, community, health and leisure

facilities. For these factors, no indication has been provided in the current Draft infrastructure Delivery Plan of the costs or delivery mechanism of these investments. Without this information there is no certainty that the Plan can be delivered and consequently would be effective.

8.4. The Plans prepared by both Uttlesford Council (appendix 9) and the North Essex Authorities (appendix 10) failed with respect of some of the new settlements envisaged as the costs assumed were unrealistic and did not include sufficient contingency.

8.5. The Tandridge Local Plan has significant doubts with respect of the uncertainty of funding the major new road infrastructure associated with the South Godstone Garden Village, following a rejected HIF bid (appendix 8).

8.6. Although the Council has prepared information with respect of costs and delivery mechanisms for Tudeley, as indicates earlier in this submission the new settlement is not expected to contribute towards all the necessary infrastructure i.e. the Colts Hill off-line improvement (This is only included in the financial appraisals for development at Paddock Wood) which is required alongside the Five Oak Green bypass (which Tudeley is expected to contribute towards) (See the Viability assessment schedules in Appendix II of the Stage 2 Viability Appraisal). Furthermore, and notwithstanding the financial viability assessments not including all infrastructure, development at Tudeley is not as viable as indicated under the same range of variables as other schemes. Tudeley is reliant on lower existing land values and higher property values to show it is viable. The limited evidence that development at Tudeley is viable is a further indication of the unsuitability of the current strategy.

8.7. Exceptional circumstances do not exist for the removal of Tudeley village. Whilst a matter of planning judgement, the Council cannot therefore make such a judgement as this would not be consistent with their statutory duty (section 39(2)) and the revised NPPF. The points raised above confirm that exceptional circumstances do not exist, are not soundly based and therefore do not support revisions to the Green Belt at Tudeley Village.

10. OVERALL CONCLUSIONS

10.1. Our representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

10.2. As indicated in the representations, changes to policies of the Plan are advocated, including the borough's housing requirement in policy STR1.

10.3. To ensure adequate supply of housing arises, the land at Chittenden Fields, north of High Street, Hawkhurst should be included as a housing allocation for approximately 70 dwellings.

10.4. These matters can be addressed through Main Modifications to the Plan allowing for a Sound Plan.

11. FINAL REMARKS

11.1. We trust the above comments are of assistance in preparing the necessary main modifications to provide for a sound Local Plan.

11.2. We welcome the opportunity to engage in constructive dialogue with the Council in relation to our observations, including the allocation of our client's site at Chittenden Fields, Hawkhurst.

11.3. Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Inspectorate for examination.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3

8.8. To address these matters of soundness, a range of amendments are proposed:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

8.9. To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

1. That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e. the policies map to ensure that the Tudeley site is retained in the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To clarify any points the Inspector has with respect of the detailed representations submitted

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_112a-o

Comment

Agent	Mr Steve Brown [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woolf Bond Planning
Address	The Mitfords Basingstoke Road READING RG7 1AT
Consultee	[REDACTED]
Company / Organisation	Millwood Designer Homes Ltd
Address	Bordyke End 59 East Street Tonbridge TN9 1HA
Event Name	Pre-Submission Local Plan
Comment by	Millwood Designer Homes Ltd [REDACTED]
Comment ID	PSLP_1870
Response Date	03/06/21 14:44
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	APP06S~1.PDF APP10E~1.PDF App 01d P318 LP 1001 - Site Location Plan.pdf App 04 Sevenoaks DC v CLG [2020] EWHC 3054.pdf APP08T~1.PDF APP02I~1.PDF App 03 Sevenoaks Final Report Mar 2020.pdf App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf APP09U~1.PDF APP01A~1.PDF (1) APP01B~1.PDF App 11 PP SPG Benenden Iden Green CAA.pdf App 01c Figure 3 Landscape.pdf App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf

Data inputter to enter their initials here KJ

Question 1

Respondent's Name and/or Organisation Millwood Designer Homes Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: full representation attached has been separated into Policy STR1 (PSLP_1859, Policy STR9 (PSLP_1868), Policy PSTR/BE1 (PSLP_1869), Policy STR/SS3 (PSLP_1870) and Policy EN15 (PSLP_1872). See also appendices attached].

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the

legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our client's (Millwood Designer Homes Ltd) control the land on the west side of Iden Green Road, Benenden (Site Ref: 222). This site has been promoted through the earlier stages in the Local Plan as an additional location for growth in the Borough, taking account its credentials as a sustainable location for growth adjoining the acknowledged suitability of Benenden, as indicated in the Council's SHLAA. In contrast to other locations, the development of new homes at the site will ensure the embedment of behaviour associated with the sustainable living unlike other locations in the Borough, especially the new community proposed at Tudeley Village.

1.2 Further to our submissions on earlier stages in the preparation of the Local Plan, the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing." Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing infrastructure and services such as those available at Benenden which include those relating to education, leisure and retail and will support the continuation of them as advocated by paragraph 77 of the NPPF. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.3 Having regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village and the allocation of deliverable sites in sustainable locations, including land controlled by our client's to the west of Iden Green Road, Benenden. The site affords a sustainable opportunity in helping to meet identified housing needs and could provide for approximately 28 dwellings, within walking distance from local services and facilities.

1.4 For the reasons detailed in this submission, growth at Benenden would support the long-term provision of services within the village reflecting the approach advocated in the NPPF (paragraph 77). This would result in the achievement of sustainable development.

1.5 The reports and documents submitted with this representation demonstrate the suitability of the approach advocated. As detailed in the representations, this land is not subject to constraints which would prevent its delivery for development at an early stage during the emerging plan period should this be confirmed through the examination of the Plan.

1.6 We also have several comments/representations on the policies within the Draft Submission Tunbridge Wells Borough Local Plan which should be addressed prior to its submission for examination by the Secretary of State.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1. Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of submissions on behalf of Millwood Designer Homes to the Council's Draft Local Plan Regulation 18 Consultation (November 2019) (appendix 1)
- Copy of Inspector's assessment of the Tonbridge & Malling Local Plan (15th December 2020) (appendix 2)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (appendix 3)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (appendix 4)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (appendix 5)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (appendix 6)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (appendix 7)
- Tandridge LP Inspector's interim conclusions (11th December 2020) (appendix 8)
- Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (appendix 9)
- North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (appendix 10)
- Benenden and Iden Green Conservation Areas Appraisal (April 2005) (appendix 11)

2.2. Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy and extent of Built Development Limits

Objection

Policy STR9: Green Belt

Objection

Policy PSTR/BE1: The Strategy for Benenden Parish and the omission of land west of Iden Green Road as a housing allocation

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Policy EN15: Local Green Space

Objection

Omission site – Land west of Iden Green Road, Benenden (SHLAA ref 222) – failure to include as an allocation in policy PSTR/BE1

Objection

3. OVERARCHING POSITION

3.1. We have a strong belief in the principle of the plan-led system and in setting out our representations upon these policies, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2. We have considerable experience and expertise in dealing with and realising development schemes through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3. Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4. In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. This therefore indicates that the Plan must seek to deliver the minimum of 14,364 dwellings between 2020 and 2039 rather than 12,204 dwellings from 2020 to 2038 as currently envisaged.

3.5. To address this requirement for additional homes, we contend that land on the west side of Iden Green Road, Benenden, should be allocated for residential development (SHLAA Ref 222). This site can accommodate 28 dwellings and as indicated in these representations and the supporting documents would be a sustainable addition to the village.

3.6. The representations also highlight a failure of the plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of land of the west side of Iden Green Road, Benenden can also supply homes to resolve this issue. As detailed in the representations, the land west of Iden Green Road site would be a logical addition to the existing development in Benenden and should consequently be included in the defined extent of the village.

3.7. We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the authority.

3.8. We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1. Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2. A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3. In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4. Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5. The Local Plan should seek to meet the Council's full housing need. However, we have concerns regarding the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the Borough's development needs.

4.6. For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7. These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government's planning advice and policy. They also advocate changes to the extent of the defined settlement area of Benenden together with amendments to other policies of the plan.

4.8. These amendments would reflect our view of the clear sustainability advantages of growth at Benenden (Consistent with paragraph 77 of the NPPF) in preference to unsustainable locations where development conflicts with the approach of the NPPF i.e. Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9. Furthermore, to address the additional identified housing need, we advocate that land on the west side of Iden Green Road, Benenden (SHLAA ref 222) should be included as an additional allocation within draft policy PSTR/BE1.

4.10. The remainder of this submission is focused on providing responses to the Council's draft policies in the Local Plan.

8. POLICY STR/SS3: THE STRATEGY FOR TUDELEY VILLAGE

8.1. Through policy STR/SS3, the Council seeks to remove land from the Green Belt for the delivery of a new village at Tudeley.

8.2. For the reasons detailed below, we object to the proposal in that it entails the removal of very significant areas from the Green Belt for which there is no justification. This is both with respect of the scale of housing development envisaged as detailed in the representation to policy STR9. As we do not consider that very special circumstances have been demonstrated, this is a further indication that no revision to the Green Belt should occur at Tudeley as detailed in the representation to policy STR9.

8.3. As noted in the SA, to enable the delivery of Tudeley, significant infrastructure improvements will be required. This includes provision of new offsite roads (a new link road to the A228 and A228 improvements) to serve the site together with utility services, education, community, health and leisure facilities. For these factors, no indication has been provided in the current Draft infrastructure Delivery Plan of the costs or delivery mechanism of these investments. Without this information there is no certainty that the Plan can be delivered and consequently would be effective.

8.4. The Plans prepared by both Uttlesford Council (appendix 9) and the North Essex Authorities (appendix 10) failed with respect of some of the new settlements envisaged as the costs assumed were unrealistic and did not include sufficient contingency.

8.5. The Tandridge Local Plan has significant doubts with respect of the uncertainty of funding the major new road infrastructure associated with the South Godstone Garden Village, following a rejected HIF bid (appendix 8).

8.6. Although the Council has prepared information with respect of costs and delivery mechanisms for Tudeley, as indicates earlier in this submission the new settlement is not expected to contribute towards all the necessary infrastructure i.e. the Colts Hill off-line improvement (This is only included in the financial appraisals for development at Paddock Wood) which is required alongside the Five Oak Green bypass (which Tudeley is expected to contribute towards) (See the Viability assessment schedules in Appendix II of the Stage 2 Viability Appraisal).

8.7. Furthermore, and notwithstanding the financial viability assessments not including all infrastructure, development at Tudeley is not as viable as indicated under the same range of variables as other schemes.

8.8. Tudeley is reliant on lower existing land values and higher property values to show it is viable. The limited evidence that development at Tudeley is viable is a further indication of the unsuitability of the current strategy.

8.9. Exceptional circumstances do not exist for the removal of Tudeley village. Whilst a matter of planning judgement, the Council cannot therefore make such a judgement as this would not be consistent with their statutory duty (section 39(2)) and the revised NPPF.

8.10. The points raised above confirm that exceptional circumstances do not exist, are not soundly based and therefore do not support revisions to the Green Belt at Tudeley Village.

11. OVERALL CONCLUSIONS

11.1. The representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

11.2. As indicated in the representations, changes to policies of the Plan are advocated, including the borough's housing requirement in policy STR1.

11.3. To ensure adequate supply of housing arises, the land west of Iden Green Road, Benenden should be included as a housing allocation.

11.4. These matters can consequently be addressed through Main Modifications to the plan allowing for a Sound Plan.

12. FINAL REMARKS

12.1. We trust the above comments are of assistance in preparing the necessary main modifications to provide for a sound Local Plan.

12.2. We welcome the opportunity to engage in constructive dialogue with the Council in relation to our observations, including the allocation of land west of Iden Green Road, Benenden for housing.

12.3. Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Inspectorate for examination.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the approach to Tudeley village in policy STR/SS3

8.11. The Plan therefore as currently prepared is not sound with respect of:

a) It is not justified as the evidence does not support the removal of land at Tudeley for the garden community; and b) It is also inconsistent with national policy in the approach does not adequately reflect the guidance on considering all sustainable opportunities within the Green Belt before contemplating poorly located greenfield sites like Tudeley. It is therefore contrary to paragraphs 137 and 138 of the NPPF.

8.12. To address these matters of soundness, a range of amendments are proposed. The proposed changes are.

1. That policy STR/SS3 is omitted from Local Plan, alongside consequential amendments to other parts of the plan i.e. the policies map to ensure that the Tudeley site is retained in the Green Belt.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To clarify any points the Inspector has with respect of the detailed representations submitted

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_76

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	International House Dover Place ASHFORD TN23 1HU
Event Name	Pre-Submission Local Plan
Comment by	Natural England [REDACTED]
Comment ID	PSLP_1470
Response Date	04/06/21 13:41
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	PSLP_1444_Natural England_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Natural England
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC - Full representation attached as Supplementary Information]

[TWBC: This representation has been input against Policies PSTR1, AL/RTW17, AL/CRS 1, AL/CRS 2, AL/CRS 3, AL/HA 4, AL/BM 1, AL/PE 1, AL/PE 2, AL/PE 3, AL/RTW 16, STR/SS1, STR/SS3, EN11,

Section 3, STR 8, Section 5, EN1, EN9, EN10, EN12, EN13, EN14 AND EN19 – see Comment Numbers PSLP_1444, PSLP_1459, PSLP_1460, PSLP_1462, PSLP_1489, PSLP_1463, PSLP_1464, PSLP_1465, PSLP_1466, PSLP_1467, PSLP_1468, PSLP_1469, PSLP_1470, PSLP_1472, PSLP_1478, PSLP_1480, PSLP_1481, PSLP_1482, PSLP_1483, PSLP_1484, PSLP_1485, PSLP_1486, PSLP_1487, PSLP_1488]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Appendix 4: Strategic site allocations in the setting of the High Weald AONB (STR/SS 1 and STR/SS 3)

Natural England advises that careful consideration is made regarding the significant level of development allocated in the setting of the AONB. This includes the draft allocation for 3,490-3,590 dwellings at Paddock Wood/East Capel (STR/SS 1), and the draft allocation for 2,800 dwellings at the garden settlement at Tudeley Village (STR/SS 3). Whilst in principle we do not object to these allocations, we advise a sensitive approach be taken regarding the significant impact the proposals may have on the AONB setting.

Natural England welcomes the policy commitment to produce Framework Masterplan SPDs to set out how these strategic allocations will be designed and delivered. Natural England advises that these sites should be very sensitively designed, using a landscape-led approach informed by the AONB management plan, to ensure the impacts to the setting of the AONB are avoided and mitigated. Sensitive design can include reflecting the local vernacular in terms of built design and materials, respecting existing settlement morphology, and how that settlement relates to the wider landscape both visually and in terms of physical connectivity, and supported by appropriate green infrastructure.

Natural England recognises that further detailed policy will emerge as the master-planning work continues and the supporting SPDs are produced. We advise that improvements should be made to the proposed policies for any subsequent policy writing for these strategic site allocations. Making changes at this early stage should help to ensure that appropriate masterplans are produced and high-quality development that maximises environmental gains comes forward. This should help TWBC to achieve its stated vision of new, sustainable infrastructure and excellent service provision (point 5.179 regarding Paddock Wood) and the highest standards of design (point 5.199 regarding Tudeley

Village), while also helping to address this substantial level of development within 0.7 mile of the High Weald AONB.

We are committed to working with TWBC to help secure sensitively-designed and sustainable development for these strategic allocations and advise that TWBC also seeks and uses the advice of the High Weald AONB Unit.

Tudeley Village

We welcome the reference to consideration that should be given to key landscape characteristics (Policy point 7b). However, landscape impacts on the AONB and its setting require sensitive consideration given the scale and proximity to the AONB boundary. Therefore, Natural England advises that this policy is strengthened to make a landscape-led approach integral to the policy for this strategic development by making the following improvements:

- require a high quality and detailed Landscape and Visual Impact Assessment (LVIA) and landscape capacity study as part of the application
- strengthen wording around need for considerable detailed assessment of mitigation options, including quantum, location, density, height and design of buildings
- require an overarching Green Infrastructure (GI) strategy for the garden settlement which includes a functional assessment of existing GI assets and apply consideration of the needs of the new community. This should include what function is needed and where, and what type of GI is needed to deliver it, and how this will be managed in the long-term.

We welcome principle 8 (point 5.223) which commits to good quality green and blue infrastructure. Given the impacts and opportunities that come with this scale of development, we advise that the wording is strengthened to show a clear commitment to delivering environmental net gains. Instead of 'considers opportunities', we suggest wording that looks to embrace the opportunities by delivering environmental net gains should be used. This should be integral to this strategic development from the outset.

As part of this, we advise that this strategic site allocation is given particular consideration within TWBC's upcoming SPD for Biodiversity Net Gain (EN 9), given the opportunities for taking a nature recovery network approach when designing and planning at this scale that maximises the benefits of biodiversity net gains through connected ecological networks that support local priorities. As part of good quality green and blue infrastructure, we also advise that Sustainable Drainage Systems (SuDS) that maximise landscape and biodiversity value are prioritised and should be mentioned in the policy. Policies should also make it clear that any green infrastructure is managed and maintained. These suggested changes should be made within the policy summary itself to give them an appropriate level of emphasis.

We recognise that point 5.228 suggests that the provisional LBDs are not fixed at this point and we advise that these should be determined by landscape-led approaches and ecological considerations, including consideration of ancient woodland that is adjacent to the site. This should be supported by appropriately detailed ecological studies carried out at key stages of the masterplan and early design.

We suggest that point 5.229 should be stronger by making the following wording changes: 'The SPD will need to be adopted before any planning permissions for ~~substantial~~ new development at Tudeley Village are granted, **which would be considered to pre-empt the vision of strategic development before it has been appropriately scrutinised**, unless exceptional circumstances arise' We welcome point 5.227 and suggest this would be stronger if it directly references national and local net-zero carbon commitments and the climate emergency, to ensure it is clear what is being targeted here.

Paddock Wood and East Capel

There are several comments made regarding Tudeley Village which also apply to Paddock Wood, including our advice that environmental net gains should be an integral part of the strategic policy, the importance of taking a landscape-led approach, including for determining the LBDs, and the reference to net zero carbon targets (point 5.188).

We support point 5.161, which promotes the design principle of maintaining a strong tree belt and its connection with nearby ancient woodland (point 5.162).

We welcome the principle of using nature-based solutions that is evident in proposals for Paddock Wood Wetlands Park as a significant new area of natural open space which provides multiple benefits.

We are pleased to see the recognition that this strategic site should be a source of reducing flood risk, particularly given the land that is in flood risk zone 2/3 and advise that a policy requirement is added that will require SuDS and Green Infrastructure as an integrated part of future development due to the multiple benefits this can bring including ecological enhancement.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Natural England welcomes the reduction in scale and number of major development site allocations within the AONB since the Regulation 18 stage of the draft local plan, but we do not consider the current draft local plan to be sound and have highlighted our reasons in our full response letter for this regarding the remaining major development allocations within the AONB. We advise that these allocations should not be pursued, and alternative options should continue to be explored. While we have objected to major development proposed within the AONB, we remain committed to the plan-led scrutiny of the proposals to ensure soundness of approach, which enhances the High Weald's highly valuable and special landscape for future generations. We wish to work with TWBC to help ensure the best possible outcomes for the AONB and the environment.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Natural England are a statutory consultee for local plan consultations and, under the CROW Act, have powers regarding AONBs. The development strategy and major development allocations within the AONB are the core reason for why we consider the local plan as unsound.

In addition, Natural England objected to a planning proposal (20/00815/FULL) for the Turnden Farm site (AL/CRS 3) in 2020 and requested that the decision by TWBC to approve the development was called in by the Secretary of State. The proposal is now subject to a Public Inquiry which Natural England is engaged in as a Rule 6 party.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Appendix 3: Sustainability Appraisal

There are several alternative growth strategy options within the Sustainability Appraisal (SA) and the Council has chosen a growth strategy with significant negative landscape impacts. Natural England's view is that the preferred approach should afford sufficient weight to environmental factors. This is supported by NPPF Paragraph 8 which states that economic, environmental and social objectives need to be pursued in mutually supportive ways to support net gains across each of these objectives. Paragraph 32 also states that (emphasis added):

'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements (The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.)'. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). However, the SA appears to prioritise social and economic considerations over environmental ones as Section 6.2.19 states:

'The term 'preferable' is used in this sense to mean the option that has the highest scores for the economic and social pillars, and the least negative scores for the environmental pillar'

We also refer to Paragraph 11(b) of the NPPF which states that:

"b) 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;"

Given the provisions of paragraph 11 (and consequently paragraph 172), we consider that the weight afforded to protecting nationally designated landscapes has not been sufficiently considered as part of exploring alternative options and the environmental value of the AONB has been underestimated. It is our view that significant impacts have not been avoided as far as possible and, as outlined in other sections, we advise that major development within the AONB has not been appropriately justified. Given the above, we are concerned that the underpinning assessment and recommendations of the SA are not giving an appropriate level of consideration for the environmental benefits associated with alternative growth strategies, especially given the great weight that should be afforded to designated landscapes.

Natural England has significant concerns that the SA underestimates the value of avoiding major development within the AONB and the scale of impact of including it. The chosen growth strategy achieves a very positive score ('+++') for housing as it assumes it will meet standard housing need and local housing needs across the borough. However, it scores neutral or negative scores for environmental factors, including 'slightly negative' ('-') for Landscape, despite the scale and size of major developments directly within the AONB and its setting including the large strategic sites at Tudeley and Paddock Wood.

As outlined in other sections of this letter, our view is that we consider that securing effective enhancement and mitigation measures for major development within the AONB is very challenging and therefore scores for environmental/landscape factors are likely to be overstated in the SA conclusions. Similarly, the SA finds that sites such as Turnden (AL/CRS 3) are still allocated despite scoring a very negative score for landscape (Appendix J, Page 321).

Furthermore, for Growth Strategy 2 (no major development within the AONB), climate change is scored as negative ('- -' in table 14) despite having lower growth in the AONB and Borough compared with Growth Strategy 13 (adopted approach for Pre-Submission Local Plan) which includes higher growth and major development within the AONB but only scores slightly negatively for climate change ('-' in table 25). It is our view that Growth Strategy 2 would reduce carbon emissions associated with transport and new dwellings as well as carbon sequestration (which is not mentioned in the SA) when compared with Growth Strategy 13.

Given the scale of development within the AONB and its setting in the chosen growth strategy, we also question the neutral score given for biodiversity. While we support biodiversity net-gain, approaches should be in addition to applying the mitigation hierarchy which should aim to avoid negative impacts

on biodiversity in the first instance. As the SA states that nature conservation designations are more common in the AONB, we advise that any benefits for biodiversity (including those which contribute to the neutral score for the chosen growth strategy) are interpreted with some caution. Finally, point 3.2.8 does not reflect the findings of the HRA and mitigation proposed for Ashdown Forest SPA (see the HRA section below). We advise this section of the SA is amended to reflect the findings of the HRA.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

<input type="checkbox"/>	Yes, I wish to be notified of future stages of the Local Plan
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Supporting Information File Ref No: SI_53

Comment

Consultee	Gregg Newman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Hadlow [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Gregg Newman [REDACTED]
Comment ID	PSLP_909
Response Date	02/06/21 11:46
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Sustainability Appraisal response form_redacted.docx Sustainability_Appraisal_response_form.d (1).docx

Question 1

Respondent's Name and/or Organisation	Gregg Newman
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Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

I strongly object to "The Strategy for Capel Parish" (Policy STR/CA1).

I refer you to my comments in full contained in my response to the Draft Local Plan Consultation Response Form and Sustainability Response Form all submitted in detail in October 2019.

To reiterate for emphasis.

This is an ill thought out and ill-conceived proposal that will forever be a stain upon the consciences of any and all who are concerned should it become reality.

You dare to pay lip service to protecting the environment, whilst at the same time destroying the habitats of innumerable plant and animal species. Although on a smaller scale, there is no difference between your plans and the Brazilian Government's policy towards the Amazon Rain Forest (which you have doubtless wrung your hands over!).

Your plan will turn the area not into some idyllic "garden villages. It will tarmac and concrete over ancient woodland, and contribute to global warming and flooding. No amount of platitudes, half-truths and cynical distortions of facts in your so called plan will alter what this really is. Turning the Garden of England, the heart of our Green and Pleasant Land, into a soulless waste land of identical poorly constructed house with inadequate infrastructure, a ghetto well enough hidden from the residents of Tunbridge Wells so as not to offend their sensitivities.

Your plan will also, undoubtedly, result in injuries or even deaths to children who will have to travel miles on poor roads, in darkness, to get to and from school.

I could write reams, but it seems pointless. Everything has been said over and over again. Please, TWBC, deeply examine your consciences and show yourselves to be above the Westminster gerrymandering that is destroying our country, take a stand and protect England and this beautiful planet and all its inhabitants, not only human but plant and animal too.

I look forward to you restoring my faith in human nature, thank you.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_122

Comment

Consultee	J Newman [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	J Newman [REDACTED]
Comment ID	PSLP_1904
Response Date	03/06/21 21:27
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1904
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mrs Joanna Newman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
	Policy STR/SS 3 The Strategy for Tudeley Village
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Dear Sirs,

I believe that the planning is not effective in that it does not take into account a number of things. Firstly – infrastructure – roads and secondly flooding.

The B2017 is not fit for purpose to receive another 2000 houses/possible 4000 cars along this road going into Tonbridge. Even now, as we come out of lockdown the traffic is tailing back from Tonbridge for over a mile to the village of Tudeley. 18 months ago, before lockdown in the rush hour and during school pick up/drop off times there is too much traffic.

There is also a long queue of cars joining the B2017 at Tudeley Church, Hartlake Road. Mainly consisting of school parents, and workers who are trying to avoid Tonbridge (which is gridlocked) and who are trying to get to work in Tunbridge Wells and further south. The A26 has also long queues going back 2 miles towards Hadlow – hence people cutting through Hartlake Road.

There is talk of a pavement from Tudeley to Tonbridge – that will never happen as KCC refuse to even put in a pavement along the A26 from Hadlow to Tonbridge which is less than a mile in length. There is no way that this or a cycle path will be built.

Hartlake Road continues to flood every year as it is on the Medway floodplain. This puts added pressure on the B2017 as cars cannot cut across to Sevenoaks, Tonbridge North or any of the northern towns.

[TWBC: Photo attached as Supporting Information]

In the recent Rivers report highlighted by Ian Botham is showed that the sewage from both Tonbridge and Tudeley frequently overflows into the River Medway due to an old system and to too many people using the service and the river being too high.

How is the large community of Tudeley going to cope with this. According to Southern Water they have no plan to expand this or to improve it.

Tunbridge Wells Council and Hadlow Estates who are going to build this mini town in Tudeley also state that there will be a railway station. There is an old station which will never be reopened. This has been confirmed by senior personnel at SE Railways. So if only ¼ of the working population at this new town of Tudeley decide to work in London (which a majority in the vicinity do) they will have to drive to either Tonbridge or Paddock Wood to get a train. At the present time there is limited car parking and a waiting list. So this is not viable.

The new town of Kings Hill which was built many years ago on the old airfield had both houses and offices/industry on the same site. The idea being that people worked locally and could walk to their offices. If you travel to Kings Hill you will see that this is not the case. The majority of people in Kings Hill work elsewhere – travelling to the M20 or into Tunbridge Wells/Tonbridge and the offices employ people from Kent and Surrey/Sussex who drive in. The result being that in the rush hours the traffic does not move.

Putting another 6000 houses into the Paddock Wood/Capel/Tudeley area will cause a greater strain on the Kings Hill roads as everyone tries to get through Mereworth or along Seven Mile Lane to reach the M20.

Tunbridge Wells Council have said that they will widen the A228 by Colts Hill to take the extra traffic. However they have been talking about this for over 20 years and nothing has happened. Exactly like the A21 – which took over 30 years to get completed by the government. There is not the money for this project by KCC or by English Highways. So until all these roads have been widened and improved only then can Tunbridge Wells think about putting in more houses.

Question 6

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Roads – as above

Sewage – as above

Flooding – as above

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	Ms Alison Burchell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	NHS Kent and Medway Clinical Commissioning Group
Address	[REDACTED] [REDACTED] Ashford [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	NHS Kent and Medway Clinical Commissioning Group [REDACTED]
Comment ID	PSLP_1556
Response Date	04/06/21 09:16
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	NHS Kent and Medway Clinical Commissioning Group
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Number: 5.221

[TWBC: this representation has been input against Policies AL/RTW 8, AL/RTW 15, STR/CRS 1, AL/HA 5, STR/SS 3, PSTR/HO 1, PSTR/BM 1, STR/SS 1, PSTR/GO 1 and AL/HO 3– see Comment Numbers PSLP_1550, PSLP_1551, PSLP_1552, PSLP_1553, PSLP_1556, PSLP_1568 PSLP_1570, PSLP_1554, PSLP_1559 and PSLP_1569]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I can confirm that the CCG has been engaged in the local plan development process in order to assess implications for primary medical care provision. The impacts are set out in the IDP and will be regularly reviewed and updated in line with the CCG's GP Estates Strategy. The following comments are provided on specific policies in relation to general practice provision for completeness.

The Strategy for Tudeley Village Overview 5.221 Community facilities are considered an integral part of the vision for Tudeley Village, with the provision of both a primary and secondary school, community hall, village green, health facilities, and playing fields.

Policy STR/SS 3 The Strategy for Tudeley Village Secure developer contributions towards the strategic growth of this area and Land at Paddock Wood and east Capel, either in kind (normally land) and/or financial, as set out in the Strategic Infrastructure Framework November 2020 (or a version of this document as amended), to include:
d. health and medical provision;
Comment (covering Paddock Wood and Tudeley):

The above policies recognise the need for additional primary medical care provision and infrastructure. The infrastructure and delivery/timing requirements for this will need to be further developed. Please note the CCG position reflected in the IDP which highlights the need for facilities in both areas of development – both Paddock Wood and Tudeley. Of specific note (as detailed in the IDP) is the CCG's view that the population of Tudeley will flow to practices in the Tonbridge area in order to register with a GP, however there is not the capacity in these practices to accommodate this growth. Whilst more detailed planning is required it is considered that a medical centre facility should be provided for within Tudeley Village.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

No, I do not wish to be notified of future stages of the Local Plan

Comment

Consultee	Joanna Nightingale [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Whetsted [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Joanna Nightingale [REDACTED]
Comment ID	PSLP_1048
Response Date	03/06/21 11:24
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Joanna Nightingale
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I live in Whetsted with my husband and two children and have done so for 14 years. We moved here from a town because we wanted to live in a country village. If I had wanted to live in a community like Kings Hill I would have moved there. I work in London and commute by train and there is no way that the Southeastern network will be able to cope with any extra passengers let alone thousands. The roads around here can't cope with the traffic we already have. It can take 10 mins or 30 mins just to get into Tonbridge and there is no rhyme or reason to the congestion just SWOT.

I am writing to object to "The Strategy for Tudeley Village" (Policy STR SS 3

Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary in to Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road in sight of a big roundabout. That will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows).

Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

In addition to this the quarry in Whetsted Road is being re-opened anyway with plans (which I have objected to also) to expand massively. Whetsted Road can't cope with the amount of HGV's going in and out of Scripps as it is. This traffic has increased hugely since we moved in 2007. It is damaging the road and our houses with these HGVs rumbling along 7 days a week. It can't cope with any more traffic.

Stop the plans please. They are insane.

Joanna Nightingale

xxxx

Whetsted Road

Whetsted

Kent

TN12 xxx [TWBC: full postal address redacted]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Comment

Consultee	Dr John Nimmo [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel, Tonbridge Capel [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dr John Nimmo [REDACTED]
Comment ID	PSLP_819
Response Date	01/06/21 14:45
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	John A Nimmo
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR SS 3 for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Capel for 26 years, having brought up young children to adulthood and through education in the local area. I worked during my entire residence here, until retirement over 2 years ago. I have many local connections, including a local music ensemble and local cricket club. I enjoy working as a local activist in key issues.

During my years commuting to outer London via the A21, the traffic congestion has become very much worse. The journey time to access the A21 doubled in duration. Serious local flooding has occurred regularly while we have lived here and has had an enormous impact on the local community. Many households and businesses have been damaged due to repeated local flooding, with many householders having to find alternative accommodation and several businesses closing permanently. In some cases, insurance companies have not paid out.

I strongly object to the Borough Council's draft local plan to build housing developments at Tudeley Village (Policy STR/SS3) and at Paddock Wood including land at East Capel (Policy STR/SS1) because the proposed development is overwhelmingly inappropriate for such a rural location and there are strong specific arguments against the proposals, as follows...

1. Climate change - This is the greatest emergency ever to face the planet. It will impact all life, which is interdependent. Building 4,800 houses in the local area will generate an estimated 17,000 metric tonnes of carbon dioxide, due solely to producing the concrete for the foundations alone. This does not take into account the cement used for internal structures such as flooring, shingles, roadways, pavements and parking spaces. This scale of construction will increase the borough's claimed 3,4743 tonnes of carbon dioxide emissions in 2018/19 to over 20,000 of carbon dioxide, which includes the existing emissions. Given the climate emergency, and it is now an emergency, the Borough Council must live up to its commitment on climate change and alter its housing development strategy to further reduce the borough's emissions. Existing, vacant buildings in the centre of Tunbridge Wells could and should be regenerated and converted to housing. These brownfield sites have mistakenly not been prioritised, but this would be an ambitious strategy and it will have a much lower carbon burden on the borough. In addition, the immediate loss of trees and green vegetation due to the scale of building will add even further to the climate emergency by reducing the capacity of the local biosphere to act as a carbon sink. Planting new trees will not be enough to compensate; it will take 30 years to achieve any redress due to the vast loss of green vegetation in the local countryside.

2. Land subsidence - The British Geological Survey has recently published new data that shows that Kent is one of the key areas that will be affected by ground shrinkage due to climate change. The hotter and drier summers being driven by global heating mean that the ground under houses will shrink and crack, resulting in increased instances of property subsidence. Kent has extensive underlying clay formations which make it one of the four most vulnerable areas to loss of moisture. About a million homes were at risk in 1990 and this rises to 2.4m in 2030 and 4m in 2070. (<https://www.bgs.ac.uk/datasets/geoclimate-ukcp09-and-ukcp18/>). With increasing climate change

and repeated flooding and the potential for subsidence, this area is clearly not suited for housing development on this scale. Subsidence can lead to increased insurance premiums, depressed house prices and in some cases, require engineering work to stabilise land or property and the replacement of utility pipe-works. In 2019, the UK's official advisers, the Climate Change Committee, said it was shocked at the lack of proper plans for protecting people from heatwaves, flash flooding and other impacts of the climate crisis. Alternative sites should be sought with a lower shrink-swell risk rating.

3. Flooding/water supply - The local area has suffered many instances of flooding over a long period. The proposed new town is in close proximity to the natural flood plain of the River Medway and there is a risk that flooding could well impact Yalding, which already suffers regularly in times of heavy rain. The whole of the South East region is prone to lack of water; the reservoir at Bewl Water frequently suffers low levels in summer. Clarification is needed that proper professional research has been done to secure an adequate water supply for the region if the extra demand from the new town and 4,800 extra homes comes on stream.

4. Pollution - The proposed development will undoubtedly result in increased levels of many classes of pollutants. These include traffic-related tailpipe emissions, road dust, dust from tyre and brake wear, and noise pollution. In addition, light pollution and water runoff from concreted areas are also known hazards. All of these are known to cause serious damage to human health and to the ecosystem. The development itself, with new roads and increased traffic volumes will increase the levels of these pollutants. There is no level of air pollutants which can be safely breathed. It is hard to understand how the increased levels of any of these pollutants can be truly mitigated by Tunbridge Wells Borough Council's local plans, because no details as to how the Council will reduce any of these pollutants (as is their stated goal) are provided. Limits on pollutants will only become more stringent due to ongoing research. A landmark legal ruling in December 2020 by a London Coroner concluded that air pollution contributed to the death of 9-year-old Ella Kissi-Debrah. Following this ruling, it is only a matter of time before litigation and/or class action lawsuits against local authorities ensues. This will be driven by tighter levels on limits of pollutants, and fuelled by growing public awareness of the impact of pollution on public health, due to the failure of local authorities to adequately measure and adhere to legal limits on tailpipe-emitted pollutants.

5. Protection of green belt land - Certain areas of countryside are designated as green belt in order to protect it. With the current climate emergency and Covid-19 pandemic, there is increasing awareness of the importance of green spaces to the mental wellbeing of the population. Green belt land must be preserved. If not protected, zealous development will result in the permanent destruction of the green belt and further depletion of the associated carbon sink. This carbon sink is crucial for protecting the environment against carbon overload by converting carbon dioxide to oxygen. Even part of the AONB will be destroyed by the draft local plan. The local community values and cherishes its green belt land.

6. Affordable housing - A major benefit claimed by many councillors for the proposed development is the provision of affordable homes for local young people. The proposed development will not deliver such low cost housing, given that 3-, 4- and 5-bedroom houses form a significant part of the scheme. With closer proximity to Tonbridge rather than Tunbridge Wells, we can expect overspill from London and large towns to add greatly to the local population. Incomers will be attracted here to live in new housing, rather than young local people, resulting in a new commuter belt adjacent to the A21 and Tonbridge rail station with fast links to London. The development will add heavily to the congestion on the already busy local roads and highways, especially close to Tonbridge. Overall, the proposed development is overwhelmingly inappropriate for a such a rural location. A much more appropriate alternative site is available, situated at Castle Hill. This is closer to Tunbridge Wells town and is adjacent to much more appropriate and existing infrastructure, i.e. the A21.

7. Lack of engagement - The engagement of the Borough Council with the local community regarding these proposals has been completely inadequate. The Borough Council appears still to be withholding some critical documentation. It has therefore not been possible for many to understand the full scope and impact of the draft plan, and also to understand how to raise objections. In addition, many residents in the local community do not have access to the internet and so many of the public cannot be easily appraised of all the intricacies and workings of the process in order to understand and comment on the proposals. The Borough Council has not done nearly enough to compensate for this. Due to the Covid-19 pandemic restrictions, public meetings and protests have not been allowed. All this has conspired to put the Borough Council in a very advantageous and, frankly, unfair position to pursue the development, compared to the local community. Importantly, it must be stressed that many borough

councillors admitted publicly to being unable to access the necessary briefing documents before voting for the proposals. How can this be a fair and proper process!

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Given the arguments I raised in Question 5, the following modifications to the plan would be necessary make it sound...

1. Climate change - Given the climate emergency, and it **is** now an emergency, the Borough Council must live up to its commitment on climate change and alter its housing development strategy to further reduce the borough's emissions. Existing, vacant buildings in the centre of Tunbridge Wells could and should be regenerated and converted to housing. These brownfield sites have mistakenly not been prioritised, but this would be an ambitious strategy and it will have a much lower carbon burden on the borough.

2. Land subsidence - The British Geological Survey has recently published new data that shows that Kent is one of the key areas that will be affected by ground shrinkage due to climate change. The hotter and drier summers being driven by global heating mean that the ground under houses will shrink and crack, resulting in increased instances of property subsidence. Kent has extensive underlying clay formations which make it one of the four most vulnerable areas to loss of moisture. Alternative sites should be sought, in line with the British Geological Survey data, to identify more suitable locations with a lower shrink-swell rating and reduced risk of subsidence.

3. Flooding/water supply - Proper flood risk assessment needs to be carried out because of the persistent and costly flooding in the local area. Clarification is also needed that proper professional research has been done to secure an adequate water supply for the region if the extra demand from the new town and 4,800 extra homes comes on stream.

4. Pollution - The proposed development will undoubtedly result in increased levels of many classes of pollutants. These include traffic-related tailpipe emissions, road dust, dust from tyre and brake wear, and noise pollution. In addition, light pollution and water runoff from concreted areas are also known hazards. All of these are known to cause serious damage to human health and to the ecosystem. By regenerating vacant properties in the town centre, there will be less pollution all-round (tail-pipe emissions, brake, tyre and road dust) as public transport becomes the main mode of mass transit. Light pollution due to new developments would not occur in green belts areas. The risk of litigation and/or class action lawsuits against local authorities would be lessened if cognisance of that risk is realised and avoidance action taken.

5. Protection of Green Belt Land - Green belt land is supposed to be protected. There is increasing awareness of the importance of green spaces to the mental wellbeing of the population. Green belt land must be preserved in order to support human wellbeing and this can be achieved by building in alternative and more appropriate existing brownfield sites.

6. Affordable housing - A major benefit claimed by many councillors for the proposed development is the provision of affordable homes for local young people. The proposed development will not deliver such low cost housing, given that 3-, 4- and 5-bedroom houses form a significant part of the scheme. More affordable locations for young people should be considered with multiple occupancy properties created in the town centre from existing brownfield sites.

7. Lack of engagement - The engagement of the Borough Council with the local community regarding these proposals has been completely inadequate. Many issues, such as the Covid-19 pandemic impact on public gatherings, and the complexity of the process for lodging objections have conspired to put the Borough Council in a very advantageous and, frankly, unfair position to pursue the development, compared to the local community. Importantly, it must be stressed that many borough councillors admitted publicly to being unable to access the necessary briefing documents before voting for the proposals. How can this be a fair and proper process!

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Margaret Nimmo [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Margaret Nimmo [REDACTED]
Comment ID	PSLP_859
Response Date	02/06/21 10:14
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Margaret Nimmo
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR SS3 for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Capel Parish for 26 years with my husband and our two children, who were raised here and attended local schools. As a family, we participated in many activities around the village, including walking, cycling and sports. I enjoy retirement in the village, and I am an active member of Capel Cricket Club Ladies' Team.

I strongly object to both Policies STR/SS 1 Strategy for Paddock Wood including land at east Capel and STR/SS 3 Strategy for Tudeley Village. There are several key points which I would like to address in relation to this objection...

Green belt - 4,800 houses will be built on land which is currently designated as Green Belt, supposedly protected. The plan will require the Green Belt to be downgraded and destroyed in order to construct this development. In view of the recent Covid-19 pandemic and increasing awareness of the benefit of green spaces towards mental health needs, local communities require green spaces to support mental health and promote community wellbeing.

Local roads and transport - Existing local public transport is poor, with only a limited service due to infrequent buses. Due to the level of housing in the proposed development, an increased number of vehicles will use the local roads, adding to the existing congestion at peak times. This added congestion will be exacerbated by the new secondary school planned. The resulting poor traffic flow is very likely to have a negative impact on local businesses.

A new road is proposed between Five Oak Green and Capel, the so-called "Five Oak Green by-pass". This would also be entirely on Green Belt land, resulting in yet more destruction of the natural environment. If such a road is constructed, it will partition the Parish communities of Capel, Five Oak Green and Colts Hill. This will result in a separation of the three communities, thereby acting as a barrier to our community life. The villagers will be unable to walk to the only shop in the village, the local primary school and the village Community Hall.

This road will impinge onto Sychem Lane, and will likely require the compulsory purchase of working farmland used for grazing cattle, sheep and growing crops. If this land is taken, this will mean that the farmers using this land will lose their livelihoods as a result.

Hospital capacity / medical care - A new town with the proposed number of new homes in Capel will put much more pressure on the services at the Kent & Sussex hospital at Pembury. Adequate medical centres, fully and professionally staffed, will be necessary to support the greatly increased size of the local community. It is critical that the capacity of the hospital and medical centres are enabled to cope. Extra funding will be necessary for this, in order to cope with the increased local population, and it is not clear whether the funding will be made available in time. This needs to be in place first.

Flooding / water supply - Parts of Capel parish have long suffered from flooding. The proposed new town is in close proximity to the natural flood plain of the Medway. Runoff downstream is a further likely consequence. There is a risk that flooding could well impact both the existing and new development.

The whole of the South East is prone to water shortage; the reservoir at Bewl Water frequently suffers low levels in summer. There is likely to be serious pressure on demand at critical periods of low rainfall in the year, when the extra demand from the new villages and 4,800 extra homes comes on stream.

Natural environment - the destruction of the green belt land will adversely impact the natural environment and wildlife in the area. Loss of habitat and a reduction in the number of species will be unacceptable.

Air quality, light and noise pollution / mental health and wellbeing - the extra housing, cars, street lighting, water runoff and all that goes with a new development will lead to increased levels of pollutants in the air, resulting in poorer air quality. The carbon footprint will unquestionably increase, and this will be a contributor to climate change. In addition, noise and light pollution will increase in what is currently a rural, Green Belt area.

The quality of the environment in Capel will be irreparably damaged and changed for the worse, and forever, despite the growing awareness of the importance of green spaces to human health and wellbeing. It is hard to imagine that this is consistent with a desire for betterment of the parish, and it certainly will irreparably damage our existing local way of life.

Architectural heritage - the historic church at Tudeley is located beside where the proposed new housing development will be sited. All Saints' Church at Tudeley has windows designed and created by Marc Chagall, the world-renowned artist. Tudeley is internationally famous as the only church in the world having stained glass windows designed by Chagall, within its setting in the green fields of Kent. This precious architectural heritage will deteriorate when the surrounding fields are destroyed and the church is surrounded on three sides by the new town at Tudeley. This is just one example of the planned environmental vandalism.

Housing density - the amount of housing planned for Tudeley and East Capel is disproportionately located, with more than 50% of all new housing in the Borough of Tunbridge Wells being within Capel Parish. This means that the construction will negatively impact more upon the nearby Borough of Tonbridge and Malling, yet the income from the extra council tax will benefit Tunbridge Wells.

The houses planned include 3, 4, and 5 bedrooms. This will not be affordable housing which is what is required in the local area.

In conclusion, I contest that this draft Local Plan and the concept of the new town to be built on Green Belt land in Capel parish has been poorly thought out and rushed through. There has been little to no communication and consultation with the local community. It is an expedient answer towards meeting government-imposed targets, rather than being a solution which addresses true local needs. Further, there can be no justification for the destruction of Green Belt land and for ignoring the long-established legal precedents to protect the Green Belt.

Question 6

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This development is in the wrong place and has been rushed through with little consultation with local people and our needs. We have not been able to congregate during the Covid-19 pandemic to discuss together with our local community. There are alternative brownfield sites in the borough which have not been properly prioritised. Vacant offices and shops in Tunbridge Wells could be regenerated into homes which would help reduce the carbon footprint and help rejuvenate the town.

In addition, the Castle Hill site alongside the A21, which would be more suitable as the infrastructure is already in place, has been completely dismissed out of hand by TWBC with no sound justification.

Also, the proposal amounts to a disproportionate number of houses (over 50% of all new housing) in Capel parish compared with the other 19 wards in the TW borough. Tonbridge, the nearest town to a large part of the proposed development, will be greatly and negatively impacted by the vast increase in housing, while there will be minimal impact on the rest of TW borough. In addition, TWBC will benefit greatly from the increased revenue from council tax, but Tonbridge and Malling will not.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Siobhan O'Connell ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tunbridge Wells TN2 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Siobhan O'Connell ([REDACTED])
Comment ID	PSLP_1336
Response Date	04/06/21 15:40
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Siobhan O'Connell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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The creation of a new Garden Village at Tudeley will result in an enormous increase in the population Capel and loss of Green Belt/agricultural land. The amount of housing proposed is totally excessive and will result in traffic congestion and pressure on infrastructure such as water supply and sewerage.

The impact on the local environment will be enormous with loss of trees, farmland, and loss of AONB land.

Consultation with local residents has been very poor and far too little attention was paid to the many comments at Reg 18 stage. Insufficient effort has been paid to prioritise development of brownfield sites elsewhere in the Borough.

It appears that there has been insufficient effort to co-operate with TMBC which will have to provide services for many of the new homes.

Question 6

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Consideration could be given to the Castle Hill site as an alternative to Tudeley Village.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Martina Oldfrey [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Martina Oldfrey [REDACTED]
Comment ID	PSLP_1376
Response Date	04/06/21 16:51
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Martina Oldfey
Question 2	
Agent's Name and Organisation (if applicable)	None
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Unfortunately I am not sure which policies specifically I am referring to please forgive me.	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

No

If you consider that the Local Plan is not sound, please answer this question.

Question 5

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

I worry that the housing development is too big and will ruin rural countryside and biodiversity. This will have a negative impact on rural roads, traffic and flooding, which is already an issue where I live in East Peckham. I do not think that closing the railway bridge into paddock wood or heartlake Road are practical solutions. They will effectively cut off East Peckham from the surrounding communities, isolating us as a village. For example I work in Tunbridge Wells and my routes to work will be limited, our after school childcare is in paddock wood and we would have to take 4 mile detour along country lanes.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Not closing existing roads: railway bridge and heat lake road.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Yes, I wish to participate in hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

This amount of housing is not sustainable in a rural community and will disproportionate affect residents of East Peckham.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Joanna Osborne [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Joanna Osborne [REDACTED]
Comment ID	PSLP_1235
Response Date	04/06/21 11:13
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Joanna Osborne
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

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Question 5

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Response to Question 5

We have been resident in Five Oak Green for 30 years, married in Tudeley Church and raised our son in the village, who attended local schools and was a member of the local Scout Group, which we both assisted with as adults.

We know from current experience that traffic on the B2017 is disrupted outside Capel School at the start and close of the school day, and that it is not uncommon for the early morning traffic jam from the Somerhill Roundabout and adjacent school can back up to The Turmeric Gold Indian restaurant, a distance of approximately 1.5 miles.

Five Oak Green and the surrounding area has flooded several times in the last decade, and our house being only 50 yards from the Alders stream, was lucky to avoid it. Flooding in the village is only now avoided by swift action by the Environment Agency who monitor and clear debris as necessary where the Alders Stream passes under the B2017 in the village. Our neighbours at Brook Cottage were flooded last year by the sewer that passes through their and our properties. During heavy rain the sewer often needs days of tankers pumping out a holding tank adjacent the B2017 at the Alders stream crossing point.

Although there is a lack of "affordable" housing within the parish, recent local developments – Foalhurst Woods for example, do nothing to address the problem – all any Developer will do is to provide the minimum required by law, and their definition of what is "affordable" leaves much to be desired, leaving most young people unlikely to ever afford to buy a house.

If the proposed developments at Tudeley and/or East Capel were to take place, these issues of traffic congestion, lack of infrastructure and potential flooding would only be exacerbated. Post Covid, there is now a greater emphasis on wellbeing, and the benefits of getting into the countryside, exercising and experiencing its nature and tranquillity. The peaceful rural landscape amenity that is currently available for everyone to enjoy would be destroyed by these developments which would effectively join Tonbridge, Capel and Paddock Wood as one sprawling entity.

We understand that Tunbridge Wells Borough Council (TWBC) have been set totally unrealistic requirements for new housing, by ill-advised Government targets, but they have conspired by choosing Tudeley as the location for this highly inappropriate development to place it right on their boundary with Tonbridge & Malling Borough Council (TMBC), who would have to bear the brunt of the vast majority of the increased traffic for both commuters, schools and the increased burden on local resources and infrastructure, Doctors, School places etc. We have not seen any evidence of a thorough consultation with TMBC or that its plans for increasing resources and infrastructure are commensurate.

The concern is broader than just the response of TWBC to the new housing demand, there is an issue with the demand itself. A borough with such a high proportion of land in AONB, heritage towns (RTW

itself) and green belt should have its target adjusted to take the quality of its land into account. TWBC should query this rather than slavishly accepting the unrealistic targets it has been set.

The loss of Greenbelt, its affect on the nearby AONB's and the loss of productive farmland would be unforgivable. Given the current fight to reduce global warming, and the need for more of the UK's food requirements to be home grown, thereby reducing our "food miles", paving over these areas should not even be considered.

Although undoubtedly the new developments would incorporate all the latest sustainable drainage systems (which are fine until they inevitably silt up), and the new housing would be protected from flooding by raising ground floor levels etc, they are being built on large areas of floodplain. The concern is the effect on all the existing properties in the area, which have seen flooding in the past, of paving over all these acres of land thereby reducing the ability of the land to absorb rain.

TWBC do not seem to have actively pursued other sites within the Borough, as the proposed scheme at Tudeley ticks all their boxes and the land has been offered to them on a plate by the landowner – Hadlow Estates, who unfortunately have a long history locally of selling off land/ properties in their ownership to the detriment of the local community, for financial gain.

As a consequence of these proposed developments it would appear that Five Oak Green needs a bypass. WHY? Given that most traffic from the Tudeley development would head into Tonbridge for the station, shopping, schools etc and that from East Capel would head into Paddock Wood for the same services, we would question the need for this. We believe the traffic analysis has been based on faulty assumptions about the direction in which the traffic will flow from each of the developments. Furthermore, post Covid travel patterns have changed so the traffic forecasts need a fundamental reassessment.

Siting a roundabout right next to Capel School on the B2017, which already has traffic problems seems to be dangerous for school children, not to mention the health effects on them from increased fumes. The route of the bypass would cut off Sychem Lane to vehicular traffic. The bypass route then cuts the last remaining commercial hop garden in the village in two. This hop garden has been expanded in recent years due to increased demand, and two local breweries use the hops from this field. When we arrived here 30 years ago the village was surrounded by hop gardens, now there is one left (for how long?). This not only represents local heritage, but heritage for Kent as a whole. High quality farmland is being lost.

This bypass then joins the proposed Colts Hill bypass (A228) at a roundabout. We thought that the whole point of the Colts Hill bypass was to improve traffic flow along the busy route that links Maidstone and Tunbridge Wells, and for the many emergency vehicles that use it daily accessing the hospital at Pembury. We do not see how traffic flow will be eased by having 3 roundabouts in half a mile (the existing one at the junction of the A228 and the B2017, the one at the end of the proposed Five Oak Green bypass and yet another proposed where Alders Road meets the Colts Hill bypass)

Alders Road carries a lot of traffic at peak times, and still will, Five Oak Green bypass or not. People currently use it to avoid the long queues of parked cars outside Capel School at morning drop off and afternoon collection, and delays in Five Oak Green due to on street parking, & bus routes/ stops. The proposed development and bypass would only serve to increase the traffic on this country road further.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_156

Comment

Agent	Mr Jonathan Buckwell ([REDACTED])
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Company / Organisation	DHA Planning Ltd
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Consultee	([REDACTED])
Company / Organisation	Owners of Land East of Transfesa
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Owners of Land East of Transfesa ([REDACTED])
Comment ID	PSLP_2076
Response Date	02/06/21 17:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.9
Files	DHA Planning for owners of Land east of Transfesa - full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Owners of Land east of Transfesa, Paddock Wood
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: the full representation attached has been divided between Policy STR/SS1 (PSLP_2076), Vision and Strategic Objectives (PSLP_2078), Policy STR1 (PSLP_2079), Policy STR4 (PSLP_2080) and Development Management Policies (PSLP_2081)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1.1 Introduction and Context

1.1.1 These representations have been prepared by DHA Planning on behalf of the owner of land at Land East of Transfesa in respect of the Tunbridge Wells Borough Council Regulation 19 Local Plan consultation.

1.1.2 These representations relate to a 20 acre parcel of land at land East of Transfesa, Lucks Lane (part of Call for Sites site 218) that forms part of the employment allocations proposed for the expansion of Paddock Wood.

1.1.3 Based on the current national and local planning context, we consider this the site to be suitable for development.

1.2 Local Plan Background

1.2.1 Tunbridge Wells Borough Council (TWBC) has produced a new Local Plan to guide future development within the borough. As the Council is now satisfied that it has a sound plan it proposes to submit the plan for Independent Examination following completion of this final round of consultation.

1.2.2 Once submitted, the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In this regard, the Government published a revised NPPF in February 2019, which provides that to be "sound" a local plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and

based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and• Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.2.3 This submission comment on the plan having regard to these tests of soundness as well as wider legal compliance.

1.3 Legal Compliance

1.3.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

1.3.2 The Council has undertaken public consultation at various stages. Furthermore, it has liaised with the development industry via Agents Forums and as such we raise no objection to this aspect of legal compliance.

1.3.3 From a wider perspective, and having regard to the duty to cooperate, there is concern in respect of the degree of cross boundary working and the extent to which Tunbridge Wells Borough has genuinely sought to assist with unmet housing need arising from neighbouring authorities. In this context, and owing to such concerns, it is essential that consented uses are maximised to their full potential.

1.4 Assessment of Soundness

1.4.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.4.2 The plan will set the agenda for development across the borough to 2038 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.4.3 This representation comments on the following elements of the plan:

- Vision and Strategic Objectives;
- Development Strategy and Strategic Policies;
- Place Shaping Policies; and
- Development Management Policies.

Place Shaping Policies

1.4.15 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site-specific allocations provide both strategic and development management guidance.

Policy STR/PW1

1.4.16 Policy STR/PW1 sets the Strategy for Paddock Wood and states that approximately 3,490-3,590 dwellings and accompanying infrastructure will be delivered via the planned extension to Paddock Wood.

1.4.17 We have **NO OBJECTION** to Policy STR/PW1.

Policy STR/SS1

1.4.18 Policy STR/SS1 sets the detailed strategy and states, amongst other things:

[TWBC: PSLP Policy STR/SS1 duplicated here - see full representation attached]

[TWBC: PSLP Extract of proposed proposal map for Paddock Wood - see full representation attached]

Comments in relation to Land East of Transfesa

1.4.19 My client SUPPORTS the proposals for employment development at Land East of Transfesa, which falls within the northern parcel (edged red) as shown on Map 27. This site represents a large part of site PW1_6 as identified in the Strategic Sites Masterplanning and Infrastructure Main Report.

1.4.20 In particular, my client **SUPPORTS** the inclusion of Land East of Transfesa within the proposed Policy STR/SS1 allocation and within the Provisional Limits to Built Development as shown on the Policies Map.

1.4.21 He confirms that in relation to this site, it is deliverable over the plan period. My client's proposals will help to deliver additional high quality employment in the manner envisaged, including a mix of employment types and sizes in order to support the balanced economic and employment growth of Paddock Wood. The vast majority of the site is outside of Flood Zone 3, and over half of my client's ownership falls within Flood Zone 1, which has the lowest risk of flooding.

1.4.22 My client's land is capable of being developed in accordance with the principles set out in the PSLP. This land can be developed to provide additional high quality employment provision, and is easily accessed on foot and cycle from the town centre and railway station via existing roads and footpaths. There is already very good access to the station via the network of footpaths to the south of the site.

1.4.23 The Strategic Sites Masterplanning and Infrastructure Main Report identifies that sewage capacity and the existing network's propensity to flood during storm Southern Water, it reports that there is likely to be a need to upgrade the sewage works capacity at Paddock Wood to accommodate planned growth. Whilst the scope of these works is as yet unknown, it could include additional land requirements taken from PW1_6. My client is agreeable to this in principle, on the basis that if some or all of the land is no longer required for this use, it should be allowed to be developed for further employment-generating development.

1.4.24 Whilst viability work has been undertaken in relation to the residential parcels at Paddock Wood, it is not clear whether a similar exercise has been undertaken in relation to the employment development. Planning policies should take account of the fact that there are a number of landscape, flood risk, biodiversity and other constraints on these sites and that development requirements, for example sustainability requirements such as those set out in Policy EN3, need to be reasonably balanced in order to ensure that development can sensibly proceed (see further discussion below).

1.4.25 Whilst the benefits of Design Review are recognised, and we do not object to the use of Design Review Panels being encouraged through policy, we do question whether their input at both the pre-application and post-submission stages for all applications within the SS1 masterplan area should be mandatory in all cases, regardless of the scale and nature of the proposal – which appears to be the case as Policy STR/SS1(5) is currently worded.

1.5 Summary and Conclusions

1.5.1 In summary, this representation has been prepared in response to the Tunbridge Wells Borough Council Pre-submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy ahead of Examination.

1.5.2 We fully support the proposed expansion of Paddock Wood to create a balanced mix of housing and employment development, including employment development at Land East of Transfesa. We confirm that our client's land is available, much of it is in Flood Zone 1, and that they are also willing to allow necessary expansion of the sewage works on the site.

1.5.3 We do however object to the detail of some of the development management policies as set out above, which we are concerned unnecessarily replicate the NPPF, whilst providing detail which could have the unwanted side effect of unnecessarily limiting and frustrating beneficial development.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_78a-c

Comment

Agent	Mr Troy Hayes [REDACTED]
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Company / Organisation	Troy Planning & Design
Address	[REDACTED] [REDACTED] London [REDACTED]
Consultee	Mrs Nichola Reay [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Paddock Wood Town Council
Address	The Podmore Building St Andrews Recreation Ground TONBRIDGE TN12 6HT
Event Name	Pre-Submission Local Plan
Comment by	Paddock Wood Town Council [REDACTED] [REDACTED]
Comment ID	PSLP_1477
Response Date	04/06/21 16:11
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1448-1479(not inclusive) Troy Planning for PWTC SI-2 Representation.pdf PSLP_1448-1479(not inclusive) Troy Planning for PWTC SI-1 Cover Letter Redacted.pdf PSLP_1448-1479(not inclusive) Troy Planning for PWTC SI-3 PW TC Response to Reg. 18.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paddock Wood Town Council

Question 2

Agent's Name and Organisation (if applicable) Troy Planning & Design

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: for other comments by Paddock Wood Town Council, please see Comment Numbers PSLP_1448-1456, PSLP_1461, PSLP_1471, PSLP_1474, PSLP_1475-1477 and PSLP_1479]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Tunbridge Wells Pre-Submission Local Plan – Paddock Wood Town Council Representation

Please find enclosed our representations to the Council's Pre-Submission Local Plan. These Representations are prepared and submitted on behalf of Paddock Wood Town Council (PWTC) and the representations are supported by the Paddock Wood Neighbourhood Plan Steering Group.

We also enclose the Council's Representation Form with our signature confirming that we do wish to take part in the Local Plan Examination Hearings.

We would like to point out that the majority of PWTC's representations to the Regulation 18 consultation were not addressed by TWBC. Given that the Local Plan has changed very little between that earlier consultation and the current period of representations on the Regulation 19 Local Plan we enclose these earlier representations and request that TWBC takes these into account and ensures they are supplied to the Secretary of State if the Council decides to proceed to submission stage.

We request that you please include this letter as part of our formal representations.

Our representations conclude that the Local Plan and its evidence base fail all the tests of soundness set out in the National Planning Policy Framework (NPPF) and that the Local Plan is not legally compliant.

Our representations go to the heart of the soundness and legality of the Local Plan, its policies, and the process TWBC has undertaken in preparing its Local Plan. We therefore consider that the entirety of the Local Plan is unsound as it is not legally compliant. Whilst we have singled out a number of specific policies that we consider to be unsound it would simply not be possible to comment on every single policy in the Local Plan which is a 515-page document.

We trust that TWBC appreciates the importance of the Local Plan proposals to the Paddock Wood community in terms of the inappropriateness of the proposals which would, if the Local Plan in its current form were to be implemented, have irreversible negative impacts on Paddock Wood and the wider area.

We urge TWBC to reconsider its development strategy which is set to fail at Local Plan Examination in Public and to restart the Local Plan process using an evidence base led approach which would conclude that Paddock Wood is an unsuitable and unsustainable location for strategic housing growth. Such an approach would save TWBC, the taxpayers and all the stakeholders involved in the Local Plan process an enormous amount of time and resources debating a Local Plan which is clearly unsound and not legally compliant.

1 Viability

19.1. Please note we raise a number of points regarding Local Plan viability in the 'Infrastructure' and 'Garden Settlement Principles' sections. Viability of the Local Plan and particularly proposals at Paddock Wood and Tudeley will need to be fully tested at Local Plan Examination and we wish to take part in those hearings. The scale of infrastructure required to support at Paddock Wood and Tudeley will need to be justified in terms of viability and there must be absolute clarity on the phasing and timing of such infrastructure, the amount of funding that will need to be in place when, who will be responsible for the delivery of the infrastructure and contingency plans. The Development Strategy and Infrastructure Delivery Plan lack details and certainty on all the key elements required to ensure sustainable development can be delivered.

19.2. Given the above, the Local Plan viability study should take a 'worst case scenario' view on viability – there are countless examples across the country where viability matters for strategic proposals have not been scrutinised closely enough which has resulted in stalled sites and a lack of sufficient infrastructure to support the communities being planned. Given that the Local Plan proposes that the strategic development at Paddock Wood and Tudeley should be delivered using Garden Settlement Principles, and given the exceptional need for flood risk mitigation infrastructure and new infrastructure to support this growth, TWBC and its residents cannot afford for the viability study to be a 'high level' assessment which lacks all the finer grain detailed analysis that everyone knows is required to fully understand the challenges presented by TWBC's development proposals.

[TWBC: for full representation, please see supporting documents]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Paddock Wood Town Council confirms that it wishes to participate in the Local Plan Examination hearing sessions. Given the scale of strategic development proposed at Paddock Wood and nearby at the proposed new settlement, its extensive representations, and its role as a statutory consultee, PWTC considers it critical that it has the opportunity to provide further input into the Local Plan Examination process including the hearing sessions to respond to other evidence and arguments put forward.

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-1 Cover Letter Redacted.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-2 Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here. [PSLP 1448-1479\(not inclusive\) Troy Planning for PWTC SI-3 PW TC Response to Reg. 18.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Andrew Palmer [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Andrew Palmer [REDACTED]
Comment ID	PSLP_1183
Response Date	04/06/21 14:51
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Andrew Palmer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Having grown up in the local village of Hadlow and lived in Tudeley since 2016, I know the Parish of Capel and the surrounding area well.

Positively prepared

The Local Plan has not been positively prepared, as it has not taken a realistic view on the cumulative impact of the Tudeley development on Capel, Tonbridge, and the surrounding area. It places a disproportionate burden on one area of the borough and is not supported by the community.

The level of engagement undertaken with neighbouring local authorities, other agencies and residents has been inadequate, with important documents being very difficult to locate. It has also been felt that representations have been generally disregarded.

Justified

The Local Plan is not justified, as inadequate consideration has been given to alternative brownfield sites or other locations within the borough. The provision of approximately 2,800 houses has not been proposed in response to local need and will target people who wish to move out of London.

The proposal also does not present the exceptional circumstances needed to justify development on designated Green Belt.

Effective

The Local Plan is not effective, as the proposal is unsustainable. The effect of the increase in traffic along already busy roads and lanes, that are without lighting or pathways, has not been properly addressed. Intended measures to mitigate environmental damage, the loss of Green Belt and increased risk of flooding are also unrealistic.

It does not acknowledge the high number of listed heritage buildings and farmsteads, that are affected by Tudeley Garden Village. The development will cause irreversible damage to much of their historic setting; with the fabric of many buildings being put at risk by the increase in traffic and heavy freight, and by road widening schemes and the increased risk of flooding.

The Local Plan will destroy the historical, rural setting of All Saint's Church, which receives visitors from all over the world. The future integrity of the Grade 1 listed building and its unique Chagall windows will also be put at risk through the urbanisation of the surrounding ancient farmland and associated increase in footfall.

Consistent with national policy

The Local Plan is not consistent with the national planning policy framework. It is also in direct contravention of TWBC's own policies for landscape, environment, and sustainability.

It makes inadequate and unrealistic proposals for mitigating the departure from national policies concerning climate change, and for the need to protect the natural environment and wildlife which will be under threat from Tudeley Garden Village.

The response by TWBC to national planning guidance is illustrated by the proposal to build a major roundabout on the B2017, directly opposite Capel Primary School. This will be contrary to current guidance to avoid schools being located near busy roads, and will be detrimental to the health and wellbeing of pupils and staff as air quality is affected by pollution from the increase in vehicles and heavy freight.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposal for the Tudeley Garden Village should be removed from the Local Plan. Greater consideration should be given for sustainable housing on existing brownfield sites and in smaller sustainable low-impact development.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

None.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Kaye Palmer [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Kaye Palmer [REDACTED]
Comment ID	PSLP_1060
Response Date	04/06/21 11:36
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Kaye Palmer
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I do not consider that the Local Plan has been positively prepared, as it has not taken a realistic view on the cumulative impact of the Tudeley development on Capel, Tonbridge, and the surrounding area. Councils have been advised to press ahead with their Local Plan process, but TWBC has made little concession to the fact that this is during a pandemic. It has been very difficult to discuss the proposals within the community or engage with the Council's Planners. No on-line "Zoom" meetings or surgeries have been offered to help navigate the Reg 19 process or the vast and highly complex documentation. The on-line exhibition is only concerned with the Local Plan process and does not explain proposals. The documents available on the TWBC website are extremely confusing to a layman, with poor search facilities and conflicting information provided. There has been a lack of transparency in the process with multiple, sometimes conflicting documents, seemingly randomly published at different times – to the extent that residents now have very different interpretations of the proposals and no easy way to find clarity, eg regarding the position of new roads.

Representatives of the Council have shown a breath-taking arrogance by advising residents that the village will definitely go ahead and there is little point in opposing it. Opposition from residents and the neighbouring authority of Tonbridge have largely been ignored. Early in the process TWBC attempted to by-pass the usual consultation process by omitting Tudeley village from incarnations of the Local Plan and only revealing it very late due to the persistence of the Parish Council. They then ignored the many thousands of objections submitted by the public, adjacent local authorities and other consultees at Regulation 18.

I do not consider the proposals to be justified in that there is no demonstrable local need for the new Tudeley village. There is not a local housing crisis, which would be demonstrated by widespread overcrowding and homelessness, but the proposed village will accommodate migration from the capital where out of control property prices, increased working from home and ease of commuting are causing residents of London to move into outlying areas. The majority of house sales in the Tunbridge Wells area over the last year have been to those leaving London rather than meeting a local need. I do not believe that Capel, or other villages in the South-East, should be sacrificed because of a failure in housing policy elsewhere.

I do not consider the proposals for Tudeley will be effective in maintaining a clear identity and separation of communities. The new village will result in over development between Tonbridge and Paddock Wood, with little to separate communities. I believe the highway proposals will be ineffective in managing the increased traffic movements resulting from the development, which will damage existing heritage

buildings, create pollution and harm well-being. The highway proposals will cause traffic to reach the queues entering Tonbridge or Tunbridge Wells faster, rather than resolve the actual problem. In the case of Tonbridge, this will shift the problem to the neighbouring authority to resolve. The Plan does not put forward plausible solutions to obvious key problems which will result from the construction of Tudeley Village relating to transport, climate change, heritage and ecology, but instead either states that these vital matters will be considered later in the process, or appears to be wishful thinking eg the Chief Planner advising a public meeting that highway problems will be resolved by the widespread use of the electric bicycle, or that existing wildlife will be happy to reside in wildlife corridors or bird boxes in the new residents' gardens.

The plans for Tudeley are against Government guidelines in that designated Greenbelt land should only be built upon in exceptional circumstances and then brownfield or redundant land might be considered. No compelling evidence has been provided that the only option available to TWBC is to sacrifice working farmland, with little or no existing infrastructure close by. The plan for Tudeley village is also at odds with Government commitments to climate change, protecting ecology and "home grown" food in a post-Brexit world. All Saints Church is stated to receive special treatment, but there are plans to surround it with new development, with a tiny buffer. Tudeley village is dressed up as being sustainable, but this is at the expense of existing sustainability.

Tunbridge Wells Borough Council's strap line "Love Where You Live" is redundant to the residents of Tudeley – we already do. However, for the last two years during a tumultuous time for the UK, we have had the additional stress of battling with our Council which rather seems to "Hate Where We Live" and is hell bent on destroying great swathes of our rural Green Belt community, with all its history, beauty, ecology, dark skies and ancient woodland which their predecessors have preserved for generations by enforcing statutory and policy procedures. The transformation of our farmsteads and hamlets into a new town is the latest in a series of low grade, poorly thought through projects through which TWBC displays its contempt for the communities it should serve. Alternatives have been ignored, including brown field sites and proportionate development of existing settlements with established infrastructures, in favour of building on a large swathe of virgin, agricultural land in the ownership of one landowner.

I have been a resident of Tudeley for the last five years with my family and I have no hesitation in saying that I love the beauty and character of where I live. I acknowledge that time cannot stand still, however, the ill thought through, but convenient, proposals to create Tudeley Village will destroy what is special and unique about our Parish, with no clear justification other than to meet a housing target in the easiest way possible. It is to be sincerely hoped the HM Inspector will direct the Council to draw up a new sustainable and sensible plan to the benefit of existing and future residents.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan should be modified to remove Tudeley Village and replaced with proportionate development in existing settlements and brownfield sites.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mandy Parkes [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Mandy Parkes [REDACTED]
Comment ID	PSLP_66
Response Date	25/05/21 22:09
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Amanda Parkes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I do not believe this part of the Plan should even be considered.

The proportion and scale of it is vast and would swamp the local area with a disproportionate amount of housing for this small rural parish.

I do not believe all avenues have been explored. There are countless Brown Field sites ready for redevelopment – they are just more expensive, and smaller sites. But surely this is what all Councils should be looking at – with so many disused urban buildings, we should be enhancing these empty buildings and their surroundings, and spreading the houses across the whole of the TWBC Borough. This would then allow the agricultural land to be used for its purpose, and the other green space surrounding it, for the enjoyment, and physical and mental health of all local residents.

I believe TWBC have been lazy and greedy – putting 50% of their perceived housing needs for the whole area into one tiny parish, as in this part of the Plan they only have to deal with one landowner, and one site. And it does not escape any of the local resident's notice that all the Council Tax would be taken by TWBC, but the impact to services would land on TMBC.

It is outrageous that the local population would be increased by 500%!

Many of the local residents, including myself, moved from London because we wanted a different life, with clean air, green space and less noise. Whilst I appreciate the need for housing, this level of increase is wholly unacceptable.

All the housing is to be built on Green Belt land.

The Green Belt was put in place to protect urban sprawl, and the vastness of this proposal would eradicate nearly all of it, and essentially link Tonbridge to Paddock Wood.

What is the point of designating land as Green Belt, if that means nothing? I work as a local estate agent, and used to be able to say to potential buyers "this is Green Belt, it won't be built on". Now, it appears, I can never say that, as Green Belt is no longer protected as such. The words are worthless, and more and more Green Belt is sacrificed to concrete.

This land is valuable agricultural land, and there is need for local agriculture

There is a great need for crops, grazing, orchards, hops etc to supply the local community with food. This in turn also creates many jobs for local people. In order to cut greenhouse gases, food should be supplied locally, as far as possible. This avoids transportation and pollution, and gainfully employs the local residents. The land in Tudeley has been farmed for hundreds of years.

Local Employment

Local residents have been employed in agriculture for generations, with those particular skills. All these people would then have to retrain for jobs, if the agriculture was not there – not always possible if they do not have the right education or skill sets, and it would be dependent on other local jobs being available, which is unlikely, particularly after the pandemic, with unemployment being at an all time high. TWBC may argue that the housebuilding itself would create local employment, but you can't simply switch from being a fruit grower to an electrician.

Flooding

This land soaks up, and uses efficiently, potential flood water. TWBC claim that they have invested in surveys, professional expertise, and many reports, to try to reassure us that this won't be an issue. Nature defies algorithms. I am not assured or confident that anyone can precisely predict what will happen with global warming and wetter winters. I have lived in my house for 20 years. In the last two years water has come right up to my doorstep – something I've not had in the preceding 18 years. My house sits on a slight slope, but the road on the North East side of my house, where there is a slight dip, fills with deep water during heavy rainfall, which is hazardous, particularly on dark nights. If all the surrounding land is built on, the 400 acres of farmland allocated for this part of the Plan will not be there to absorb it, nor the trees, that suck up gallons of it. I think the increased risk of flooding will be huge. There are many surrounding villages, such as Hadlow and Yalding that already have a problem. Tonbridge also floods now, in the Sainsbury's car park. However many drains are put in place, if all the avenues are already full, and the River Medway, there will be nowhere for the water to drain to.

Lack of engagement with local residents and TMBC

I found it absolutely incredible that TWBC claimed they engaged with local residents, communities and surrounding Councils. This proposed development has been shrouded in secrecy until the 11th hour. It has been in the planning for years, and yet local residents heard about it just two months before Regulation 18 was going to take place. I am incensed that they have the gall to state this – it has been cloak and dagger all the way and for as long as it was legally possible. None of the local residents (me included) heard anything about these proposals until May 2019, when there was very little time to respond.

I attended a TMBC Council meeting in November 2019, when local Councillors were discussing it. 17 local Councillors stood up and berated this plan, saying there had been no cooperation or discussions, and were furious that all the burden would be borne by them and not TWBC, who would be benefiting from all the Council Tax. They pointed out that most of the new residents would be commuters – all coming into Tonbridge on one already overcrowded road – the B2017 – all trying to park in the station car parks, which were already full, all shopping in Tonbridge, which does not have the capacity to cope, all wanting the grammar schools, doctors surgeries etc. Tonbridge cannot cope with the increase of population that 'Tudeley Garden Village' will have. So no cooperation or engagement was evident from TWBC with local residents or adjoining Councils. Quite the opposite.

Roads and Infrastructure

As I have mentioned above, there is only one main road going into Tonbridge from Tudeley – the B2017. This road is already overburdened with an enormous amount of traffic, and during school rush hour times it comes to a standstill. I live on this road. At busy times it is impossible to get anywhere fast. In non rush hour it has a constant stream of fast moving traffic, making it dangerous at times for me to get out.

As TWBC have not disclosed any firm plans for infrastructure it is difficult to object to them! However, I believe their plans may be to widen this road to include a bus lane. Firstly, I do not know how they would do this as there are so many houses along this road, making it impossible unless they compulsorily purchase many of them, although Hadlow Estate (who are offering all of this land) own a great many of them as they have been the workers cottages. Many of them are now rented by local people. Even if widening was possible, I'm not sure what it would achieve, except to increase the number of vehicles all converging more quickly and bottle necking into one road going into Tonbridge.

On a personal level, quite apart from the noise of even more vehicles going past my house, it would make it even more dangerous for me to get in and out of my house. I would have to cross two lanes of fast moving traffic if I turn right, plus join fast moving traffic. It would be a death hazard. The only alternative is that I would have to turn left, up to the also possible proposed roundabout at the junction of Hartlake Road, and then come back on myself, causing me massive inconvenience, and essentially living on a dual carriageway. The thought of it is horrendous.

Traffic

I have made some of my points of above, but this only concerns one particular road – the B2017, which is already overloaded with local traffic. To add the cars from another 2,800 houses, it will become as busy as a motorway, or a standstill log jam during school and rush hour times. But the whole area round Tudeley, Five Oak Green, Paddock Wood, and all the surrounding areas will become unbearable. The pollution will cause real problems to most of us, and getting anywhere fast will become a distant memory. This small rural area served by narrow country lanes will not be able to cope with the vast increase of traffic.

With the building of houses, and quarrying in the area, the roads will constantly have not only cars, but never ending lorries and heavy machinery traversing all of the narrow roads in the area. The vibrations of heavy vehicles literally make my house shake – my house has no solid foundations and I worry that consistent and increased heavy vehicles will cause physical damage to my property.

TWBC are suggesting cycle lanes. This is honestly the most ridiculous dream they have come up with yet. To cycle from Five Oak Green to Tonbridge or Paddock Wood is approximately 5 miles. Do they seriously think that a commuter is going to do this at 7am or 7pm, in the winter, in the dark and the cold? Or that a parent, taking their young children to school is going to do this? Or even a teenager going to school, with all their books and games kit? Or builders going to work with all their kit in the back of their vans? I actually can't think of a single category of people who will hop on their bikes to go anywhere. Even a fit middle aged person is not going to do this, to go and get their weekly shop from the supermarket. In percentage terms of people deciding to opt for the 'Green' option of cycling, I should imagine it would be less than 1%. So in reality, as well as all the construction vehicles, using our country lanes for the next 15 years, there will also be all the cars from 2,800 new homes. That's approximately 6,000 extra cars, using the few small roads, that will all converge into Tonbridge, Paddock Wood or a few to T.Wells.

Noise and air pollution

As noted above, with regards to traffic, the local neighbourhood will have to endure 15 years of heavy vehicles, machinery and building works. The noise from all this will be horrendous, plus all the dust and the dirt. This isn't just a few houses, over a year, being built on Brown Field sites – this will be years and years of industrial destruction and pollution.

Wildlife and Nature

We are so lucky to be surrounded by a diverse selection of protected wildlife, flora and fauna – birds and animals, reptiles, ancient and mature woodland to name but a few. These precious and irreplaceable assets form the very essence of our rural community. The wildlife and heritage landscape will be changed and eradicated for evermore, the whole area will be concreted over. It is so important to keep the balance of nature, and this will be totally destroyed. Our whole planet is being destroyed by humanity, and I, and millions of others, are trying desperately to give nature a fighting chance. This should be a top priority, not only in our area, but worldwide.

Question 7

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ian Pattenden [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Ian Pattenden [REDACTED]
Comment ID	PSLP_416
Response Date	30/05/21 20:15
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Ian & Angela Pattenden
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I wish to strongly object to "Strategy for Tudeley Village" (Policy STR/SS 3)

I have lived in the small hamlet of Tudeley with my wife for 35 years and we have two married grown up children who live locally with their families.

As senior citizens unfamiliar with planning policies and planning law and further overwhelmed by the sheer number of "planning speak" documents issued by TWBC for their Pre-Submission Local Plan Reg19 consultation, we find it very difficult to comment on the technicalities of the Plan. However anyone with any degree of common sense at all can see that this gross plan to dump 2,800 new houses along with the necessary infrastructures and civic amenities in a heritage rich greenbelt farming rural landscape is unsustainable, irresponsible, unviable and quite simply madness.

I believe an isolated so-called "garden settlement" vanity plan at Tudeley by the arrogant landowner, to build 2,800 dwellings is inappropriate and does not follow the principles of garden settlements defined by the Government as the settlement will be divided in two by the main line London/Dover railway line. Furthermore this proposed isolated settlement would significantly increase traffic flow into Tonbridge along the B2017, exacerbating the current extreme traffic congestion that exists on this road every morning and evening. This additional traffic will cause increased levels of air and noise pollution as the residents of this new settlement will want to use their private vehicles for the convenience of getting into their nearest town of Tonbridge, even with a proposed public transport bus link. People will not give up the independence of a private car.....fact.

Local housing need in Capel does not require 2,800 new houses therefore the majority of this new development would inevitably be taken up by people being drawn into the area, effectively becoming a heartless isolated commuter settlement. Many of these people will want to travel to London by trains which are already at capacity. I therefore consider this proposal to build a new isolated settlement on the Tudeley site to be unsustainable as it has no tangible transport hub, connectivity infrastructure or basic utilities such as sewerage treatment, water or electricity, nor any outline details of how this might be achieved. Furthermore, it has been reported that in the year ending 2020 there were almost 500 empty properties within the TW borough, an increase of nearly 50% above the 2019 figure. Why are these properties not occupied if there is a housing shortage? The Leader of the Council, in his forward to the PSLP, states "the Council feels that it has got the overall balance right".....????? What sort of scales are they using when they propose to dump more than 50% of the apparent housing need in Capel parish which currently comprises 2% of the borough population, please explain the logic.

Destroying valuable good quality grade 2 and 3 food producing agricultural farmland located in the middle of the Green Belt is reckless and irresponsible in the extreme and must never be allowed under any circumstances. In fact I understand that the Government requires there to be "exceptional

circumstances” before green belt can be considered for development, where are these “exceptional circumstances”???. By allowing this vanity project to go ahead it will deprive our future generations of this valuable and irreplaceable asset forever. Additionally, we must protect productive agricultural land to provide our food, and we also need precious green spaces for our well-being both physically and mentally as has been proven during the current Covid pandemic. Why destroy this important precious rural asset just because it is an easy planning option for the council planners based purely on one greedy landowner who is willing to sacrifice his privileged heritage purely for financial gain.

At this stage there are no proposals whatsoever being put forward by the Hadlow Estate for comment on infrastructure for roads, sewerage, water, electrical supply, etc. All very “finger in the air” strategy which we are constantly being told is normal at this stage of the planning process and will be sorted out later with a Masterplan. Yet other parts of the Borough would appear to have more details available for comment and already have much of the necessary infrastructure in place. The Tudeley site is a suspiciously late addition to this Local Plan process, being the easy option for a massive disproportionate portion of the apparent local housing need. TWBC planning department have passed on the complete design and development of this site to an inexperienced landowner (Hadlow Estate) with no apparent input or coordination with the other site in East Capel or the surrounding areas. There are numerous Brownfield and alternative sites within the Borough, including the urban regeneration of the town centre, which have been totally ignored but these are not so profitable for developers or land owners.
DEVELOPERS RULE?????

The Police, Fire and Ambulance services are already at capacity and often overstretched so the proposed creation of a large new town will only make this situation even worse. Furthermore, health and dental services within the area, to accommodate the possible additional 9,000 to 10,000 extra people, will be passed on to the adjoining Tonbridge and Malling Borough council, I am sure they will be very unhappy with this additional burden.

FACT...climate change is occurring and the introduction of 2,800 new houses and the necessary additional infrastructure and civic amenities, will add to this global catastrophe. By adding more carbon emitting sources and reducing the carbon sequestration of the land and associated flora and fauna will only exacerbate the situation. TWBC have signed up to be carbon neutral by 2030, how???. Additionally, much of Tudeley is located on a floodplain with risk assessments apparently based on old and out of date data; locating houses on or near a floodplain is irresponsible and deceitful as new unsuspecting homeowners will never get insured against flooding.

Due to the openness and topography of the area, the proposed dumping of 2,800 houses into this landscape, will destroy this beautiful and historic part of our Borough, including AONB setting, heritage sites, listed buildings and the many traditional ancient Kentish farmsteads. All Saints Church in Tudeley is the only church in the World to be the proud custodians of all stained glass windows designed by the renowned Russian artist Marc Chagall. These were commissioned by the Goldsmid family, owners of the Hadlow Estate, in tribute to their daughter who died in a tragic boating accident, and is buried in the family cemetery. People visit from all over the world to view these amazing windows and enjoy the wonderful views across the Kent countryside which inspired Chagall to undertake this commission in the first place.

No-one would want to view a housing development bordering the church graveyard. Furthermore the landscape has survived by successive farming over centuries to remain as northwest Europe's most intact medieval landscape, yet another important heritage asset to preserve for our future generations to cherish, protect and enjoy.

Being a rural area, Tudeley is blessed with a diverse and important list of birds and wildlife, many on the European red list of protected species and some endangered such as Bats, Great Crested Newts, Turtle Doves and field nesting birds such as Skylarks, Linnets and Yellowhammers. This legacy cannot be just brushed aside by statements that they will be relocated to somewhere else, this is wishful

thinking and a complete fantasy. The birds and wildlife will just decline in numbers and finally disappear into extinction. Ancient and established woodlands, currently located within farmland, will be surrounded by housing developments, a most unnatural environment which is surely going to affect the health of these important arboreal assets. Hedgerows will disappear leaving a barren and lifeless “man made” landscape devoid of wildlife, is this something planners will be proud to leave as a legacy for the future? Putting bird and bat boxes on houses, leaving some green spaces and other fanciful “conservation measures” in place, is only paying lip service to biodiversity net gain.

In summary, this proposed new town plan has been ill thought through, in indecent haste without any regard to the needs or comments of the community of Capel. There are other alternatives that should have been given the same due consideration, but the so called responsible Officers of the Council hastily “nodded through” this unacceptable plan cooked up between the TWBC planning department and a greedy landowner. The process of community engagement and consultation, Reg18, resulted in an unprecedented number of responses which have been totally ignored in this latest iteration of the Local Plan. No exhibitions or public consultations have taken place due to the Covid pandemic, only online “tick box” information cards masquerading as the “public consultation” process. Furthermore, council elections took place in the middle of this whole Reg19 process and as a result the composition of the Council has radically changed mid way, how can this be democratic? Lastly, the whole formal process of responding to the Reg19 consultation has been made extremely difficult, particularly to many elderly people within our parish without access to the Internet. How can this be a fair process for this life changing proposal?

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Alexander Pelmore [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Alexander Pelmore [REDACTED]
Comment ID	PSLP_862
Response Date	01/06/21 22:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Alec Pelmore
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
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Question 5

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I think this is the wrong development plan in the wrong location - specifically the local impact on the neighbouring villages will be immense:

Impact on traffic. I live on Hartlake Road (which runs north from Tudeley) which is very narrow in places; has two bridges one of which is very narrow; and in several places runs between ditches on both sides. It is a key cut-through for traffic on the A26 looking to get round the Cannon Way route round Tonbridge at peak times; and also takes a lot of traffic delivering children to the Somerhill schools. Thus at peak times (7.45 to 9.00 in the morning, 4.15 to 5.30 in the evening) it is extremely busy with traffic driving too fast for the hazards – we often see cars on their sides in the ditches and I spend my time picking up broken wing mirrors when I go litter-picking. In addition, cars parked on the side of the road when the Poacher is busy bring an extra hazard. The impact of the planned extra houses in Tudeley will almost certainly result in a major increase in this traffic and it will become more dangerous. The developers/council may respond that they will just close Hartlake Road which of course would seriously inconvenience locals, The bridge is the only crossing point of the river between Cannon lane and Branbridges some 10km - it would mean I would need to drive 10km to get to my neighbours!

the site should be in the AONB. The lines for the AONB were drawn rather arbitrarily and the land is only just outside the line. If you go east along Crockhurst Street past the Turner Gold and look north you will see one of the finest vistas of natural beauty in Kent; as worthy of AONB designation as anywhere in the county.

Impact on Tonbridge. The traffic in Tonbridge and the pressure at the moment on Tonbridge station and the railway are at bursting point. The planned extra housing will have a dramatic impact on this . Extensive Infrastructure in Tonbridge should be put in place and paid for by the developers before any housing development starts.

Question 6

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or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I see no problem with some small-scale in-fill development around Tudeley, but the scale of the plan is just too large.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Fiona Pengelley [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Fiona Pengelley [REDACTED]
Comment ID	PSLP_105
Response Date	10/05/21 17:31
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	

Respondent's Name and/or Organisation	Fiona Pengelley
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Question 3

To which part of the Local Plan does this representation relate?	Policy
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Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 Strategy for Tudeley Village

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Capel for 33 years. All my three children were born at Pembury Hospital. I have volunteered as a debt, housing and welfare benefit adviser at Paddock Wood Community Advice Centre since it was founded in 2012 and before that I worked for the Citizens Advice Bureau in Paddock Wood.

I object to the two policies written below.

Policy STR/SS 3 Strategy for Tudeley Village

I OBJECT TO the proposal to build a new town of nearly 3,000 homes at Tudeley in the parish of Capel on Greenbelt land.

The draft local plan is **NOT “Sound”**; It is **NOT “Justified”** and because it has **fundamental inconsistencies with National planning policy** it is **NOT “Effective”**.

TWBC has said that “if the draft local plan is agreed it will allow the Council to meet government-imposed housing targets in the way that is considered to be the most appropriate for the borough as a whole”.

How can the total destruction of Green Belt and AONB in the Parish of Capel be appropriate for the borough as a whole? It is totally disproportionate to put 5,000 new homes into one singular rural parish within the Borough and which currently only has 918 homes. Once these developments have been allowed then the number of future homes being built on the area will increase. The damage will have been done. Tonbridge, Five Oak Green and Paddock Wood will be joined together and therefore the buffer zone which greenbelt land provides will have been destroyed. We will have one urban sprawl. TWBC are not protecting our heritage but are destroying it.

The plan preparation process did not include Tudeley (sites CA1 and CA2) until after the Issues and Options Process in 2017. This means that the largest housing area in the plan did not go through most of the plan preparation process. Protecting Green Belt was a key priority for people who participated in the Issues and Options consultation.

The housing need calculated by the government can be reduced if it requires development of Green Belt land unless “exceptional circumstances” exist. The NPPF clearly states in paras 133 to 147 that green belt should only be released in exceptional circumstances BUT that housing need is NOT able to be used as “exceptional circumstances” to overrule AONB/Green Belt. TWBC has not shown what the exceptional circumstances are that would allow them to build on AONB and Green Belt.

TWBC commentated that the proposed site at Tudeley was more preferable to anywhere else in the Borough because they could deal with only one landowner.

TWBC has not shown that they have considered brownfield sites across the borough to build additional housing. Social housing is the highest priority for extra housing not 5 bedroom executive homes. Brownfield sites provide a far better site for social and affordable housing because they are close to existing amenities and public transport.

TWBC Greenbelt Study Stage 3 (March 2021) recorded that the impact on the destruction of greenbelt to be **VERY HIGH HARM AT TUDELEY VILLAGE AND CAPEL EAST**

The infrastructure has not been addressed sufficiently and the proposed Colt's Hill ByPass will destroy AONB land and cause further polluting and congestion on the minor roads in the Parish. The developer has included a train station in the plans for Tudeley New Town and National Rail have specifically stated that they will not build an additional station between Tonbridge and Paddock Wood.

TWBC received over 1000 comments on their proposed plan for a new town at Tudeley, 97% of these comments were objections. By including it in their Draft Local Plan they have shown a complete lack of engagement with the public response to Reg 18.

Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel

I object to the inclusion of land for development in East Capel in "The Strategy for Paddock Wood" (Policy STR/PW1). It is disingenuous for TWBC to include this land within its strategy for Paddock Wood in order to pretend that it is not dumping 5,000 houses in the parish of Capel. The site is in the parish of Capel not Paddock Wood.

This land is Green Belt land and should only be built upon if an "exceptional circumstance" exists. TWBC's own assessments in their Sustainability Appraisal show that Paddock Wood can expand and meet most of the plan's aims without using the Green Belt land at East Capel. The comment above about coalescence and the creation of a conurbation from Paddock Wood right across to Tonbridge is very relevant here, as is the land's use as a flood plain. Building here, even with flood risk mitigation and "betterment" could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the impact of climate change.

Question 6

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Remove Tudeley New Town and development at East Capel as they are being built on greenbelt and place the necessary housing on brownfield sites and within the town centres which need regeneration

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Martin Pengelley [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Martin Pengelley [REDACTED]
Comment ID	PSLP_103
Response Date	10/05/21 15:23
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Martin Pengelley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 for Tudeley village	
Policy STR/SS 1 for Paddock Wood, including land at east Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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TUNBRIDGE WELLS BOROUGH

DRAFT LOCAL PLAN (REGULATION 19)

Consultation 26 March to 04 June 2021

Name: Martin Pengelley

Responding as: An individual and local resident of 33 years

Address: Capel, Tonbridge, Kent TN12 [TWBC: part of postal address redacted to protect personal data]

OVERVIEW COMMENTS

Policy STR/SS 3 Strategy for Tudeley Village

I OBJECT TO the proposal to build a new town of nearly 3,000 homes at Tudeley in the parish of Capel and **OBJECT TO** the proposals for even more housing on Greenbelt land.

The draft local plan is **NOT "Sound"**. It is **NOT justified** and has **fundamental inconsistencies with national policy**, thus it is **NOT effective**.

The land to be used is Greenbelt and adjacent to AONB. To use Greenbelt land there needs to be "exceptional circumstances" and housing need is NOT sufficient to overrule Greenbelt.

In the press in 2019, TWBC has been quoted as saying "If the Draft Local Plan is agreed it will allow the Council to meet government-imposed housing targets in the way that is considered to be the most appropriate for the Borough as a whole." This confirms that the Council have been lead by the government targets, NOT by local housing needs. There is insufficient evidence that the local housing needs exist such that a new town at Tudeley, on Greenbelt land, is justified. The draft local plan does not provide evidence of the "exceptional circumstances" required to develop Greenbelt land.

Any consideration of this ill-thought through plan should take account of the fact that it comes from a council that proposed running up significant debt to finance a hugely costly theatre, a reckless proposal that was palpably not wanted by the people of the borough.

Taken together, **Policy STR/SS 3 Strategy for Tudeley Village** and **Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel** would lead to nearly 5,000 new homes in the parish of Capel. As the parish currently has around 900 homes, this level of development is NOT proportionate and is insensitive development for a rural parish.

FULL COMMENTS

We have lived in our home in Capel for 33 years. Our children were all born at Pembury hospital and have grown up here. The parish is a rural one, predominantly made up of Greenbelt or AONB countryside. That is what attracted us to move here and why we have enjoyed our lives here in the countryside. We are shocked that our local council can propose that the character of such a beautiful place to live should be destroyed. And that it should be done through ignoring the longstanding policy of protected Greenbelt land, simply due to central government direction rather than through a thorough assessment of actual local needs.

I OBJECT TO the Policy STR/SS 3 Strategy for Tudeley Village proposal to build a new town of nearly 3,000 homes at Tudeley in the parish of Capel and **OBJECT TO the Policy STR/SS 1 Strategy for Paddock Wood, including land at east Capel** proposals for even more housing on Greenbelt land in the parish of Capel.

The draft local plan is **NOT “Sound”**. It is **NOT justified** and has **fundamental inconsistencies with national policy**, thus it is **NOT effective**.

The land to be used is Greenbelt and adjacent to AONB. To use Greenbelt land there needs to be “exceptional circumstances” and housing need is NOT sufficient to overrule Greenbelt.

In press/BBC TV in Oct 2019, **TWBC** has been quoted as saying “If the Draft Local Plan is agreed it will allow the Council to meet government-imposed housing targets in the way that is considered to be the most appropriate for the Borough as a whole.” This confirms that the Council have been lead by the government targets, not by local housing needs. There is insufficient evidence that the local housing needs exist such that a new town at Tudeley, on Greenbelt land, is justified.

Jake Berry (Minister DHCLG) stated in April 2019 that: “the housing need figure is not a mandatory target. Local Authorities should make a realistic assessment of the number of homes their communities need, using the standard method as the starting point in the process. Once this has been established planning to meet that need will require consideration of land availability, relevant constraints and whether the need is more appropriately met in neighbouring areas... **The NPPF is clear that only in exceptional circumstances may a Green Belt boundary be altered, through the Local Plan process. Last year we strengthened Green Belt policy in the revised NPPF**”.

Brandon Lewis (Housing Minister 2015) stated clearly that “maintaining strong protection for the Green Belt is national policy and LAs are required to observe this. In the context of planning applications or appeals, **the policy is that unmet housing need alone will not amount to the “very special circumstances” to justify planning permission for inappropriate development on Green Belt.** We have repeatedly made clear that demand for housing alone will not change Green Belt Boundaries.”

- . 69% of the Tunbridge Wells borough is designated as an Area of Outstanding Natural Beauty (AONB)
- . There are 10 Sites of Special Scientific Interest (SSSI)
- . 22% of the borough's land is designated as Green Belt (Source: TWBC website, Key Borough Statistics)

Consequently, Government imposed housing targets are **disproportionate** for a borough with such a high proportion of land being Greenbelt and/or AONB.

Government targets are based off 2014 ONS data not the updated 2016 numbers which are at a lower level.

Roger Gough, leader of Kent County Council, has said about housing plans in Kent: “the consensus is housing has moved ahead of infrastructure. We are talking about roads, we are talking about schools.....we do need to work together to present to government what is required in terms of a balanced approach. People must not feel that housing is coming on such a scale in places that it is not balanced with the infrastructure that comes with it.” (**Courier October 11, 2019**, page 14)

Greenbelt land. The concept of Greenbelt land was established specifically to stop the spread of towns into adjoining countryside so that different towns merged to form larger conurbations. By building the new town in Tudeley, **Policy STR/SS 3**, and expanding Paddock Wood on the Greenbelt land to its west, **Policy STR/SS 1**, the effect will be to create a large conurbation/built up area incorporating Five Oak Green and Tonbridge. Precisely against the intended purpose of Greenbelt land.

TWBC's own study, Green Belt Study Stage Three produced by LUC in November 2020, states that the “garden village” at Tudeley “is large enough to be considered a town”. The report concludes that for both the new town at Tudeley and the land at East Capel near Paddock Wood would have “high

harm” on the greenbelt, with material parts producing the highest negative test of “very high harm” on a scale of seven categories of affect on the greenbelt.

The proposed developments are NOT Proportionate.

- 1 The parish of Capel has around 900 homes. **Policy STR/SS 3** and **Policy STR/SS 1** add nearly 5,000 homes to the parish of Capel. That is absolutely NOT proportionate. Why has the draft local plan chosen to separately account for the homes in the single parish between those in the new town at Tudeley and those west of Paddock Wood? The planning officer has said that it is to “avoid double counting”. Those words of qualification immediately suggest a deceit. To avoid double counting, one could equally as well have said that nearly 5,000 homes are in Capel but, of these, some 2,000 are accounted for in the plans for Paddock Wood. Is this sleight of hand to try and deliberately hide the actual impact on the parish of Capel of the, NOT proportionate, greater than quintupling in the number of homes?
- 2 By another measure the proposed development is NOT proportionate. Over half of the planned housing development for TWBC will be in just one of its twenty council wards.
- 3 Taking a measure of the number of inhabitants shows the development planned is NOT proportionate. There are currently less than 2,500 residents of the parish of Capel. This will grow to around 6 times that number when all these proposed houses are built. A parish with around 2% of the population of TWBC will get over 50% of the planned housing development.

Local needs. What level of diligence has been applied to the work to identify local needs? Not just in numbers of houses, but also in the type of housing? Building a new town at Tudeley is highly likely to generate executive homes which are far more profitable for the developer, than social or affordable housing. Yet the local need is for affordable or social housing.

Has TWBC undertaken its work to identify all the brownfield sites with similar diligence as they have asked landowners to put up greenfield sites for development? Did they initiate visits to potential land owners to encourage the provision of brownfield land, as they did for greenfield categories? **Para 137 NPPF** requires local planning authorities to “examine fully all other options for meeting its identified need for development” before concluding whether exceptional circumstances exist to justify changes to Green Belt boundaries. If TWBC used greater efforts in seeking out landowners for greenfield land than brownfield, the draft plan fails that test.

Enfield is an example showing that the process that councils use to assess brownfield land is often inadequate. The council in Enfield identified a brownfield register for 2,700 homes. Local resident groups identified non-green sites and visited each site to assess its suitability as brownfield. This found space for 37,000 homes.

Housing density. What assumptions have been used by TWBC on housing density in the new town at Tudeley? The destruction of protected Greenbelt land should certainly justify a high level of housing density to reduce the irreversible loss of the valuable natural landscape. Insufficient housing density is a ground for refusal of a Local Plan.

Transport considerations. Para 138 NPPF states that: “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.” It is quite obvious that the new town at Tudeley is not well served by existing public transport. Extra car usage will be generated on roads, many of which are narrow enough not to have a white line lane divider, that are already congested at peak hours. Today the road at the primary school at Five Oak Green is congested at school opening and closing hours. That school has around 200 pupils and the proposed secondary school on an adjacent site will have around 2,000 pupils. What will that mean for the congestion in the future?

Whilst a new road is proposed south of Five Oak Green, this too is in Greenbelt land, resulting in yet more destruction of the protected natural environment. The roundabout at the Colt’s Hill end of Alders Road will encourage ease of access onto the proposed Colt’s Hill bypass, thus driving traffic down Alders Road at peak times rather than along the proposed new road south of Five Oak Green. Additionally, the proposed Colts Hill bypass is in both Greenbelt and AONB land.

What unremovable protections have TWBC put in place that any proposed transport alleviation measures WILL be put in place at the same time as any new developments proceed? There is plenty of evidence that planned undertakings are not enforced once planning has been granted (eg Marden station lift for disabled access).

Sustainability assessment. As per TWBC's own Sustainability Assessment, the housing objective is compatible with only 5 of the 19 sustainability objectives and is incompatible with 9 of them. By TWBC's own standards, this shows a dramatic lack of sustainability and poorly thought through planning.

Hospital capacity and extra needs. A new town and 4,000 new homes in Capel will put great pressure on the services at the Kent & Sussex hospital at Pembury. What work has been done to assess the extra demand and the current capacity of the hospital to cope with this? How can TWBC guarantee the extra resources needed to fund the necessary hospital expansion?

Natural environment. The destruction of greenfield land and Greenbelt land will impact adversely on the natural environment and the wildlife in the area. There is an RSPB nature reserve south of Alders Road less than one mile from the proposed new town in Tudeley. The rise in birds of prey, Buzzards and Sparrow Hawks in particular, that we have witnessed and evidenced within the last few years, will be impacted adversely given the range of land they cover. The agricultural heritage of the parish will be lost for ever.

Flooding and water supply. There is already much known about the issue of flooding in Five Oak Green and other parts of Capel parish. The proximity of the new town to the natural flood plain of the Medway should be properly assessed, including the impact downstream of faster run off. How much increase is there in the likelihood of damaging floods in Yalding, which already suffers regularly in times of heavy rain?

As well as flooding considerations, research should be done on water supply. The whole of the South East is a region of stress for water supply. What professional research has been done on the extra demand from the new town and 4,000 extra homes. Where will the water supply come from? Are there sufficient supplies available?

Air quality, light and noise pollution. The extra housing, cars, street lighting and all that goes with a new town, will lead to increased levels of pollutants in the air and poorer air quality, coupled with noise and light pollution in what is now a rural, Greenbelt area. The quality of the environment in the parish of Capel will be irreparably damaged and changed for the worse; for ever. Is this consistent with a desire for betterment of the parish? It is certainly a total destruction of the existing way of life.

Listed buildings and historic site of Tudeley church. Marc Chagall is a world-renowned artist and only one church in the world has all its windows designed by him; Tudeley church. A key contributor to the ambience of this historic church is its setting in the green fields of Kent. This will be lost when the fields are destroyed and the church is surrounded on three sides by the new town at Tudeley. Has there been a proper assessment on this historic site and the other listed buildings in the parish and its surroundings?

Soil quality. The Greenbelt, agricultural land that will be forever destroyed is of what quality? What proportion of the good quality agricultural land in the TWBC area will be lost? Has there been sufficient consideration of such issues?

Mitigating climate change. There is little evidence that adequate weighting has been given to the topic that is getting widespread coverage now, that of climate change. As the ultimate threat from climate change is negative for every human being, everything that can be done to mitigate the adverse impact from development on climate change should be done. Under government NPPF guidelines, proposed development needs to consider the impact of climate change. In the area of the proposed new town for Tudeley, flood risk is an issue for consideration. As well as the impact of extra carbon emissions in the construction of the new town and the existence of greater population density afterwards. Has sufficient work be done by TWBC on this issue?

Regulation 18 responses ignored. There were over 1,000 comments objecting to the draft local plan at Regulation 18. How many changes to the draft local plan were made in direct response to these specific objections to the new town at Tudeley? The supposed consultation with the local community is a sham; a process of consultation in name only to get round the legal need to "consult", with no account being taken of the significant body of objections or any action being taken to revisit the plan for a new town and development concentrated in just one area of the borough.

CONCLUSION FOLLOWS ON NEXT PAGE

CONCLUSION

In conclusion, I contend that this draft Local Plan and the concept of the new town to be built on Greenbelt land in Capel, has been poorly thought through, is a 'convenient' solution to meeting government imposed targets rather than addressing local needs and provides no "exceptional circumstances" to justify the destruction of Greenbelt land and riding roughshod over the long established precedents to protect the Greenbelt.

Any consideration of this ill-thought through plan should take account of the fact that it comes from a council that proposed running up significant debt to finance a hugely costly theatre, a reckless proposal that was palpably not wanted by the people of the borough.

The draft local plan is **NOT "Sound"**. It is **NOT justified** and has **fundamental inconsistencies with national policy**, thus it is **NOT effective**.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Removing from the draft local plan the proposed new town at Tudeley would be a start.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Sustainability assessment.

As per TWBC's own Sustainability Assessment, the housing objective is compatible with only 5 of the 19 sustainability objectives and is incompatible with 9 of them. By TWBC's own standards, this shows a dramatic lack of sustainability and poorly thought through planning.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Susan Pickett [REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Susan Pickett [REDACTED]
Comment ID	PSLP_470
Response Date	24/05/21 15:54
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.5

Data inputter to enter their initials here KH

Question 1

Respondent's Name and/or Organisation Mrs Susan Pickett

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/CA 1 The Strategy for Capel parish

Policy STR/SS3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR/CA1 and STR/SS3 – see Comment Numbers PSLP_444 and PSLP_470]

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not justified

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

5.262 The land proposed for 'Tudeley Village' is within green belt and is also partly High Weald AONB. This proposal has not been thought through. So many additional houses would burden this countryside area. And although situated in Tunbridge Wells Borough Council, it is blatantly obvious that Tonbridge would bear the brunt of a larger population which it is not able to bear, IE doctors, dentists, schools etc Tonbridge rail station is nearer, also, than Tunbridge Wells. more cars for less parking availability. This development would alter irreparably the very important rural setting that it now enjoys. Think again please! The proposed site will encircle all Sainsts Church, Tudeley which has stood on its foundations for centuries. People coming and visiting this unique church with its rare chagall windows will not have a view over the Medway River valley to the North Downs which is currently available. Who wants to look at modern housing when out for the day?

also what about noise and light pollution? We are supposed to be reducing these things - not adding to them. To many cars and traffic on lanes and roads too small to take them. There is no infrastructure to accommodate this increase in population.

Flooding Over the past few years, flooding has been a problem that has increased. Concreting over vast areas of land which helps take water away will inevitably mean more 'run off'. Concrete is not absorbant. It is a known fact our climate is changing. We have far more rain now and for longer periods. Flooding is an ever increasing problem.

Nature What of the animal, insect and bird life which will be detrimentally affected by this development? Years of building works (and it will take years) can only do more harm than good. Please take into account the natural environment which will be irretrievably damaged should this development go ahead.

Question 6

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This proposed development is not acceptable. It is thoroughly ill-conceived and not thought through as I have previously stated. Ore land owner is beneficial to the Council but not to the environment.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Norman Pickett [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Norman Pickett [REDACTED]
Comment ID	PSLP_430
Response Date	26/05/21 11:50
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Other
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr Norman Pickett
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Nos. 5.199 to 5.229

Inset Maps 33 & 34

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

5.199 to 5.229 The whole of this proposal is objected to. It is misconceived; it is a massive development in the wrong place. It is dissected by a railway (5.204) - entirely inappropriate for a new settlement with no station, a school and other facilities.

All Saints Church (5.206) would be swamped by the development, and the extensive views to the north would be destroyed forever.

5.207 - Flooding The land proposed to be developed lies within Flood Zones 1 and 2. new run-off will only worsen the situation.

Please see the above comments for paragraphs 5.262 to 5.266 which have a direct bearing on the whole of the "Tudeley Village" proposal. [TWBC: for response to paragraphs 5.262 to 5.266 see PSLP_425].

Infrastructure should come first in any proposal of this magnitude.

Looking at the map on p.164, I cannot see an explanation for the large purple circles on Tudeley Road (3 in all) nor the smaller ones on the railway line (4 in all). What do they signify? They cannot be the "Junction improvements" as on the map legend, as they aren't at junctions. Please clarify. Maps 33 & 34 are relevant to this question.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are no modifications which would make these proposals acceptable. The development proposed is in the wrong place for the reasons I have set out. It is ill-conceived in its entirety.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Helen Adam [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Helen Adam [REDACTED]
Comment ID	PSLP_1007
Response Date	02/06/21 23:22
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Postern Lane Residents' Association (PLRA)
Question 2	
Agent's Name and Organisation (if applicable)	Helen Adam (on behalf of PLRA)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3 - Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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The Postern Lane Residents' Association (PLRA) is an unincorporated association of 33 households on Postern Lane (a private road between Tonbridge and Tudeley). These comments are on behalf of the lane residents.

The PLRA objects to Policy STR/SS3 for the reasons summarised below.

SUSTAINABILITY

The new town has been proposed in a wholly unsustainable rural location. Residents of this new settlement would regularly travel to Tonbridge and Paddock Wood, the two local centres. How would they do so?

The obvious answer is that most of them will go by car, because (a) all the evidence shows that that is what people do unless there is a very attractive and convenient public transport alternative, and (b) the new settlement will not have any serious public transport at all. There is no train station and there is no evidence that one ever would be agreed by Network Rail. The "four bus an hour" service vaguely floated by TWBC will never attract enough market share to reduce car usage to the necessary levels (and is not financially viable, and no doubt would be quietly withdrawn as loss-making after a few years). Nor will sufficient numbers of people cycle or walk: the distances are too great and the inconvenience too high (eg for school runs, for larger shopping trips, for the elderly or even when it is raining).

So what will happen when the residents of this new settlement turn to their cars, as they inevitably will? TWBC's own evidence shows that the answer is gridlock. Tudeley's major road connection is a B road (the B2017) which is already overloaded. Many of our residents do not exit the southern end of Postern Lane onto the B2017 in the morning rush hour as it is already a traffic jam, and that is before a single new house has been built.

Without a major road building programme (which TWBC acknowledges would be economically and environmentally unacceptable) the traffic which the new settlement would generate would overwhelm the local infrastructure.

The new settlement would thus be wholly car-dependent in an area with poor road connections. This is not sustainable planning.

What is more, TWBC is seeking to meet around 25% of the housing proposed by the Plan through this one single site. With such a complex project complications and delays are almost inevitable, and because of the heavy reliance on the Tudeley site to deliver, that will mean that the predicted housing need will not be met.

AGRICULTURAL LAND

The new settlement is mostly on Grade 2 agricultural land (See TWBC Development Constraints Study October 2016, Figure 5) and Grade 2 land is rare in the Borough (See TWBC Agricultural Land Classification Study 2014). The NPPF states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”* (see NPPF para 170(b); “best and most versatile agricultural land” includes Grade 2 - see Glossary, p65). NPPF footnote 53 adds that *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”*. There is no evidence that TWBC has considered seeking out poorer quality land and it is obvious that building on 180ha of prime agricultural land will not contribute to or enhance the natural and local environment.

GREEN BELT

TWBC could only lawfully remove this very large amount of land (182ha) from the Green Belt if it could positively show that “exceptional circumstances” exist justifying this course of action: NPPF para 137. It cannot begin to do so.

NPPF para 143 protects the Green Belt from inappropriate development and paragraph 144 requires substantial weight to be given in planning decisions to “any harm to the Green Belt”. TWBC’s own assessment of harm, in 2016/7, stated that removal of Green Belt land in this location would cause “Very High” harm to the Green Belt: see Table 6.1 of *Tunbridge Wells Green Belt Study, Stage Two Final Report* prepared for TWBC by Land Use Consultants Limited July 2017.

That, of course, was before TWBC had decided that it could solve all its housing problems by dumping them into this giant housing estate. After that decision, TWBC’s consultants miraculously decided that the harm to the Green Belt could after all be downgraded to “High” (Green Belt Study Stage 3, LUC, issued Nov 2020, Rev 1 (corrected) March 2021). It is impossible to avoid the suspicion that this conclusion was reached because it was the desired answer, rather than the right one. It is obviously wrong and the methodology used to reach it is obviously unsound. The short point is that this new settlement goes right up to the edge of Five Oak Green and in effect will create a giant new “super-settlement” running from Hartlake Road in the west through to the eastern edge of Five Oak Green. It will thus occupy the bulk of the 6km gap between Tonbridge and Paddock Wood and in doing so will actively contribute to neighbouring settlements merging.

TWBC has not even bothered to undertake a Landscape and Visual Impact Assessment, which is an extraordinary omission. The site is virgin Green Belt land of the highest landscape quality, very vulnerable to development. No vague talk of “improvements” elsewhere could compensate for its loss (and to seek to justify the destruction of prime Green Belt land by improving other land, necessarily of lower quality, is a bizarre strategy in any event).

AONB

Creation of a substantial new settlement on the very edge of the AONB will create both indirect harm to the AONB (by damaging its setting) and also direct harm (by adversely affecting its tranquillity and by creating light pollution over its dark skies).

CONCLUSION

Policy STR/SS3 is unsustainable and inconsistent with national policy; it is not sound.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is hard to provide a modification to the local plan when it is so fundamentally flawed. We suggest a removal of STR/SS3 (The Strategy for Tudeley Village), from the local plan and instead we invite TWBC to plan a number of smaller developments, spread around the Borough, and adjacent to existing communities.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The Sustainability Appraisal is fundamentally flawed and has not accurately nor sufficiently assessed the likely environmental effects, nor the social or economic effects, of the Local Plan. They have worked with one landowner for convenience but this does not amount in itself to a sustainable strategy. TWBC have failed to consider reasonable alternatives.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	John Potter & Jan Roberts [REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	John Potter & Jan Roberts [REDACTED]
Comment ID	PSLP_1121
Response Date	03/06/21 11:50
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB

Question 1

Respondent's Name and/or Organisation	John Potter & Jan Roberts
---------------------------------------	---------------------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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We are John Potter and Jan Roberts

xxxx

TONBRIDGE

TNxx xxx

Home tel: xxxx

[TWBC: full address and phone number redacted for data protection purposes]

We have already written to you concerning the effect of the proposed local plan by TWBC.

This letter is to reiterate our, and we believe many others, horror, at the ill-thought out intention to “grow” Tunbridge Wells beyond what you can actually cope with. For so many years the major site opposite the Council Offices has been left undeveloped. And there are probably more than enough other “brown field” sites in your town that can be used for housing etc. Ones that you should be concentrating on instead of scarring the beautiful Kentish landscape.

Your plan to build across from the old people’s accommodation near Woodgate Way was abhorrent and we understand that mercifully you have had the grace to drop this thoughtless idea.

You are aware that Tonbridge has a large number of schools within the town and that pupils are brought in from far and wide. Regularly the town is gridlocked with pupils and the resulting increased traffic. Any new housing developments in the area which will contribute to this situation will, of course, result in extra congestion.

Lastly, and most important, green fields sites are environmentally SO important to everyone’s well being and need to be preserved and not be available to those building developers who are happy to grease the palms of whoever will give them carte blanc to destroy them.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Alan Powell [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Alan Powell [REDACTED]
Comment ID	PSLP_1646
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Alan Powell
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I live on the Somerhill Green development, off the A26 (Woodgate Way) and I am writing to strongly object to your Strategy for development in Tudeley and Capel Parish.

Creating a garden settlement of so many residential dwellings at Tudeley will cause immense harm not only to the existing residents of the Parish of Capel but also to the residents of Tonbridge and in particular residents of Somerhill Green. There will be a significant increase in traffic into Tonbridge from the B2017 (Tudeley Road). This road is already heavily congested, particular in the mornings and late afternoons. This makes it very difficult to leave the Somerhill Green site onto the A26 via the roundabout. This is the only vehicle access into and out of Somerhill Green residential development and The Bishops Chavasse primary school. The A26/B2017 roundabout on Woodgate Way is difficult for traffic to enter due to its layout. There is a blind spot when leaving the residential/primary school developments and you cannot see traffic coming from the Vauxhall roundabout until the last minute. The construction of all these new dwellings in this area is a recipe for disaster, with the increased volume of traffic causing not only gridlock, but a vast increase in pollution.

Many of the people living in the new houses will use Tonbridge Railway Station for commuting, where will they park ?. The additional traffic will be more than the roads can cope with. The towns roads are already full at peak times, the trains are already packed. With all the new houses at Tudeley and at East Capel it could mean a very large increase in the number of additional cars on the narrow lanes. I don't believe this proposal is sustainable. There will also be a big impact on health services and other amenities in the Tonbridge area.

Concreting over farmed fields will have a large impact on flood risk. Much of the Medway floodplain will be lost. I believe that flood risks will increase. The developments will make the Medway more likely to flood more often and cause increased flood risks in the whole area of Tonbridge to Yalding.

Creating such a large development and destroying so much Green Belt land will kill wildlife and ruin the habitat for many others, with increased noise and light pollution. We should be protecting our woodland, hedgerows and the environment. Future generations will not thank you for vandalising the countryside.

I would ask you to please think very carefully before adopting this environmental unfriendly plan. Destroying acres of pristine Green Belt land, teeming with wildlife and rich in biodiversity is not in keeping with todays thoughts for reducing climate change and helping to protect our planet for the children of the future. There must be a better way forward, what about utilising all the empty property in the borough and brown field land left vacant ?.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

**If responder hasn't ticked an option on this box,
data inputter to tick 'not stated' box.** Not Stated

Comment

Consultee	Michael Purton ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Michael Purton ([REDACTED])
Comment ID	PSLP_1304
Response Date	04/06/21 15:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Michael Purton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 Strategy for Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I work as a freelance classical recording producer and have an editing studio in my garden at home. My wife and I moved to Five Oak Green from central Tunbridge Wells in 2013 (we moved to Tunbridge Wells in 1993) seeking relative peace and tranquility. This tranquility has been gradually eroded.

During our 28 years in the Borough, we have seen house prices go beyond the reach of our children and indeed most local people not on high incomes.

We have also seen an exponential increase in traffic over the years, including during our time at Five Oak Green, indeed the current amount of traffic through Five Oak Green is far heavier than is safe for our roads. The B2017 through Five Oak Green is used as a rat run and there is an unacceptably high number of HGVs already using this route. The stretch near Capel School is very dangerous, especially at the beginning and end of the school day. Speeding is frequent.

The stretch of the B2017 near Tonbridge is frequently jammed morning and evening and there are often long tailbacks. The proposed development would increase traffic hugely and unfortunately the development is not within easy walking distance of a railway station, of shops or of other facilities. Residents will be compelled to use cars to travel locally. I understand there is no possibility of a railway station in the proposed development.

I am aware from my GP in Paddock Wood that it will be nigh impossible to establish and more importantly staff a health centre in the proposed development at 'Tudeley Village'.

The proposed development at Tudeley Village is adjacent to a large area of land which is at risk of flooding, from streams, rivers and reservoirs, which is compounded by a frequent inability for the land to absorb rainwater, which often results in surface flooding, which we have experienced at our own house. Building close to this area that is prone to flooding and concreting over a large area of ground will increase severely the risk of additional flooding in Five Oak Green.

The policy of the Green Belt aims to check urban sprawl and ensure that neighbouring towns do not merge. This proposal does not comply with this aim, there is a real danger of an urban sprawl joining Tonbridge, Five Oak green and Paddock Wood.

Another aim is to safeguard the countryside from encroachment and to preserve the setting and special character of local communities. This proposal fails to safeguard and preserve our local communities.

Access to open countryside will be reduced, attractive landscapes will be lost forever, Nature conservation interests will be severely damaged and precious agricultural land will be lost forever.

The B2017 borders the High Weald AONB. The considerable increase in traffic and ensuing noise will further impact the peaceful character of this AONB.

TWBC has failed to engage with the public response to Reg. 18, we do not consider that the Council has invested appropriately in its own Town Centre and in providing affordable houses. Building this development at Tudeley will impact severely on the residents of Tonbridge. Indeed I am aware that a number of Tonbridge and Malling Councillors have already written to TWBC expressing deep concern about the major negative impact of the proposed development on their Borough and the fact that it does not reflect the Statement of Common Ground between the two Boroughs.

Finally, I believe that the proposed development is purely speculative and has nothing to do with the wellbeing and needs of residents of this part or indeed any part of the Borough. It appears that with the land offered up by the Hadlow Estate, TWBC have found an easy way to fulfil their perceived new housing obligations and to make a great deal of profit for the Hadlow Estate by creating an ineffective and inappropriate development that would destroy forever an area of Green Belt and indeed the wonderful local community that is Five Oak Green.

Michael Purton B Mus M Mus

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Future Notifications

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Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_137

Comment

Consultee	Mr Alan Chilvers ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Residents of Golden Green Association & KeepKent.Green
Address	[REDACTED] [REDACTED] Tonbridge, Kent TN11 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Residents of Golden Green Association & KeepKent.Green (Mr Alan Chilvers - [REDACTED])
Comment ID	PSLP_2028
Response Date	04/06/21 11:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	PSLP_2026-2031, 2033, 2037-2040 KeepKent.Green & Residents of Golden Green Association Representation
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Golden Green Residents Association & KeepKent.Green
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

[TWBC: for further comments by KeepKent.Green and the Golden Green Residents Association, please see Comment Numbers PSLP_2026-2031, PSLP_2033 and PSLP_2037-2040]

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified
	. It is not consistent with national policy

Question 5

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[TWBC: the following extracts are from the representation submitted by KeepKent.Green and the Golden Green Residents Association - for the full representation, please see supporting documents]

KKG Objects to Policies STR/SS1 and STR/ SS3 as well as providing additional commentary on other policies, that lead to conclude the Local Draft Plan is not legally compliant, is not positively prepared, is not justified or effective or consistent with NPPF.

Key constraints in developing the Tudeley Garden Village Site (STR/SS 3)

- . **Isolated Site** with Limited Transport Connectivity
- . **No Sustainable Transport Provision.** The assumed transport modes are unrealistic and new home owners will continue to rely on their own motor vehicles
- . **Unacceptable risk to highway safety**
- . **Access to A26 and A228** and many surrounding local country lanes are already constrained
- . **Capacity Issues** on existing highway network
- . **Significant hazards** and constraints to the safe movement of pedestrians
- . **Major Traffic Impacts** that can not be mitigated
- . **Removal of Green Belt-** TWBC do not intend to replace any Green Belt,
- . ANOB Boundary is a boundary of convenience, as the boundary is defined by a road B2017. 75% of Green Belt that surrounds London is productive agricultural land - Garden of England Should not become another concrete patio
- . **81% of the proposed removal of Green Belt** within the borough will be from the Parish of Capel
- . **Where is the special circumstances evidence** as defined in NPPF to remove Green Belt restrictions

- . **Noise** from local roads and the railway
- . **First Phase of the village** approx 450 houses to be constructed before any infrastructure allocation.
- . **Current infrastructure** provisions are already at capacity or exceeding capacity
- . **Nearest railway station** to the site is Tonbridge located approximately 4 miles from the centre of Tudeley village.
- . There is currently no convenient safe walking route to the train station from the site
- . **Future transport considerations** rely heavily on development of new road networks as well as major upgrades of existing highways, but will be reliant on existing rural country lane networks which are already constrained ,not fit for purpose to accommodate additional larger vehicle traffic capacity, these lanes will become school and commuter alternative routes which will cause significant traffic safety hazards .
- . **Part of the proposed site is safeguarded** by KCC within Kent County Council Kent Minerals and Waste Local Plan 2013-2030, with proposals to extract up to 3.5mIn tonnes of sand and gravel within the immediate area.
- . **The site** is visible from a number of viewpoints with key views both internally and externally. There is a limited level of enclosure via trees or topography with numerous visual receptors, thus overall visual impact will be seen by many people either in dwellings or passing through the site.
- . **Marketing and housing sales** could be severely hampered with the proposed quarrying as these quarries will be visible from the proposed Tudeley Village site.
- . **Further quarrying** will bring sustainability issues to the area, with intensive diesel operated plant machinery, quarry vehicles accessing the site (existing quarry already has permission for up to 88 HGV movements per day; this will increase substantially over time as the other quarry sites come on line.)
- . **Substantial increase in Carbon footprint** from the quarries and construction workings and partial removal of natural floodplain.
- . **Air Quality-** No air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development”. While air quality is only one of many considerations that are relevant to planning, the NPPG states that where sustained compliance with EU Limit Values is prevented, a local authority is to “consider whether planning permission should be refused”.With such significant cumulative developments within the Parish of Capel air quality will become a issue. No evidence of engagement, no emission mitigation assessment or cost calculation as specified in its air quality policies, Limited data, mitigation regarding the potential deterioration in local air quality and potential adverse impacts on nearby sensitive receptors.
- . **KCC Minerals and Waste Local Plan 2013-2030** have safeguarded adjoining land at Stonecastle Farm Quarry extension and Moat Farm Five Oak Green, existing Rail Head and land at J Clubb at East Peckham, a number of management criteria have been identified within the MWLP outlining measures that will be required to be put in place to examine the potential effects from these extraction developments such as amenity,transport, water, visual impacts,noise, dust, habitat and ecology.
- . **There is no evidence** as requested by KCC that consideration should be given to masterplanning and phasing of the proposed development to manage these potential effects especially in relation to noise or visual impacts to new and existing residential receptors on the site.
- . **High level of ecological constraints** have been identified within the area, this evidence has been produced from recent planning permission application from the neighbouring quarry (see TM/00/1599/R26C1 and TW/19/1343/R29 at <https://twbcpa.midkent.gov.uk>. Note comments from RSPB, Hadlow Parish Council, keepkent.green and local residents comments).
- . **Biodiversity-** requires conservation and enhancement - Rare and endangered species are present within the Capel sites, including Great Crested Newts , Dormice, Bats, Badgers, Water Voles, Owls, Otters, Peregrine Falcon, Red Kite, Buzzards. Rare botanical Plant life is also recorded within the sites including Shepperds Needle.
- . **Climate Change-** Serious problem with far reaching consequences. Partial removal of one of UK’s largest natural floodplains, Removal of Green Belt and productive agricultural land, further mineral extractions, major infrastructure and highways issues, the combined cumulative effect and increased carbon footprint will be significant.
- . **Ticketless walk-on commuter** bus services with their own dedicated bus lanes are not feasible within Tonbridge Town centre due to infrastructure constraints and existing buildings will only increase the already congested town centre. Long term financial viability after developer financing ends.

- . **The MasterPlan and SA** clearly states to accommodate this development, off site infrastructure improvements Will BE Required but this has now been changed to “There is a desire to provide”.
- . **Network South East** have ruled out any possibility of a designated Railway station (Tudeley Halt Station) due to many constraints to the existing line, as well as the financial /economic viability.
- . **Railway Line** No Noise offset has been applied to the proposed village at Tudeley
- . **The wider transport context** plan relies on the Development of Tudeley Village as well as assumes that neighbouring LPA's agree to connectivity linking infrastructure that will benefit the respective LPA's boroughs. As this development borders other LPAs and will have significant infrastructure impact and pressures on other neighbouring Boroughs.
- . **No specific technical reports** or assessments have been provided in relation to air quality, noise, waste,sustainability or energy.
- . **Significant Noise and Vibration** through the site , as housing development is proposed either side of the railway line no detailed mitigation has been provided within the LP
- . **Loss of Productive Agricultural Land**, Orchards and soft fruit will have a potential impact on the local economy - policy EN20 .
- . **Aquifers** The presence of the total catchment of a Groundwater Source Protection Zone north of the railway line also creates a risk that must be carefully managed, any development would put additional strain on existing resources, without further consultation with EA & Water and Railway Companies will lead to increased flooding issues .

Southern Water - Water Quality- TWBC High usage- Water resources are already stressed

- . **The Hartlake catchment** is at risk from pesticides and also nitrate. Hartlake source abstracts water from the River Terrace Gravel aquifer and due to its location it is connected with the River Medway. There is a significant relationship between groundwater levels in the River Terrace Gravels at the Hartlake site and River Medway levels and flows. These aquifers must be safeguarded and protected from penetration to avoid pollution. (No policy or protection mechanism).
- . **Floodplain meadows** have the potential to provide flood-storage areas, support rare plant communities, store carbon and provide a valuable hay crop. Importantly, they also have the potential to trap sediments as the river spills across the meadows. Partial removal will eliminate the above
- . **Flooding often occurs** at the site and surrounding area has a long history of flooding both fluvial and surface water, in 2000 & 2013 parts of this area were evacuated by emergency services, Hartlake Road is regularly closed during winter months for weeks, B2017 Tudeley Road, Sherenden Road are also a regular flood hot spots.
- . **Given the topography** of the terrain 60 AoD to 20m AOD the development would result in substantial amounts of run-off that will descend towards the railway and eastwards across the Sherenden Road area.
- . **Sewerage** a drainage plan has not been identified within the evidence base, although it is clear that extensive mitigation will be required, surface water attenuation storage and other forms of SuDS will impact the developable area and the cost.
- . **Brownfield Land/Sites** TWBC has not considered exhaustively the availability of Brownfield sites within the borough and ignored potential sites for strategic development in areas outside MGB and ANOB.
- . **Landscape** Makes a strong contribution to local landscape character,any large scale development is likely to have considerable consequences with extreme harmful cumulative effects on what is at present open countryside within Metropolitan Green Belt.
- . **Landscape Character Assessment** has not been conducted as defined in NPPF, and requires enhancement and protection.
- . **Transport** the sheer scale and size of these development proposals will have a significant impact on the current transport infrastructure system with 1,000's of new vehicles accessing Tonbridge and Paddock Wood on a daily basis.
- . **Heritage**, there are a number of heritage assets of strong community importance within close proximity, the area is surrounded by abundance of listed buildings, distinctive Oast Houses/Kilns and historic farmsteads , 2nd World War Pill Boxes which will have their settings and residential amenity severely compromised.
- . **A Public Charette Consultation** -By Invitation only conducted in Tunbridge Wells, not in Capel Parish - Only 145 attended- Clearly restricting local community to attend and have their say,

discriminating against older members of the community without Internet access and lacking the necessary IT skills to have their input, as well as people without access to a motor vehicle.

- . **Restricted public input** into the Charrette consultation only selected members of the community and stakeholders were invited to provide any input.
- . **Infrastructure & Viability Plans** not released publicly until Reg 19 consultation
- . **Not a fit and proper public consultation**
- . **Policies within plan** support site allocation but relying on limited information from the landowner and the Hadlow Estates Tudeley Delivery Strategy.
- . **Considering Tudeley** is the largest development project within the history of Capel it is very concerning that the borough council is reliant on third party evidence.
- . **TWBC has added** an additional 1,000 houses allocation buffer above the specified government housing guidelines.
- . **Urban Sprawl-** The PSLP demonstrates Urban Sprawl as the proposed 2,800 homes STR/SS 3, Tudeley will not be situated close to any substantive development initially, but over time will manifestly change the character of the site as well as the wider surrounding area from underdeveloped rurality to an urban dominated environment, with only a small gaps to the west connecting with Tonbridge Town and Five Oak Green and Paddock Wood to the east, this will introduce what is effectively an urban corridor between Tonbridge and Paddock Wood.
- . **Heritage-** Cultural Heritage and archeology requires protection and enhancement- Listed Buildings- Tudeley Church, Hadlow Tower, Hadlow Agricultural College, Somerhill
- . **Cumulative Impact-** Negative Cumulative Impact on historic landscape character effectively suburbanising the surrounding countryside.
- . **The NPPF clearly states** in paras 133 to 147 that Green Belt should only be released in exceptional circumstances, but there are no exceptional circumstances that have been articulated.
- . **A report in 2018** by the London Green Belt Council stated:" that contrary to claims by developers, building in the Green Belt does virtually nothing to address the crisis of affordability of housing, especially for young people, in the South East.
- . **Lack of detail / Clarity** within the Infrastructure Plan/ Hadlow Estates Delivery Strategy
- . **Infrastructure and Viability Reports** This data was distributed 4 weeks prior to public distribution to TWBC Councilors via a confidential password protected internal delivery system. At least 12 councilors who voted in support of the PSLP at the Full Committee Meeting had not accessed/ examined these important documents via the data room.
- . **Key local economic issues-** Potential loss of existing local businesses, Moat Farm, Scripps , Bank Farm Stables, existing small local shops and businesses.
- . **TWBC Carbon & Energy Targets-** Building a large number of new homes is likely to increase carbon and energy demands, in addition public transport is not always convenient so private car usage will increase substantially.
- . **SA Appraisal Alternative sites -** Horsmonden- Rejected - Landscape sensitivity would require further consideration because the site is outside (but adjacent to) ANOB. However the site was considered to have access difficulties that would render this alternative unviable and this not a reasonable alternative to garden village principles. Site not within Green Belt, accessible to Paddock Wood, No Flooding Issues.

Tudeley closing access at Hartlake Bridge hampering access for Golden Green residents, new roundabout on B2017 on a hill, many road and access issues at Tudeley.

The site is entirely Green Belt and the most recent Green Belt Study concludes the overall harm rating of releasing this land from the Green Belt is **high**.

- . **Kippings Cross sites** within ANOB and landscape impacts were considered too severe to warrant consideration as a reasonable alternative, although this site was championed by TWBC as their preferred site until 2017 when the landowner submitted Tudeley and East Capel sites. It is well known that TWBC expected Kippings Cross to be brought forward but last minute negotiations between the promoters collapsed.
- . **Langton Green-** Landscape Impacts and ANOB- Biodiversity and Nature Conservation designations are scattered across the borough, but are not common in ANOB, this greater development in ANOB could create increased pressure on wildlife. TWBC do not consider increased pressure on wildlife at Tudeley.
- . **Policy STR/SS 3 :** This policy mentions that the standalone garden settlement (Tudeley Village) will be developed using a comprehensive master plan, there is no evidence of this comprehensive master plan, only the Hadlow Estates Delivery Strategy, which lacks detail and at best is very

vague and already outdated, as such detail as the school provision has been relocated and the Tudeley Hale Railway Station is still indicated of which we understand the station allocation has been ruled out by Network South East on economic viability and major distribution to the existing network.

- . **This unusual adoption by TWBC** to jointly lead the master planning approach, permitting the landowner to be 100% responsible for all the output of this delivery plan especially as this is one of the largest projects within its history, the landowner has no development experience and as highlighted by many property commentators within Reg 18 consultation this is not a comprehensive Master Plan.
- . **Consultation Statement** of Draft Local Plan - Question 1 Do you agree with the new draft vision for the borough? Summary of responses-
244 responses were received to this question.
154 Respondents (about 63%) DISAGREED with the Draft Version
75 Respondents (about 31%) Agreed
15 respondents (about 6%) did not indicate
- . Overall the majority of 67% Disagreed with the vision, while only 33%Agreed.
- . 95% of the comments submitted within Reg18 regarding Tudeley were against the Garden Village Development.

- . **Dark Skies** - CPRE Report, Tudeley currently is a dark skies area with close to zero light pollution, new development will produce severe light pollution not just within the development but many of the surrounding villages and beyond. Strong adverse impact on the whole of the Medway Valley.
- . **The overall cumulative impact** of questionable delivery of vital infrastructure, major transport issues, removal of large parcels of MBG and productive agricultural land, no detailed landscape assessment, building houses on a natural floodplain that has a long history of flooding, catastrophic consequences for the local ecology are all the ingredients to deliver an environmental disaster.

Conclusion

The PSLP has demonstrated there continues to be extensive issues and concerns, especially regarding the 2 strategic sites of STR/SS 1 Paddock Wood and East Capel and STR/SS 3 Tudeley Garden Village.

Many Issues and questions raised within Reg 18 from the wider community, local residents and neighbouring LPA's continue to be unanswered, it lacks critical evidence.

The overall impact of the TWBC Local plan by allocating over 50% of its total housing requirements, so close to its boundary with TMBC , highlights TWBC has not considered the substantial liabilities it will impose on Tonbridge Town, Maidstone,Paddock Wood, Capel and surrounding villages within TMBC.

With other neighbouring LPA's who are also at various stages of their own local plans, TWBC PSLP should be delayed or withdrawn until further engagement is achieved and agreed policies and strategies are established. To continue with the current strategic sites strategy will condemn these towns and villages to an environmental disaster.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

KeepKent.green would like to attend and participate in any Inspectors Hearing regarding the TWBC Local Plan.

If you would like to attach a file in support of your comments, please upload it here.

PSLP 2026-2031, 2033, 2037-2040 KeepKent.Green & Residents of Golden Green Association Representation

Comment

Consultee	Andrew Richards ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Andrew Richards ([REDACTED])
Comment ID	PSLP_2102
Response Date	03/06/21 21:42
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4

Data inputter to enter their initials here KH

Question 1

Respondent's Name and/or Organisation Mr Andrew Richards

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 9 Green Belt

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR 9, STR/SS 1 and STR/SS3 – see Comment Numbers PSLP_2096, PSLP_2101 and PSLP_2102]

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Green Belt

- 1 The Pre-submission Local Plan (PSLP) proposes to remove over 330ha of land from the Green Belt to satisfy the Tudeley and Paddock Wood garden settlements (PSLP table 6). However, this use of Green Belt land runs counter to the NPPF and more recent clarifications provided by Government. Specifically:
 - a. The Government first set out its position in 2014 when posing the question “*Do local planning authorities have to meet in full housing needs identified in needs assessments?*” (see web link). The answer provided was as follows:
 - (1) *Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.*
 - (2) *However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.* (my emphasis)
 - b. This was amplified in 2016 when the Minister for Housing and Planning stated:

“*The Government are committed to the strong protection and enhancement of green-belt land. Within the green belt, most new building is inappropriate and should be refused planning permission except in very special circumstances*”. (Hansard, 18 Jul 16)
 - c. This is reinforced by the NPPF para 11b which states:

“*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*

 - (1) *the application of policies in this Framework that protect areas or assets of particular importance [footnote refers to Green Belt] provides a strong reason for restricting the overall scale, type or distribution of development in the plan area, or*

(2) 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”.

d. This is further supported by the NPPF para 145: “A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt”, with a list of exceptions, none of which apply to proposals of the magnitude proposed for Tudeley or Paddock Wood.

e. The Government has recently (April 2021) clarified its position on the use of Green Belt. (see web link). Specifically:

(1) “We heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”

(2) “Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.”.

f. This is reinforced by other guidance, for instance

see web link:

(1) Should plan-makers override constraints, such as Green Belt, when carrying out the assessment to meet identified needs?

“Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).” (Paragraph: 002 Reference ID: 3-002-20190722)

g. The above policy and guidance is summarised concisely in the following terms (see web link):

“The government's policy position is broadly that the green belt be protected almost at all costs, but consequently that development needs (in particular for new housing) will have to be accommodated in sustainable locations in other areas (including open countryside) outside the specific designations where planning policy imposes specific constraints”

1 It is worth noting, consistent with the above guidance, that TWBC rejected a planning application ref 18/01767 from the Poacher pub on Hartlake Road (immediately adjacent to the proposed garden settlement at Tudeley) on the grounds it would intrude on Green Belt, noting as a reason for the refusal:

a. “The proposal would constitute inappropriate development within the Metropolitan Green Belt, which by definition is harmful to its openness. There is insufficient evidence of the necessary ‘very special circumstances’ to overcome this harm. The proposal is thus contrary to . . . and the National Planning Policy Framework 2018” (rejection letter dated 31 Jul 18)

3.. Supporting documents to the PSLP recognise the harm that would be caused to the Green Belt by the two proposed settlements at Tudeley and Paddock Wood. Specifically,

a. The Development Strategy Topic Paper identifies that there would be a ‘high’ level of harm to the Green Belt from the two settlements, which would remove more than 330ha from Green Belt (see web link) – table 4

b. The Stage 3 Green Belt Study identifies the risk of the Tudeley and Paddock Wood settlements merging into each other when it states ((see web link):

(1) “The fundamental purpose of the Metropolitan Green Belt is to prevent the sprawl of London and, as part of that, preventing other settlements growing towards London. Therefore, it makes sense to prevent Tunbridge Wells, Paddock Wood and Tonbridge from merging into one another” (para 5.32).

(2) "To the east, the release of AL/CA1 along with the expanded Paddock Wood (AL/PW1) will create a gap of approximately 1.8km between Tudeley Village and Paddock Wood. However, existing intervening urban development at Five Oak Green, washed over development on Badsell Road, rail and road connections, and a lack of significant separating features will reduce the perceived gap. This will, without mitigation, weaken the strength of separation between the inset edge of Tudeley Village and existing inset development at Five Oak Green, although will still provide a level of distinction between the two settlements" (para 4.114).

4. The NPPF (para 137) requires LPA's to engage with others through statements of common ground to address any remaining unmet need before any encroachment on Green Belt:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

However, there is limited evidence of TWBC having engaged with other LPAs to address any unmet need that would arise from removal of the Tudeley and Paddock Wood proposals. For instance, there is no agreed Statement of Common Ground between TWBC and TMBC. Similarly, the engagement record between TWBC and TMBC shows only limited discussion of unmet needs and what seems to be a belated realisation by TWBC that it needed assistance (Duty to Cooperate Statement, Appendix C5 -

see web link)

- . 14 Dec 18 meeting stated "TWBC indicated could meet their own OAN"
- . 18 May 20 "discussion about unmet need"
- . 6 Oct 20 "TWBC formal request to TMBC to meet unmet TWBC housing/employment need"
- . 14 Oct 20: "TMBC response"

I am therefore of the view that TWBC has failed to meet its duty under the NPPF to engage meaningfully with neighbouring LPAs to seek their assistance to meet the TWBC identified need for development (see also separate representation on the wider failure to meet the Duty to Cooperate).

5. The Development Strategy Topic Paper adopts a circular argument when it states (para 6.200) "The assessments undertaken to determine the most appropriate locations for a garden settlement were unable to identify sufficient suitable and deliverable land in areas wholly outside of the Green Belt". This presumes a need to establish a garden settlement, whereas other options (such as urban infill) have not been fully explored.

6. I therefore conclude that TWBC has failed to meet the policy requirements placed on it regarding Green Belt land, and that its proposals in respect of Tudeley and Paddock Wood are therefore **unsound** and should be withdrawn from the PSLP

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 I acknowledge the challenge TWBC faces in balancing the competing demands for housing with the need to protect the Green Belt. However, the NPPF and other guidelines are clear about the need to preserve the Green Belt. The council therefore needs to investigate alternative sites, engage more pro-actively with neighbouring boroughs that do not face similar constraints on Green Belt, and if necessary declare that the OAN is not achievable. Government guidance on this is set out in a range of ways:

a. Recent guidance (April 2021) encouraged greater scrutiny of urban areas:

(see web link). Specifically:

(1) "In relation to the cities and urban centres uplift, we have heard representations that we can do more to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method. There are three strong reasons for doing so. First, building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops. Second, there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces. And third, our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel."

b. TWBC has examined only settlement options presented to it through its Call for Sites, a reactive approach, and has not adopted a more pro-active approach of searching out sites suitable for garden settlements outside the Green Belt that could be acquired through compulsory purchase or other means.

(1) The planning guidance on this clearly encourages a pro-active approach (see web link):

How can sites/broad locations be identified?

"When carrying out a desktop review, plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed)"

"It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area" (Paragraph: 010 Reference ID: 3-010-20190722)

2. Given this policy context, I believe TWBC needs to take a second look at some areas it has currently discounted from consideration. For instance, Frittenden lies outside the Green Belt, is in a very rural area (similar to the proposed development at Tudeley), benefits from a railway station at Headcorn and (a little further away) a separate railway line at Ashford, and would yield around 1,500 dwellings, yet is declared in the SHELLA as unsuitable in the following terms

(see web link):

"Matters relating to the very rural setting and remoteness of the settlement, highway infrastructure, and distance from access to high level services and employment, heritage and land ownership mean that this site is unsuitable"

I appreciate that the fragmented nature of the land parcels would require more effort from TWBC, including a more active role in masterplanning, and that investment would be required in the road and gas network. However, a level of infrastructure investment will already be required for the proposed Tudeley settlement, so at a superficial level the two options are comparable. More fundamentally, exploring options such as Frittenden could ease pressure on Green Belt whilst allowing the vision of self-contained garden settlements to endure.

3. Similarly given the policy context, even at this late stage, TWBC should establish a dialogue with neighbouring LPAs that do not face similar Green Belt or AONB constraints (notably TMBC and Maidstone) to explore the scope for them to address some of the identified need from TWBC.

4. If these various avenues do not allow TWBC to achieve its identified needs, then per the planning guidance the PSLP will need to declare this.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I feel strongly that Green Belt land should be maintained for that purpose and would wish to contribute to any discussion on this topic.

Comment

Consultee	Andrew Richards ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Andrew Richards ([REDACTED])
Comment ID	PSLP_2113
Response Date	03/06/21 21:42
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr Andrew Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is sound	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Tudeley

1. The proposed new Tudeley garden settlement is located in the western part of the Borough and will inevitably lead to a huge growth of commuter traffic into and out of Tonbridge, which is already congested, and onto the Tonbridge rail link into London. This line is already at capacity and the policy is therefore **unsustainable**. Growth should instead be encouraged in alternative areas within the Borough that are capable of channelling commuter travel towards alternative rail links, such as those provided through Ashford.
2. The proposed new Tudeley garden settlement will represent a serious degradation of the Green Belt (see also separate representation), not justified by the "exceptional" threshold.

Question 6

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STR/SS 3 should be withdrawn

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1877
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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In the Parish of Capel is a very small little Hamlet called Tudeley. The development of Tudeley is to essentially build a New Town on the edge of Tonbridge and within yards of the borough of TMB and 1.2 miles from the edge of Tonbridge.

The site will use precious grade 1 Farmland- designated Green Belt Land- overlooking a Wetland Habitat Floodplain, which it will negatively impact. It will cause great harm to the town of Tonbridge and will cause flooding downstream to neighbouring villages- East Peckham and Yalding. It will harm the setting of a world renowned Grade 1 Listed Church with all of its windows by Marc Chagall. It is globally unique and should be better protected and finally to cap it all the residents of this so called 'Garden Village' (Read NEW TOWN) has a railway line bisecting it and it is one of the busiest in the country.

As a strategy it absolutely stinks of a stitch up. i.e there is just one landowner and TWBC have taken an easy planning option. It is Totally unjustified and is not consistent with national policy. How can such destruction be legally compliant and TMBC cannot believe what TWBC are proposing! This strategy is unsound and unneighbourly -and will cause great harm to the surrounding areas -both to its inhabitants and countryside..

Green Belt The strategy relies on removing the site from designated Greenbelt- 7.603 hectares. Given that the key points raised at the Issues and Options consultation was the protection of the Green Belt, the preparation has not been positively prepared as it goes against your 15th page of the Local Plan.

Removal of Green Belt Land NPPF 133 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

NPPF 136 states, 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.' TWBC aims to release land from the green belt through a 'plan led approach' and to increase public accessibility and to protect the openness of remaining green belt. TWBC have failed to justify the need to build at Tudeley. Releasing Green belt land should not be a strategic objective. Protecting should be. On the 31/7/18 TWBC refused planning permission on a minor development to the Poacher Pub (a thriving business) Application Ref: 18/01767/Full. The refusal was on the grounds and I quote, 'the proposal would constitute inappropriate development within the Metropolitan Green Belt which by definition is harmful to its openness'. It continues to state, 'there is insufficient evidence of the necessary

'very special circumstances' to overcome this harm. It further states, 'it would not conserve and enhance the rural landscape, nor would it protect the countryside for its own sake, nor preserve the interrelationship between the natural and built features of the landscape'. SO a pub can't build one building but TWBC can within a year propose 2800 homes?

The only special circumstance for planning to build a town (forget garden settlement) is that there is only one landowner to deal with and it is conveniently, not going to impact on TW borough at all, being located at the most northern extremity of its coverage. All community charge council monies will be picked up by TWBC, not TMBC, who will be left with a mega headache. This is a win, win for TWBC. Totally unjustified.

When it suits TWBC to build on Green Belt land -that is called 'exceptional circumstances' for the Poacher, TWBC can 'use NPPF 133/136 and 145. And it is not 'exceptional circumstance'. I call it 'double standards and unsound and unjustified. .On page 68 of the local plan 4.130 TWBC state they will continue o apply the relevant NPPF guidelines as usual -just not for those in the Table6 on pages 67 and 68.As I said double standards .Individuals as well as TWBC have to obey the law and follow guidelines.

NPPF 145 states A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The exceptional circumstances- a) to g) do not apply to The Tudeley Proposal. Recent government thinking, ' Government response to the local housing need proposals in 'Changes to the current planning system' Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in **Paragraph 11b of the NPPF** or our **strong protections for the Green Belt**. It is for local authorities to determine precisely how many homes to plan for and wherethose homes most appropriately located. In doing this they should take intoaccount their local circumstances and constraints. The new thinking is effectively saying that there is a **presumption Against** objectively assessed housing need within their area if this would erode the green belt i.e. TWBC do not have to build SO many homes.

The main concept of the green belt is prevent urban sprawl and this is exactly what TWBC IS proposing -essentially a line of housing along its northern borders stretching from Paddock Wood through Five Oak Green , Capel , Tudeley to Tonbridge. This type of 'plan ' **IS** exactly what the whole chapter 13 of the NPPF is there to prevent.

Wetland Floodplain Habitat

I am utterly amazed that TWBC have produced no assessment for the Wetland Floodplain area below the Tudeley site.The whole of the Floodplain habitat from Paddock Wood / Five Oak Green/Capel and Tudeley. An area that will be affected by this proposal does not warrant an action and yet this 'plan' is building 85% of homes along this sprawl?.

It has therefore not prepared and has not followed the NPPF guideline 177 . 177The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessmenthas concluded that the plan or project will not adversely affect the integrity of the habitats site.

A report on what species thereare and the effects of noise and light will have on this area should have been completed. As the flood plain at Tudeley does not cover TWBC area it has not classified this area as – which it is- a Local wildlife site and have as a result not given the full story to their ;Masterplan'. I think some honesty would be helpful- as such I find this lack of assessment on habitats in this area to be unsatisfactory and therefore unsound. 1.15 of the biodiversity evidence base publication states,' local authorities have an important role to halt loss of biodiversity.' I see no co-operation here in TWBC speaking to TMBC about the effect on the floodplain at Tudeley which all councils should be concerned about. The wetland at Tudeley should be classified as Fen /Marsh and Swamp under UK BAP Priority Habitats, just because this area is not within TWBC it IS being effected by the 'masterplan at Tudeley' and as it has not been properly investigated at Reg 19 this proposal for so many homes to be build above this area is unsound. I would like to draw attention to the Kent Habitat Survey-section-1 executive- summary-pdf page 8. The pictures shown here are exactly the environment at Tudeley.

This whole area needs to be surveyed and assessed before ANY decisions are made. I can find no specific assessment of this area - a huge omission given the large number of homes suggested.

Farmland This 7.603 hectares is Grade 1 Farmland and is part of the Green belt, apart from the Green belt objections above this is not effective use of a precious commodity. The country needs to eat. As part of the Medway Floodplain, the alluvial soil is very fertile soil. We should not as a Strategy for the country be building homes on the best soil. This plan to build on this land is not effective use of a resource. Tonbridge

Question 6

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There is no justification for building at Tudeley- ever.

Question 7

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For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

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Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1893
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.10
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR 1 The Development Strategy

Policy STR/SS3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR 1 and STR/SS 3 – see Comment Numbers PSLP_1890 and PSLP_1893]

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

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The Strategy for Tudeley Village

Site Reference : Sustainability Appraisal: Capel Reasonable Alternative Option 1 Land at Tudeley site 446 and 448

In the Parish of Capel, Tudeley, is a very small little **Hamlet**. The site overlooks the Medway Floodplain. The 'Masterplan' is to basically built a **Town** on the edge of Tonbridge-1.2 miles away. **This is no garden village**. The whole Tudeley site is bisected by a railway line- one of the busiest in the county. This is not ideal for the potential occupants- who wants to live near a railway line? The original plan was to have a railway station and Tudeley. The cost of this proposal it would cost millions and the bridge over the railway line would need to be widened, Apart from the fact that British Rail have not said yes to this proposal- bearing in mind that there is a very short distance to Tonbridge by train- there seems little point in them doing so. Tonbridge which is not in the borough of T.Wells is small compared to T.Wells itself. Tonbridge suffers from being prone to flooding and has two pinch points at either end of the High street the River Medway and Tonbridge Rail Station, (which from a rail point of view runs North /South and East/ West and has Eurostar zooming through it too.) It only takes one small set of road work to bring the town to a standstill. All arteries to the town are gridlocked. The belief that the potential town at Tudeley (which could for all intense and purposes be a commuter town) will not add to the chaos at the station in the morning and afternoon is laughable-and that is without TMBC adding more homes in Tonbridge. There is just no available space to accommodate this increase in Traffic. The use of bikes and walking in the winter will only be used by the hardest of individuals. There is the added problem that currently, there was at Reg18, 5,206 (probably more in the next academic year) pupils attending schools between the Woodgate Roundabout and Brook Street. There is also a private school Somerhill near the Woodgate roundabout with a further 750 plus pupils. There is just not the capacity to accommodate another town so close to Tonbridge. Tonbridge is creaking under the strain as it is.

In suitability p7 of 17 TWBC state this site is considered a suitable location and sights NPPF 72 to support this claim. This statement is not true and unjustified. Tudeley is not a suitable location and is unsound.

NPPF 72 and TWBC state such, "an approach is acknowledged in the NPPF, which states (at paragraph 72) that "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements..."

This is the justification for building on Green Belt Land. The release of which is against NPPF guidelines and recent 1 April 2021 government guidelines- counters these arguments..

The government response to the local housing need proposals in, 'Changes to current planning system update 1/4/21' states :-More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. But harm or homes is not a binary choice. We can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and greenspaces communities most value. If we do this well, we can achieve all this whilst giving a new generation the chance to access the homes they deserve. The same chances generations before them were given. This is a matter of social justice and inter-generational fairness. It would be wrong for our built environment to respond only to the needs of older, wealthier people. We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.

Tudeley also happens to be owned by one individual, so makes life very easy for the planners to deal with one person and not multiple landowners. Taking the easy option and creating harm as a result should not be a Local Plan.

This site will provide substantial housing- which will be a commuter TOWN – Village is an incorrect and inaccurate – misleading term..5.220 The site is on the small minor road B2017 between Tonbridge and Paddock Wood The distance from Tonbridge is 1.2 miles (I have measured it) to Paddock Wood 2 miles (I have used TWBC measurements) The scale of these homes between these distances is 6,800 homes this is not a development it is a concentration and a sprawl. The proposed Tudeley site is not a vision it is a nightmare to those Living in Tonbridge. This urban sprawl is unjustified

The Tudeley site provides 38.9 % of TWBC 's need' and Paddock Wood 58.9% numbers making a total of 6800, make up 945% of the minimum allocation of 7221 dwellings. I do not call this a 'vision'. I call it the 'easy option' facilitated by an offer- in the case of Tudeley to use prime agricultural Green Belt land. The only 'vision' I see at Paddock Wood is yet more problems with sewage and flooding. I would like to also point out that your Map on page 35 of the Local Plan is very misleading in terms of scale of growth. At first glance it would appear that Tunbridge Wells will grow massively, but what it really shows is small growth around established towns coloured grey and small dwelling growth in pink around these centres. Where the real growth is, - are the much larger pink rings at Tudeley and Paddock Wood. Maybe a Map showing the number of dwelling increases in the borough by towns would be more honest? This map is not effective in helping to understand the numbers TWBC have proposed elsewhere.

TWBC state that a new settlement can be an extension to existing villages / towns. Well, Tudeley is a hamlet on Green Belt Land and the town it will effect -is Tonbridge. For all the above reasons a location near Tonbridge is not well located. It is not an appropriate site for a garden/new town and the infrastructure will not support the community at this site. Journeys will be made to shops in both Tonbridge first and secondly to Tunbridge Wells.

a) There will be no environmental gain because: 1. The land is grade 1 farmland above a wetland landscape on Greenbelt Land. No environmental gains. 2. The infrastructure here is poor and the railway station is not going to be built for reasons explained above. Argument unsound. b) The expectations of employment are unrealistic, especially as TWBC are proposing a **major employment allocation site** on the other side of the A21. One begs the question why not put a garden settlement there, as this will facilitate low carbon commuter-walking. There is also as a result of the constraints in Tonbridge there is no good access this side of the A21 and road improvements from Five Oak Green/ Tudeley/ Tonbridge are 'offline.' Therefore, poor access - apart from some roundabouts improvements which will not help throughflow -because of the sheer volume of traffic. Other employment is likely to be in London – i.e. a journey to Tonbridge Rail Station. c) the building of this site will cause major traffic

gridlock into Tonbridge -again not a headache for T. Wells but local Tonbridge Residents.d) This proposal is already on a Greenbelt site

This proposal will have far reaching effects on the Medway floodplain below. **This point e) assumes that the site for a garden/town settlement is not on Greenbelt land.** The NPPF pt143 Proposals affecting the Green Belt states- inappropriate development, is by definition, harmful to the Greenbelt and should not be approved except in very special circumstances. (TWBC trying to fill its housing quota is not good enough especially when the consideration below are taken into consideration). Pt145 of the NPPF states a local planning should regard the construction of new buildings as inappropriate in the Green Belt. None of the exceptions apply. The above comments make para 72 considerations unsound. This site will not provide opportunities to create strong links to the key nearby settlement i.e. Tonbridge -it will however cause big headaches for every resident in the town of Tonbridge.

This site is not suitable and not sustainable. It is totally and unequivocally unsound and unjustifiable. The vision of this site was enabled by the offer of one landowner and then TWBC have leaped at the chance to build thousands of homes on an inappropriate site. The inhabitants of this site will mix with the surrounding towns – it is not going to be a 'perfect bubble' and stand alone.

(TWBC Comment: Map included within comments has been appended to this comment)

Appendix D shows by 2080 the flooding will cross the Sharneden Road and flood the lower of the garden settlement. The winter of 2019/20 was a taste of what is to come with global warming and the Appendices of 2016 could prove to be a bit optimistic. In my response to Reg 18 in 2019 I said the Hartlake Road would need to be raised and a few months later in early 2020 you could swim along the road. My prediction was correct. I have to ask is this why there is a proposal to close the Hartlake Road -to solve the problem of flooding by closing access across the floodplain -totally- and as a result instead create gridlock in Tonbridge and Five Oak Green for locals in Hadlow and Golden Green- which are in TMBC? Is this how TWBC cooperate with TMBC- by railroading the inhabitants of Tonbridge/Hadlow/Golden Green/East Peckham and riding roughshod over them? Duty to cooperate missing here.

In the winter of 2019/20 all the dykes were full and there was surface water on all the fields. When I use the word biblical -it was. The whole of the Tudeley site is totally inappropriate and unsound. This site should not be used for a new town. The ramifications for houses downstream in East Peckham and Yalding from runoff are real and the potential for the houses lower down the slope at the new town are as well.

I would like to note that should this site have been within TMBC boundaries -barely metres away- I do not believe they would ever have considered Tudeley as a viable site because at the TMBC Planning and Transportation Advisory Meeting on 2/10/19 no one in the room was happy- because they are fully aware of the fact that flooding will occur beyond Sharneden Road from the Medway River and by 2020 it almost did! The site at the Hamlet of Tudeley is totally unsuitable and unsustainable. Locals know this area is more like a wetland area, home to many species of birds and the pollution from 2800 homes on the horizon will do damage to this environment. It would be unsound to build here. In the winter of 2019/20 all the dykes were full to capacity and there was surface water on the fields. When I use the word biblical -it was. The whole of Tudeley site is totally unsound. This site should not be used for a new town. The ramifications for houses downstream in East Peckham and Yalding from runoff are real and the potential for houses lower down the slope as well.

The exception tests NPPF would fail here as a) the development will cause harm downstream and b) The development- only parts- of would be safe for a life time (deemed 100 years). As both elements should be satisfied to allow development NPPF 161- this development should not be allowed.

Tudeley lies on a ridge above the Medway Flood Plain and this means the precipitation on hard-standing areas, of 2,800-5000 homes- will cause faster run-off during a large event- into the flood plain below, it is also on a site on Wadhurst clay that is normally found in rural outcrops – as here- and is not normally built on. Where it has been this soil is prone to slippage- which could cause problems for a large housing development especially with large run off.

In the Transport Strategy Review: context and way forward page 28 it states: "Enabling growth without gridlock has been highlighted as a key challenge for Kent & Medway and one that will only be achieved through a combination of measures that influence behaviour and improve infrastructure." Bearing in mind that although TWBC still believe that British Rail have not said yes or no to building a new station- how can TWBC have a 'masterplan' for Tudeley which assumes a new station **will** be built. The time

issue (there will be no time for the train to gather speed between Paddock wood and Tonbridge) apart from the cost it is totally impractical for BritishRail to build a new station when the current stations are already close enough? The railway bridge on the Hartlake Road will need to be widened too. There are also plans to close the Hartlake Road- which is the only crossing point across the Medway floodplain. This is the only road that shortens the distance from T. Wells to Hadlow and Golden Green, without either going around the Industrial Estate in Tonbridge along the A26 or travelling through Five Oak Green and East Capel where TWBC are also planning more housing . All I can envisage is sitting in my car and pumping out more fumes while I wait in Gridlocked Traffic. How can this be classified as sustainable development? **The Hartlake must not be shut!!!!!!** This document talks of ideals -it does not concentrate on the biggest changes in population and hence traffic conditions in the TWB area i.e. Paddock Wood and Tudeley. There is no explanation as to how this is to be **practically tackled** . In fact Fig 5 shows the route between Paddock Wood and Tudeley as 'Off-line' whatever that means? Pt 7 in the Transport Strategy States, '.... road transport contributes to a third of Kent's CO2 emissions and pollutants have negative effects on air quality in addition to noise and consequently on human health and the natural environment.' So how can a proposal to build 6390 homes between Paddock wood and Tudeley bringing a minimum of 6400 probably more like 8000 to 9000 extra cars on the B228 between Wetsted to Seven Mile Lane/ the B2017 from Five Oak Green to Tonbridge and the B2015 from East Peckham to Watlington. This scenario is so unsustainable, so undeliverable it is laughable and this is called a plan? Point 109 of the NPPF states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. I think these proposals are so severe point 109 should be upheld and planning refused on these grounds.

The report drawn by SWECO for TWBC is very illuminating – basically the work was undertaken to understand what mitigation levels can be achieved to reduce congestion- and has been written in cooperation with the team working on the Garden Settlement plan. Can I ask if TMBC were involved in these talks ? The minutes of the meeting with KCC Dtc Appendix H4 dates 16/9/20 , 11/11/20 and 19/1/21 , 8/2/21/23/2/21 Also Appendix H2 Highways England 7/2/2020 and 3/2/2021 are unavailable be electronic copy. I cannot see how this report is not biased towards a positive outcome for TWBC.

The main thrust of mitigation, so I understand , is to have a hugely improved bus service and cycle routes. This for a country where people like driving cars (comfortable) and it rains a lot and only hardened individuals use their bikes. Most congestion occurs at peak times as the report says and this is because individuals are either going to school or work. Bus services will solve school traffic but I cannot see cycle routes being used for long distance in the autumn/winter/spring for commuters. Cycle routes will be used as a recreational asset. I live in Hadlow and am really cross that because TWBC are so hell bent on building a new town at Tudeley and don't even humour me by calling it a garden settlement that I will no longer be able to drive along the Hartlake Road / B2017. There are nearly 6000 residents in Hadlow and Golden Green and we shall be unable to cross from T. Wells to Hadlow via this route. It is the **only** road across the Medway Flood Plain. Instead we shall have to sit in extra traffic trying to go through the Tonbridge Industrial Estate off the A21 now even more congested or travel through Southborough and Tonbridge Town centre sitting in traffic causing CO2 emissions as I shall be stationary for so long or travel the very long way round and go via Five Oak Green and turn off the A228 at East Peckham and follow that route to Three Elm Lane. Taking as a starting point the A264/A21/A228 junction my 14.5 k short cut that takes about 15/20 minutes will now take an extra 10 minutes and add 4k on to my journey through another small village of I could go down 7 mile lane and travel an extra 7k and add an extra 15 minutes to my journey as the roundabout at Alders Wood will be chronic. **The Hartlake Road must not be shut.**

This all because TWBC want to build homes at Tudeley and Paddock Wood/Capel (94%) of their allocation and cause chaos for anyone else but not their residents, as these areas are right on the edge of their boundaries and won't affect their residents- in their more leafy boroughs. I do not believe causing me, along with other residents on the North and Eastern side of Tonbridge so much inconvenience and extra cost and time can be sustainable in terms of emissions just because TWBC believe they can justify building a new town right next to Tonbridge. This is unsound and the extra amount of traffic will cause so much extra traffic on roads that are difficult to improve and **ALREADY CONGESTED**. The only way to 'improve' through traffic is to dual the B2017 from the Badsell/ Capel Grange roundabout all the way to the roundabout near Somerhill School and dual from there to the A26 the Woodgate Roundabout near the A21 and Vauxhall pub. There is no way to 'improve' the A2014 from the Vauxhall pub to the Tonbridge Train Station for cars or bikes and the footpaths are overcrowded with school pupils.

The mitigation schemes are not viable because of the limited available space and topography constraints. The roads around this area are not capable of taking the 'load' of extra traffic. Page 89 10.3.2 Highways England say there is a need to demonstrate how proposals will reduce car trips and improve accessibility for all modes and only then consider appropriate and proportional mitigation, measures that assess the likely impact of residual car trips. HE goes on to advise local planning authorities to "refuse or place conditions on developments only where the residual cumulative impacts of development on the capacity of the SRN (once proposed mitigations are taken into account) are still assessed to be severe." In Paragraph 41, HE also states that the promoter should take all reasonable steps to minimise the level of physical mitigation required, through the use of measures such as Travel Plans and travel demand management measures. Consequently, a key aim of the Local Plan work outlined here is to minimise the residual new car trips on the highway network that would need further physical highway mitigation measures.

TWBC have shown that there is a need to mitigate new car trips but realistically who is going to use a bike who will make regular use of a bus service. Individuals for the most part will use their car whenever possible and that is what will happen here. This report presumes too much on the alteration of human behaviour at peak traffictime.

It took over 40 years to improve the A21 just from Tonbridge to Pembury – hardly a great distance, How long before these other so called 'mitigation measures' are implemented.-which will not alleviate the traffic congestion! It seems ridiculous to me why you would want to build on the Tonbridge side of the A21 anyway -when as I said after 40 years waiting for the A21 --,TWBC have build bicycle routes on the other side -all the infrastructure IS ALREADY on that side of the A21. THIS is where you need to make use of the infrastructure that is already in position. **Why waste more public money ?** Also with houses on that side of the road – some homeowners will use High Brooms Rail station which would alleviate the pressure on the access to Tonbridge Rail station. The Medway and its floodplain too -are miles away-. on the other side of the A21.

The KCC West Kent 'Map of Transport Priorities for Tunbridge Wells shows NO improvement of roads between Paddock Wood and Tonbridge- only the a228 Colt's Hill Relief Scheme and junction improvements. No plans to improve the infrastructure any time soon for Tonbridge Residents then. Unsound!

This report does not persuade me that the traffic congestion in Tonbridge – that the Tudeley development will cause- will be solved and is therefore not viable/workable/ and is unsound. It also has the **gall** to for the 'convenience of implementing this development -to close the Hartlake Road which is totally **unacceptable** as not only will this cause even more congestion in Tonbridge, It will add more CO2 into the atmosphere as Tonbridge residents queue around the Tonbridge Industrial Estate- THAT is not so EFFECTIVE then is it ?. Does TWBC have any consideration for others, so intent .are they to build at Tudeley- residents of North Tonbridge , Hadlow and Golden Green can have their lives disrupted and go hang. MP Tom Tugendhat and TMBC are all of the view this development is not justified and unworkable and unsound. The Tudeley development will add 25% to the population of Tonbridge and that is before TMBC look to accommodate their own 'need'

5.218 TWBC state that this development provides an opportunity for a new rail station at Tudeley- if this can be realized in the future after 2038.. This is a ridiculous statement to make. This station will never be built as Tudeley is too close to Tonbridge rail station- so why put it in this local plan-it is a disingenuous statement to make.5.224 The infrastructure will not be able to support a minimum of 2,800 cars. The by pass at Five Oak Green will not be used by Tudeley residents, so this will not alleviate highway issues caused by development at Tudeley New Town- (not garden city – this is just a posh term) as they will all be travelling in the other direction to the A21 and Tonbridge Station and improving the roundabout near Somerhill school will not enable the traffic to flow.

Policy STR 2 p45 states all new development must use the following principle relevant to its location, scale and use.

Point 1 Fails here as it does not enhance the quality of existing communities and their environs and creating a town at Tudeley is not appropriate.

Point 3 Conserve and enhance assets of historic, landscape or biodiversity.TWBC Fail to save the listed church at Tudeley from being surrounded by 2,800 homes and fails to save Green Belt land and the wetland floodplain below and the biodiversity value- which they have not even bothered to assess.

Point 9 TWBC will protect the future residents and users with regard to noise, vibration (difficult with the number of trains bisecting the site), smell, loss of light, privacy and overbearing impact. I am sure the existing residents of Tonbridge would like to be treated with such consideration themselves.

Policy STR 9 Green Belt States an effective Green belt will be maintained through the application of national planning policy and believe the removal of Green belt land in this plan is fully justified there are NO exceptional circumstances and the objections above show how much harm this development will produce to the surrounding countryside and existing residents. THIS DEVELOPMENT IS INAPPROPRIATE -NPPF 145 AND THERE ARE NO EXCEPTIONAL CIRCUMSTANCES. This plan regarding Tudeley should not be allowed it is unsound does not have any backing from TMBC or the MP for this constituency, has been poorly prepared with regard to its surroundings, constraints and existing residents, not legally compliant as it fails NPPF guidelines 133, 134 a)-e) 136, 137, 143, 144, 145, 155, 157. 160. 161. 163. Totally unjustifiable.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The development of Tudeley was only considered when a single landowner offered the site at Tudeley. TWBC have made every effort to make this Development work in a totally inappropriate site and are determined to push this so called 'Masterplan' through. I consider this proposal a disgrace to the planning process on so many levels. I should be stopped altogether.

I think TWBC should look to spread a reduced need throughout the borough, concentrating on towns and villages that have existing good bus routes into T. Wells. I believe there should be a mix of bungalows and affordable housing throughout the borough. I would look to build a little more old peoples residential housing in the Benenden area to make use of a hospital there-, which would reduce the pressure on Pembury Hospital and could if planned well reduce the pressure on Social Services. I would look to have greater amounts of affordable housing for younger generations in some of the largest towns- Tunbridge Wells, Southborough and Pembury – as well as in some of the smaller towns and villages as I said above.

I believe the concentration of development along the northern fringes of the borough to be nothing but urban sprawl. I also strongly disapprove of a 'plan' to build on land known to flood and all these proposed homes have the river Medway behind them-. and will either flood themselves or cause harm further downstream.

This local plan is fundamentally flawed because TWBC have not pushed back on their 'need' and have relied on only three inappropriate sites to fulfil this 'need' and have chosen to deal with very few landowners -making life easy.

The borough of T.Wells planning should not be easy with the amount of ANOB and GREENBELT land. JBA consulting did a comprehensive assessment of the flooding or lack of potential for all the first call for sites. I would have only looked at flood Zones 1 and 2 and only then slit those into good/ bad bus routes -then visited them all. TWBC seem to have concentrated on nearly all the sites prone to Flood/or cause harm elsewhere as their starting point. A flawed plan.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1858
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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I note that the ' Assessment summary 4.2 has no negative outcomes yet bearing in mind one environmental objective (E1 and E9) to protect and enhance biodiversity and functioning ecosystems and protect and enhance landscape. TWBC have failed at Tudeley to do that i.e. negative outcome . Next (E5 and 6) to protect air quality and green house gas emissions -well the amount of traffic that will be grid locked in Tonbridge as a result of the 2,800 homes 1.2 miles from the edge of Tonbridge will also be a negative. E8- to protect and enhance and cultural heritage. Building 2800 homes around a Grade 1 Listed building mentioned in the Domesday Book under the name of Tivedale and being famous as the only Church in the world that has all its 12 windows being by Marc Chagall would not 'enhance' and protect this site. Its idyllic setting is part of its charm. This effect will be negative. TWBC's seems to think there is nothing negative about this site at all which is totally untrue. This assessment is inaccurate and totally unsound as well as being years out of date. Unsound. The conclusion: The 2015 Kent Environment Strategy vision is that Kent will benefit from a competitive, innovative and resilient economy, with natural and historic assets enhanced and protected for their unique value and positive impact on society, economy, health and wellbeing. Is a load of old nonsense- Tudeley and Tonbridge won't.

.P.S..FYI The Tudeley site is on Wadhurst clay and houses would need to be piled as these outcrops are prone to slippage. Landscape and Remedial Works in Wadhurst Clay Pugh/Weeks 87/88

Question 6

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Do not build at Tudeley

Question 7

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Comment

Consultee	Mrs Carol Richards [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mrs Carol Richards [REDACTED]
Comment ID	PSLP_1860
Response Date	04/06/21 11:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mrs Carol Richards
Question 3	
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Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not justified
- . It is not consistent with national policy

Question 5

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I find statement 1.31 at odds with your proposals. You plan to put 85% of new homes on three sites one on greenbelt land (Tudeley) and there has been no detailed Habitat assessment at all and all you write about is The Ashdown Forest - which is miles away from your flood prone northern boundary where you plan to put 6800 homes. The wetland area is home to many bird species and TWBC have no idea what they plan to affect. How sound and sensible is that?. It is negligent. I think a habitat assessment of the wetland area below the Tudeley site is long overdue and should have been completed in 2020 before reg19 was published. This is a huge oversight when TWBC plan to destroy a Green Belt site. Not legal, not sound , not positively prepared -as there is no report, not justified

This development will be widely visible from the surrounding countryside and landscape and from existing residential areas and heritage asset in Capel. It will be visually prominent and urbanise this attractive rural area and will 'light up the night sky' over a natural habitat for birds and wildlife disrupting behaviour in flora and fauna. *The impact of light pollution is particularly harmful in the open countryside, where rural character is eroded and the distinction between town and country is blurred; likewise, light pollution can also compromise the architectural and historical character of conservation areas, and listed buildings or their settings. The full effects of artificial lighting on biodiversity are not fully understood, but nocturnal animals can be seriously affected by artificial light at even very low levels, adversely affecting their ability to feed and reproduce.* TWBC seem to be ignoring their own rules in relation to the effect on wildlife in the flood plain below Tudeley. TWBC are- by building above the flood plain- will be contributing to the loss of biodiversity and habitat. This development will not improve the natural environment. It will create much harm- against NPPF 174 b).

TWBC have not bothered/ failed to even produce an assessment. I suspect because the results will not support their scheme to build at Tudeley

NPPF 177 The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Question 6

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There is no modification or legal process that can negate the damage to an idyllic Green belt site harming a diverse wetland habitat.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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Future Notifications

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Comment

Consultee	Howard Rogers [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Councillor for the Hadlow, Golden Green & East Peckham Ward
Address	[REDACTED] Tonbridge TN11 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Councillor for the Hadlow, Golden Green & East Peckham Ward [REDACTED]
Comment ID	PSLP_1512
Response Date	02/06/21 19:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Cllr Howard Rogers, Tonbridge & Malling Borough Councillor for Hadlow, Golden Green & East Peckham Ward
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: response set at Policy STR/SS3 and STR/CA 1 - see also PSLP_1515]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

In advance of the close of the Regulation 19 consultation on the Tunbridge Wells Borough Council Local Plan on Friday I write to express my views and concerns about the impact of this plan on my ward and Borough.

As you may realise my ward lies closest to the main housing proposals within this plan and the bulk of the proposed housing developments for all of Tunbridge Wells lie within a few miles of Hadlow, Golden Green and East Peckham. I therefore address most of my comments to Policy STR/CA1 The Strategy for Capel Parish and Policy AL/CA1 Tudeley Village. My home and those of the people I represent as well as my immediate hamlet neighbours lie on roads that will be significantly affected by these proposals.

When considering the overall impact of the TW local plan, my memory turns to several years ago when this Borough was drawing up the first draft of our own local plan. As Cabinet Member for Strategic Planning and Development at the time, I recall the hours that I spent with Steve Humphrey, Ian Bailey and his team pouring over maps, population projections, strategy documents, planning guidelines and countless other documents in drawing up a plan which was based not just on housing targets and government diktats but on what we knew to be the needs and desires of our local residents and also on common sense. This resulted in a Plan that was based on firm evidence, and did make sense. I remind members that the Inspectorate has halted the progress of our plan not on its solid and thoughtful content but on the inspector's perception of the process and procedures that were involved in our Duty to Cooperate with neighbouring authorities. I can only assume that many similar hours have been spent in Tunbridge Wells planning department carefully considering and drawing up the plan we are debating tonight, but struggle to understand how that all came to the conclusions and proposals that are now in front of us. In summary, common sense and the needs of Tunbridge Wells residents seem to have been discarded in favour of these proposals which place the bulk of residential development on the very northern edge of their Borough, and then questionably and poorly addresses the effect of that development on the infrastructure and the communities that will be immediately effected.

Back in October 2019 the TMBC Planning and Transportation Advisory Board gave a very strong message to TWBC about our concerns regarding the impact of their plan at the Reg 18 stage. We raised specific issues about the likely impact of the proposals on the local highway network, rail services and other community infrastructure including health care and education, particularly when combined with planned developments in Tonbridge as part of our own Local Plan. One of my particular concerns was the impact on North/South traffic flows through the limited network of unsuitable and unclassified roads such as Allders Road and Hartlake Road. It would appear that this message has been considered, a significant problem identified and a somewhat simplistic solution put forward in the proposal to close Hartlake Road to through traffic somewhere near the Borough boundaries. I can tell you that at peak commute and school traffic times, the traffic rate along that road can exceed that of the A26 through Hadlow. What a dilemma, do we look forward to the prospect of living in a "Quiet Lane" as Hartlake was tentatively suggested to be by KCC some 20 years ago or do we face a future of even longer and environmentally damaging queues and delays along the A26 and A228 as more cars find alternate

ways to cross the Medway and access the Summerhill Schools, Tonbridge schools, shops, stations & jobs or travel further afield? Surely after not so long ago spending several million pounds on the new Hartlake Bridge, KCC are not going to accept that is no longer of use.

It would seem that the work done to model the resultant effect on traffic flows and predict increases in traffic movements has scarcely scratched at the cross boundary issues let alone the knock on effects along the TMBC side of the A26, Seven Mile Lane and the minor roads which act as peak bypasses and overflows. Indeed the modelling data appears to be based on aged surveys and shows little if no account of the development proposals within the TMBC plan.

My other main concern about concentrating housing development so close to our boundary is its proximity to the River Medway. My ward floods. Residents' homes and livelihoods are threatened and will continue to do so. This fact is acknowledged even by the Environment Agency who despite their major plan to increase the capacity of the Leigh Flood Storage Area has recently given the go ahead for a £1,000,000 Flood Resilience Scheme in East Peckham. While detailed provision and plans to counter the flood risk caused by development will be appropriate further down the planning cycle, I feel that the plan underestimates the consequences of such a significant number of new homes. The cumulative effect of these homes and the extensive permitted mineral extractions immediately to the north must be better understood and not considered in isolation.

As Chairman of the Upper Medway Internal Drainage Board, I have recently led its members to introduce a new scheme of Surface Water Development Contributions which is administered by the Water Management Alliance in King's Lynn. The land in this plan is currently agricultural and provides a natural means of absorbing rainfall. Even with strict compliance with SUDS requirements and local mitigation measures and leaky dams upstream the proposed developments with roads, driveways, parking areas and rooftops cannot fail to increase the flow of water into the Hammer Dyke and Alders Stream. Along with the increased areas of mineral extraction to the north a significant area of natural storage will be lost and this will add to the pressure on the existing drainage channels. The Upper Medway Board will be requiring significant contributions to help manage the consequence of this. These contributions will be in addition to any Section 106 and should be considered in relation to any viability assessments.

There is much else that I could add to my comments, but from discussions that I have had with my fellow Councillors, I know that they will write on these and I am sure you would rather hear directly from them rather than repetition from me.

In summary, I am of the opinion that the firm response and list of concerns that I, many of my ward residents and TMBC gave to TWBC in our response to the Reg18 submission back in 2019 have not been sufficiently recognised or countered by evidence in this next Reg 19 stage. I retain serious concerns about the direct effects of large housing allocations immediately on the border of our districts and with the nearest large conurbation being Tonbridge itself. The plan proposals will put heavy and long term demands on Tonbridge town while TWBC will reap the benefits of the additional Council Tax as well as meeting your housing need. The proposal to close Hartlake Road demonstrates a complete lack of co-operation shown by TWBC to my residents and emphasises that there is no desire to allow Hadlow or Golden Green to enjoy a potential increase in demand of its services, retail outlets or employment sites. Little if no compensation proposals are suggested to be in the Borough most affected. Lastly I contend that, the Plan is in denial of the detrimental effect on flooding issues in our communities and those in authorities further downstream of the Medway.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_3

Comment

Consultee	David Rowlands [REDACTED]
Email Address	[REDACTED]
[REDACTED]	
[REDACTED] Name	Pre-Submission Local Plan
Comment by	David Rowlands [REDACTED]
Comment ID	PSLP_82
Response Date	04/05/21 16:17
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Planning refusal 1801767.pdf
Question 1	
Respondent's Name and/or Organisation	David Rowlands
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a retired resident of Tonbridge and have lived here for 45 years, I worked in the town for over 20 years and now a regular walker in the area and an active member in the community.

Please add my contact details to your consultation database so that I can be kept informed of all future consultations on Planning Policy documents. I understand that my comments will be published by the Borough Council, including on its website.

Your plan to create a garden settlement of at 2,800+ at Tudeley and 4,000 at Paddock Wood will cause nothing but harm to the local community, environment and wellbeing of the residents of the Parishes of Capel, Paddock Wood and the residents of Tonbridge. The only benefits are to **TWBC** through receiving the council tax of these new dwellings and that it solves 60% of what we believe is their incorrect housing targets with one Vendor without them having to investigate their local brown field sites and other smaller sites within Tunbridge Wells and that they would happily use 600 acres of our green belt.

- 1 My objections are as follows: - (Please note you have already rejected planned building in this area for building only 6 B&B rooms)
- 2 **GREEN BELT:** - Losing 600 acres of Green belt and creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land and should be protected. It will spoil the landscape and kill wildlife, clean air, and This area should remain rural with agricultural land that can be used to provide food. And to quote from Rejected building application 31st July 2018 **REFERENCE: 18/01767/FULL**.

The proposal would constitute **inappropriate development within the Metropolitan Green Belt**, which by definition is harmful to its openness. There is **insufficient evidence** of the necessary 'very special circumstances' **to overcome this harm**. The proposal is thus contrary to **Policy MGB1** of the Tunbridge Wells Borough Local Plan 2006, Core Policy 2 of the Tunbridge Wells Borough Core Strategy 2010, and the National Planning Policy Framework 2018. The proposal, by virtue of creating new buildings with associated domestic paraphernalia, works to alter the land levels and potential additional impacts from further parking and works in close proximity to the trees at the rear would have more than a minimal impact on the landscape character of the locality. It would not conserve and enhance the rural landscape, nor would it protect the countryside for its own sake, nor preserve the interrelationship between the natural and built features of the landscape. The overall impact is harmful to the rural character of the area. It would thus be contrary to saved **Policies LBD1, EN1 and EN25** of the Tunbridge Wells Borough Local Plan 2006, Core Policies 4, 5, and 14 of the Tunbridge Wells Borough Core Strategy Development Plan Document 2010, the National Planning Policy Framework 2018 and the Planning Practice Guidance.

- 1 **FLOODING:** - Note the danger of Flooding and threat to life as highlighted in rejected **planning** (quote from Rejected building application 31st July 2018 **REFERENCE: 18/01767/FULL**). It has not been demonstrated that the occupiers of the development **would not be at risk from**

flooding or **that the development would not increase flood risk elsewhere**. Therefore, the development is **likely to result in a risk to human life from flooding** and is contrary to policies EN18 of the Tunbridge Wells Borough Local Plan 2006 and Core Policy 5 of the Tunbridge Wells Borough Core Strategy 2010, guidance in the National Planning Policy Framework 2018 and the Planning Practice Guidance

- 2 **TRAFFIC:** - Increase in traffic in the region of 5000 vehicles on already congested roads in particular B2017 that will cause extreme high levels of Carbon dioxide (CO2) near at least 6 local schools queuing at current road junctions and roundabouts. The Office for National Statistics: - Household Labour Force Survey shows that: Percentage of households by combined economic status, April to June 2019 that 60% of households have both residents working which means at least one will use a car and 26% have one family member working which again no doubt will be using a car. I will be interested to see how you as stated achieve “ Zero and low carbon energy production to be considered during early design stages”
- 3 **INFRASTRUCTURE:** - Unacceptable increase of pressure and stress on local Tonbridge Doctors, Schools, Buses, Roads, and Parking, Tonbridge will become this garden settlement's town of choice as its much closer than Tunbridge Wells.
- 4 **TRAINS:** - Unacceptable increase of commuters on already overcrowded trains at Tonbridge with no room for any increase in carriages due to length of platforms.
- 5 **PARKING:** - Insufficient parking in and around Tonbridge now.
- 6 **SCHOOL:** - The proposed new senior school will draw children in from all of West Kent. It is a 40-minute walk from the over busy station of Tonbridge. And the plan has a railway line at the back of the school grounds.
- 7 **HERITAGE:** - Damage to environment around a very important prized heritage site – All Saints Church at Tudeley, with its world renowned stained unique stained-glass windows.
- 8 **Community:** - This plan will divide the communities of Capel, Tudeley, Paddock Wood, and Tonbridge who will pay the price for this disastrous planning application that threatens the wellbeing of all of these communities.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

If you would like to attach a file in support of your comments, please upload it here. [Planning refusal 1801767.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Chris Salter [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Chris Salter [REDACTED]
Comment ID	PSLP_1658
Response Date	04/06/21 14:42
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Mr & Mrs Chris Salter
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We conclude that the proposed local plan is not legally compliant, not logistically sensible and is not consistent with the NPPF.

Instead it is designed to benefit TWBC by providing them with enormous amounts of additional council tax revenue with little additional provision of services and piling the burden of this development on the infrastructure of Tonbridge town center. The only other beneficiary appears to be the single Landowners, who's family have acquired, nurtured and protected the land in question for many generations only to attempt to profiteer from it in the current one.

Tunbridge Wells town center is dying from under development and overcharging of rates to local business. There are many brown field sites available within the town center that could easily be developed for affordable housing, most notably the old cinema site which is located within easy walking distance of the railway station and the local shops. This would boost the town, reversing the alarming closure of the retail outlets, restaurants and bars.

TWBC has instead focused nearly all its efforts to meet house building targets on a single piece of Green Belt land, on a floodplain, in a rural setting with no suitable transport links, on the edge of the High Weald AONB, a few hundred meters from the Tonbridge border, either side of the mainline railway that links Kent with London.

This is quite frankly nonsense and they should be ashamed.

Many of our neighbours and friends have provided the suitable legal arguments as to why the proposed Local Plan is inadequate but this should come down to plain logical thinking from all concerned. We would be happy to debate the minutiae of the details, the affect on the local communities ,infrastructure, air polution ,damage to habitat etc.etc.

But, at the end of the day, it should be obvious to all, this is a really bad idea and should be rejected.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Julie Sanders [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Julie Sanders [REDACTED]
Comment ID	PSLP_705
Response Date	31/05/21 21:36
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Julie Sanders
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Capel Parish for 4 years with 3 children attending local schools. I work in the Maidstone and Tunbridge Wells NHS Trust.

During my time as a resident of Five Oak Green. I have already seen issues with flooding in the village, in February 2020. The area has a history of flooding even with the current approximately 900 homes in the parish. The proposed site of the Tudeley Garden Village with approximately 2500 homes on the flood plain of the River Medway could only worsen the risk of flooding for current properties in the parish, the proposed houses and properties further along the Medway. In February 2020, the area proposed for the development was under water and Hartlake Road impassable.

The proposed development of 'Tudely Garden Village' is green belt land and I consider to be an area consider to be an area of outstanding natural beauty. It is a rural area, teeming with wildlife and also contains valuable and productive farmland. I am extremely concerned that the building of such a large number of houses in one area would cause irreversible damage to the environment and destruction of the area's biodiversity. I feel that this would result in an urban sprawl stretching from Tonbridge to Paddock Wood

In human terms, the traffic along the B2017 and into Tonbridge is already heavy. A development of this size- over two and a half times the current housing in the parish at present would overwhelm the roads and cause a huge increase in pollution. Pressure on Tonbridge Station and other transport links from such a large development would be overwhelming and not sustainable

I feel that Tunbridge Wells Borough Council have completely ignored the valid arguments put forward in Regulation 18, from local residents, on the unsuitability and unsustainability of the Local Plan. It seems that the entire housing quota for TWBC has been dumped in an unsuitable site in one corner of the borough, away from the main centre in Tunbridge Wells, without considered thought. Other Brownfield sites and more suitable sites, such as the 'Castle Hill' development appear to have been ignored and dismissed.

I am not against building affordable housing, but object to the huge size of the development planned and unsuitability of the site due to environmental and logistical concerns.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Consideration of other more suitable Brownfield sites or closer to good transport links, such as the 'Castle Hill' Development

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Richard Sankey ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge TN10 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Sankey ([REDACTED])
Comment ID	PSLP_2018
Response Date	04/06/21 14:28
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Richard Sankey
Question 3	
To which part of the Local Plan does this representation relate?	Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel and

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Nos. 5.260-5.267 and Map 27

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified
. It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I believe that this document is unnecessarily technical and is designed to make it difficult for ordinary citizens with strong views own this policy to express their views, tilting the balance in favour of those who can afford the best technical advice i.e. the developers, landowners and the council.

I am not a resident of TWBC but I live very close by in Tonbridge and Malling and regularly visit or pass through the area affected by this proposal. I object in the strongest terms possible to the proposal to build such a large number of new homes on a Greenfield site in and around Tudeley/Capel. Quite apart from the loss of an outstanding area of beauty from an amenity point of view, on what is in any case land prone to flooding, it will place an intolerable extra burden on surrounding roads and rail services. Pre-pandemic I commuted to London and expect to again from later this year. I know exactly how bad congestion on both roads and rail services are, particularly in term time given the large number of schools in the area.

I am all to aware that this is an easy solution for TWBC to meet their housing targets while dealing with just the one landowner who will add to his already significant wealth. It shows a complete lack of imagination on the part of the council who show little regard for the residents of Capel parish; their views and opposition to they scheme were clearly shown in the results of recent local elections.

I ask TWBC to go back to the drawing board and come up with more a far more sympathetic solution to their housing needs, in particular making far batter use of brownfield and urban locations which are slowly emptying of their retail occupants. I believe that this could account for much of the housing needed. It would be a dreadful shame to see much of the area lost to such a scheme which would have a dreadful effect on local residents and place such a burden on existing infrastructure.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question

5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No further comments.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

No further comments.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ashley Saunders [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ashley Saunders [REDACTED]
Comment ID	PSLP_1288
Response Date	04/06/21 13:50
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Ashley Saunders
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
All	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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As per my previous comment to save duplication

[TWBC: see PSLP_1284]

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per my previous comments to save duplication

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ashley Saunders [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ashley Saunders [REDACTED]
Comment ID	PSLP_1270
Response Date	04/06/21 13:58
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Ashley Saunders
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Tudeley Village Capel	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	Don't know
Complies with the Duty to Cooperate	No

If you consider that the Local Plan is not sound, please answer this question.

Question 5

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

The development at Tudeley is being called Tudeley Village. A development of this size and with many areas of employment and shops etc... is not a village but a town. I believe this can confuse some people into thinking its something that its not.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Simple modification is to call it a Town which it is proposed to be and not a village.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? No, I do not wish to participate in examination hearing session(s)

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Supporting Information File Ref No: SI_131a-c

Comment

Agent	Mr Simon Bell ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Knights Solicitors
Address	Regency House 25 High Street Tunbridge Wells TN1 1UT
Consultee	Save Capel ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Save Capel ([REDACTED])
Comment ID	PSLP_1982
Response Date	03/06/21 18:51
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-1_Cover Letter.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-3_Appendices.pdf PSLP_1964 & 1973-1987_Knights Solicitors for Save Capel_SI-2_Representation.pdf
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Save Capel
Question 2	

Agent's Name and Organisation (if applicable) Knights Solicitors

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph No(s) 5.153-5.229

Policies Map (Inset Map No(s)) 31, 32, 33, 34

[TWBC: for further comments by Save Capel, please see Comment Numbers PSLP_1964 and PSLP_1973-1987]

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see attached: "Representation by Save Capel under Regulation 19", dated 3rd June 2021, and Appendices

[TWBC: the following extract is from "Representation by Save Capel under Regulation 19" - for the full representation and appendices, please see supporting documents]

6. STR/SS 3 The Strategy for Tudeley Village

6.1. Save Capel submits that this Policy, and the substantial contribution of this allocation to the overall Growth Strategy, is **unsound in its present form** for the following reasons;

It is **not positively prepared** because;

- . Its OAN has been based on out-of-date statistical data and has failed to reflect the Borough's constraints of green belt and flood zones in establishing its planned need.
- . Exceptional circumstances exist in the Borough which would allow a departure from the 'standard method'.
- . TWBC did not approach other LPAs, including those outside the HMA with less constraints, to establish whether they could take any 'unmet need'.
- . It has not considered truly local needs and is not 'objectively assessed'.
- . It has disregarded local public opinion expressed in responses at Regulation 18 and the 'Vision for Capel' questionnaire in the preparation of the Capel Neighbourhood Plan, which has direct bearing on the siting of new housing.
- . The Plan has not considered the cumulative impact with the local plans of neighbouring LPAs, particularly on transport & infrastructure.
- . TWBC has failed to get the support of Tonbridge & Malling who will be most affected by the increased traffic and demand for services.

It is **not justified** because;

- . A revised OAN target using the latest government statistics would result in a lower OAN and thus, less pressure on the Plan to consider development on constrained areas.
- . 'Windfall sites' are understated which has not reflected the recent changes in legislation that promotes the change of use of urban sites to residential. The strategy ignored sites with less than 10 units which should have been considered for allocation.
- . It has failed to rigorously identify all other brownfield opportunities, including those resulting from the changing need for office/retail space. In particular, post-covid changes.
- . The review of town centre regeneration (scheduled for around 2025) should be reflected in the growth strategy needs now.
- . It is not demonstrated that a garden settlement at Tudeley is the most appropriate strategy and reasonable alternatives have not been considered fully before developing this green belt.
- . The Sustainability Appraisal for Tudeley is flawed and has not been evidenced by an assessment at the 62 sub-question level.
- . The division of the settlement by the railway does not meet 'garden settlement principles'.
- . It fails to acknowledge the cumulative effect of increased transport from housing and adjacent quarry development in a balanced way. It ignores key evidence of traffic safety impacts associated with HGVs using inadequate local roads, most of which are narrow country lanes, and fails to acknowledge the issue of pollution associated with increased vehicular traffic including HGVs.

It is **not effective** because;

- . It is not evidenced by a statement of common ground with neighbouring TMBC.
- . It is relying heavily on two strategic sites (including this allocation) in unsustainable locations for delivery of its housing target which represents an unacceptable risk for the borough.
- . This allocation is proposed to deliver 150 units by 2025/2026 which is optimistic and affects the 5-year supply requirement.
- . It relies entirely on the deliverability of substantial infrastructure where the evidence base documents are inconsistent, contradictory and unrealistically optimistic.
- . The evidence does not support the extent of infrastructure interventions required to deliver sustainable development and the Infrastructure Plan does not effectively mitigate the impacts of the STR/SS 1 development and/or is commercially unviable.
- . There is no demonstrated commitment to "I" Before "E" with key community and transport infrastructure being 'medium or long-term' and a reliance on s106 funding.
- . The necessary flood mitigation and potential new sewerage treatment plant is likely to affect the developable area and the deliverability of 2,800 homes.

It is **not consistent with the NPPF**, specifically in respect of the nature of the Tudeley garden settlement and its planned development;

- . Exceptional circumstances exist in the Borough which would allow a departure from the 'standard method'. This could avoid development on this green belt.
- . The evidence presented does not support the conclusion that the site 'on balance' meets Sustainability criteria (i.e., on social, environmental and economic grounds).

- . There are “severe” traffic impacts, which have not been adequately mitigated, and the impacts of which will be social (access to services), environmental (such as road safety and air pollution), and economic (congestion will cause delays, with economic cost). The Plan does not meet the tests set out in the NPPF (para 109) and is undeliverable.
- . It has not been prepared following the guiding principle in NPPF that ‘... local people ... can produce their own [local] plans which reflects the needs and priorities of their communities.’
- . Green Belt boundaries should only be altered in ‘*exceptional circumstances*’ which are ‘*fully evidenced*’ (NPPF para 136). These proposals do not meet these requirements.
- . TWBC has not conducted a LVIA for the site nor any adequate landscape sensitivity analysis. The site should be considered as a ‘valued landscape’ within NPPF terms and of VERY HIGH value in landscape assessment terms.
- . The Plan has failed to adequately assess the impact on heritage assets and their setting, including All Saints Church with its world-renowned unique ‘Chagall windows’.
- . It does not demonstrate that the development will any way manage, conserve nor enhance biodiversity.
- . The ‘betterment’ of flood mitigation to existing properties in Five Oak Green is not substantiated and the justification for green belt removal unsound.

6.2. This Policy and its supporting evidence base have been reviewed, together with the Tudeley Delivery Strategy prepared by Hadow Estates. TWBC has confirmed that *“it is their work which is relevant to the PSLP but not produced for TWBC as an evidence base document”* but *“it is material to the allocation”*. In addition, the Strategic Sites topic paper states that this report *“has evolved through a process of engagement with TWBC”* and *“provides a clear and robust approach”*.

6.3. Whilst the level of detailed evidence required to support an allocation in the local plan is not the same as for the subsequent SPDs and a planning application, Save Capel submits that compliance with all regulations (including the NPPF) and all evidence should be tested at the Inspection stage. We strongly argue that the failure to meet any of the above would inevitably result in sufficient harm which would mean that any subsequent planning application for the site would necessarily be refused.

6.4. These arguments are explained further under the following topic areas.

Consistency with other policies

6.5. This representation acknowledges the objectives of TWBC and supports many of the policies set out in the PSLP. However, the allocation at Tudeley (STR/SS 3) directly contradicts several other policies and is inconsistent with much of the evidence base.

Policy EN4 - Historic Environment

6.6. This Policy uses terms such as “have regard, where possible, consideration” words that do not convey any surety that the Policy will safeguard our unique historic environment despite acknowledging that it is an irreplaceable asset. The sheer scale of the change of setting from rural to urban in Capel with 4000+ houses does not show “sensitivity”.

Policy EN5 - Heritage Assets

6.7. It is to be expected that TWBC abide by this policy and recognise the significant harm that the LP as it stands will cause. Housing need alone cannot be used as any justification. Given the scale of the proposals the setting of many assets will be significantly harmed.

Policy EN8 - Outdoor Lighting and Dark Skies

6.8. Light pollution is one of the most rapidly increasing types of environmental degradation. Light pollution maps enable the tracking of changes in light pollution across the country. Lights can account for between 15-30% of a council's carbon emissions.

6.9. With few exceptions, everything we build is lit at night, including homes, streets and roads, bridges, commercial buildings, parking lots, etc. Sky glow, glare and light spillage can disrupt the behaviour of flora and fauna. Year on year, artificial lighting is increasing by about 6%.

6.10. This increase will exacerbate known and possible unknown effects of light pollution on human health, environment and on the visual perception of the Universe by humans due to the location, intensity, and wavelength of the emitted light at night.

6.11. TWBC's strategy EN8 is to “maintain current level of lighting in rural areas.” The target is “no deterioration in dark skies mapping outside allocated areas.” The implication of this is that lighting

levels will not be reduced with the new development, so the density of lighting could remain the same per area of construction, but as the area grows, it could spread the light pollution more widely. Due to the openness and sloping nature of the Tudeley site, this policy is not achievable.

6.12. Light pollution will be an insurmountable issue which will affect not only residents of the development but wildlife and biodiversity assets currently thriving. If this is proposed to be mitigated by reducing lighting density throughout the settlement, this would no doubt lead to more crime as has been the case in other "Garden Settlements".

Policy EN18 - Rural Landscape

6.13. Several "roads" within Capel are included in the "Rural Lanes" Supplementary Planning Document. The proposed Five Oak Green by-pass is very significant.

6.14. Sherenden Road (No 125) will become the main road through what would be the new town of TGV and Hartlake Road (no 124) is the western boundary to this strategic site. Both are amongst the most highly scoring lanes in the borough. Hartlake Road is in the top 5% for historic value (Appendix NN 4) whilst both Sherenden and Hartlake in the top 10% for high landscape and amenity value (Appendix NN 3) 5 SPD "Rural Lanes"

6.15. Sychem Lane (no. 127), Church Lane (No 128) and Alders Road (no 126) will be adversely affected by the proposed FOG by-pass and fall within the top 10% or 20-30% historic, amenity or landscape value.

6.16. It is unclear and no evidence produced how this Policy relates or supports in any way the Strategic Sites Policies. The plans WILL result in unsympathetic change to important rural lanes. A new by-pass will undoubtedly include street lighting as will settlements themselves. As such the evidence base to support the two sites and accompanying new road infrastructure is unsound.

Landscape

6.17. The development of the proposed Tudeley Village allocation (STR/SS 3) would result in substantial harm to the landscape, harm to the High Weald AONB and its setting, and harm to the Green Belt. None of these harms have been adequately assessed by the Council.

6.18. The extent of visibility of the site from the surrounding area including the immediately adjacent AONB has not been adequately considered, but it will have a considerable effect given the wide, open, and prominent nature of the local landscape.

6.19. The policy and supporting evidence base do not justify that the allocation would meet the test of soundness. Appropriate and proportionate evidence on landscape, heritage, and other environmental implications has not been provided.

6.20. TWBC has not conducted a LVIA for the site, unlike other sites in this Plan, which is particularly damning given it is the largest allocation in the local plan. This is inconsistent with the approach taken by other LPAs in their local plans, e.g. neighbouring Tonbridge & Malling who has conducted a number of LVIA's for smaller strategic sites often with fewer 'sensitivity' issues.

6.21. TWBC has not carried out any adequate landscape sensitivity analysis which is a serious omission. Neither landscape nor ecological significance have been addressed by TWBC in any meaningful way and the proposed masterplan includes features that TWBC's own AONB setting report [14a] has identified as being particularly harmful.

6.22. Save Capel strongly argues that this site should be considered as a 'valued landscape' within NPPF terms and of VERY HIGH value in landscape assessment terms.

6.23. Save Capel also considers the susceptibility and sensitivity of the landscape of the Tudeley site to both be VERY HIGH. The tranquillity of the site and the open surrounding area including the adjacent parts of the AONB would be seriously and adversely affected by the proposed development. The AONB, its setting and the rural character of the B2017 which forms its boundary would be harmed and the overall level of harm to the Green Belt would be VERY HIGH.

6.24. Save Capel submits that the allocation at Tudeley does not accord with the NPPF, in that it fails to protect valued landscapes as required by paragraph 170 and would result in inappropriate development that would be harmful to the Green Belt, contrary to paragraphs 143 and 144.

Heritage

6.25. 7. *Require a high-quality layout and design. In particular:*

a. consideration should be given to the key landscape characteristics, views, and the setting of the High Weald Area of Outstanding Natural Beauty;

b. particular respect should be given to the setting of heritage assets, especially All Saints Church;

6.26. This strategy gives no detail as to how any impact on heritage assets and their unique settings might be mitigated. ‘Consideration’ and ‘respect’ are as meaningless as the promoter’s intention to create “*a dialogue between All Saints Church and the proposed new school opposite it*”. No evidence offered as to support “respect” or context.

6.27. All Saints Church is of particular importance. Unique HA as the only church in the world to have ALL its windows designed by Marc Chagall. Impact on the setting is significant. Significant concerns regarding the impact of crime & damage from vandalism. Measures to protect the windows (bars or mesh) would detract from their artistic integrity. Unique tranquil setting lost for ever and noise pollution from both traffic and a new population of several thousand. Paraphernalia associated with suburbia. Light pollution from a new town and damage caused by construction of town to the fabric of the building, sub surface vibration from HGVs.

6.28. **Hadlow Estates Masterplan**

“Existing buildings and Heritage Constraints

The are several existing buildings on site. Some are owned by HE. These include a collection of buildings in the centre of the site at Bank Farm. Where the estate owns the buildings, they have been included in the red line of plan of the site. Other existing buildings are in private ownership.....they will exist within or on the edge of the TV dev, and the masterplan has been designed to ensure a good interrelation between these buildings and the new development. An example of these buildings include The Old Schoolhouse (now privately owned) ...a large oasthouse on the sw boundary....” “some of these buildings are heritage assets that have been assessed as part of a wider study. The heritage constraints and opportunities across the site are well understood, and the masterplan has been developed to protect, respect and where appropriate celebrate these assets”. Page 306 Tudeley Village Delivery Plan

6.29. The words “listed building’ are missing from the delivery plan & it is not mentioned above that Bank Farm is a listed building.

6.30. Lilley Farmhouse and barn (both at the centre of the new town) Tudeley Hall and Crockhurst Farm to name a few do not warrant a mention. Where is the mentioned assessment of heritage assets “as part of a wider study”? Why is this not attached to the evidence base?

6.31. The Constraints Map on page 35 of the section entitled Masterplan has included 5 purple dots in the key to indicate listed buildings. These are owned by the Hadlow Estates. Sherenden Farmhouse and Lilley Barn are absent. On the boundary but surrounded by new housing on all three sides are Tudeley Hall and of course the G1 “All Saints Church”. To not address or even acknowledge the impact of a new town is highly questionable. (NB Lilley Barn is not individually mentioned as being listed by Historic England but TWBC states it falls under the Lilley Farmhouse listing as within its curtilage & setting.14/504358/FULL).

6.32. An assessment of the impact of a new town on the Chagall windows, as the greatest asset in the borough, should have been commissioned. As it stands the plan does not robustly demonstrate that the windows will be conserved and enhanced in any meaningful way let alone not be damaged.

6.33. Our Heritage team has produced a comprehensive report (appendix 11).

Transport & Infrastructure

6.34. TWBC has engaged David Lock Associates (“DLA”) to prepare the masterplanning of Transport & Infrastructure for the Strategic Sites in the PSLP. This includes an assessment of the necessary infrastructure for three scenarios: (1) Paddock Wood and East Capel, and Tudeley Village both going forward; (2) Paddock Wood and East Capel only (STR/SS 1); (3) Tudeley Village only (this Policy).

6.35. DLA has recommended scenario (1) and this has been included in the PSLP. This would require substantial new infrastructure to mitigate the impact of planned development which is set out in DLA’s Infrastructure Framework (section 6 of its Main Report).

6.36. Strategic risks would arise in the deliverability of the PSLP as the development of Tudeley village is dependent on the funding of much of the essential infrastructure being shared with the delivery of Paddock Wood and East Capel (STR/SS 1). This is unusual and, when viewed as a planning application, would likely be considered as not “effective” and not “viable”.

6.37. Given the scale of the proposed developments and new infrastructure required, Save Capel has engaged Motion Consultants Ltd (“Motion”) to provide an independent expert review. Motion’s report is an important part of this representation and can be found as Appendix 1.

Road Infrastructure

6.38. The site is isolated and the B2017 is the only highway access to and from Tudeley Village. It is also the main vehicular connection between East Capel / Paddock Wood and Tonbridge. The route is currently signed as unsuitable for HGV traffic and is inadequate to accommodate two-way bus movements due to its rural nature. The approach to the A26 junction is already approaching the absolute capacity of a road of this nature. During peak periods, extensive queueing can already be observed on its approaches and also at the Hartlake Road / B2017 approach.

6.39. This is in part acknowledged by DLA in the Plan and items are included for:

- . Highway improvements to the A26/B2017 roundabout (£1.5M);
- . Widening of B2017 – SE corner of Tudeley Village to A26 (£3.1M); and
- . Five Oak Green (FOG) Bypass (£8.86M).

6.40. Motion has determined that these mitigations are totally inadequate and fail to provide the necessary width and alignment improvements. In order to maintain the current performance of junctions on the B2017 and, in particular, the B2017 / A26 roundabout, the available carriageway space will need to be doubled. This would mean providing 2 traffic lanes in each direction on the B2017 and potentially the same on the A26.

6.41. Furthermore, the B2017 is unsuitable for use by commercial construction vehicles and Hartlake Road has a 7.5tonne weight restriction. Therefore, some width and alignment improvements will be required prior to commencing any work on site in order to provide a safe and suitable route for construction traffic to access Tudeley Village.

6.42. The FOG by-pass would meet the B2017 at a major new roundabout junction immediately adjacent to Capel Primary School. No preliminary assessment is presented setting out the potential adverse health impacts affecting primary age children as a consequence of increased traffic volumes (including air quality, noise and road safety).

6.43. It crosses ancient woodland and the Alder Stream, where the land either side is identified as being in Flood Zone 3. No preliminary flood risk assessment has been presented to understand the extent of works required to satisfactorily achieve this or that there is an acceptable and deliverable solution in principle. It is also wholly reliant on the A228 Colts Hill Bypass being delivered.

6.44. Motion considers that the physical and environmental constraints associated with delivering a FOG bypass on the alignment suggested are so great, that the road has little prospect of being delivered and no prospect of it being delivered in the absence of the A228 Colts Hill Bypass being delivered.

6.45. The proposed severance of Hartlake Road would result in even more traffic travelling along the B2017 corridor and on the A228 and A26. No assessment has been made of the acceptability nor mitigation identified to address this increase in traffic volumes on the B2017, A228 or A26.

6.46. Motion’s conclusion regarding proposed mitigation for Hartlake Road is that it has no prospect of being delivered. Even in the unlikely event that the scheme is delivered, it would simply push the impacts to other locations in the road network where no infrastructure interventions have been identified to mitigate it.

Sustainable transport

6.47. In seeking to meet the sustainability requirements of garden settlement principles (and the NPPF) the Tudeley proposal relies heavily on cycle routes to Tonbridge (route D in the ‘PJA Study’) and to Paddock Wood (route E). Route D is almost entirely not overlooked which has an adverse impact on the perception of personal safety especially during darker months of the year. Route E is predominantly on narrow, rural lanes sections (up to 60mph speed limits) of which are too narrow for two-way vehicle movements. The safety of cyclists would be entirely reliant on vehicle drivers seeing them and taking

appropriate action and the assessment has taken no account of the potential significant increase in traffic volumes on these roads arising from the Strategic Sites.

6.48. The PJA study has specified that lighting to highway standards will be provided along the routes, when such a planning application in rural lanes and open countryside has no prospect of being approved.

6.49. Motion considers that the proposed cycle mitigations fail to deliver safe and suitable routes that would be attractive for functional journeys. Very few, if any, functional journeys can therefore be expected to be made on foot or by cycle.

6.50. The bus public transport strategy formulated to support the allocation is hopelessly inadequate because it either does not exist or else would cater for only a fraction of the forecast demand.

6.51. There is no prospect of a railway station at Tudeley Village and neither Tonbridge railway station nor Paddock Wood railway station is within reasonable walking distance. For the reasons set out above, the majority of connecting journeys to / from Tudeley Village from / to the railway stations can therefore be expected to be made by private car either as driver or as passenger. Both railway stations are located centrally which is inconvenient for connecting journeys by car. Both have limited car parking availability and both charge for car parking.

6.52. As a consequence, travel by rail would be an unattractive mode choice for people travelling to or from Tudeley Village and therefore few journeys to be made by rail as the main mode. Moreover, even if rail is chosen as main mode for a journey, it is likely to require a connecting journey by car adding to the significant increase in road traffic on the B2017.

Summary

6.53. The TWBC transport evidence base has significant inconsistencies between reports which claim to be assessing the same matters (see Motion report paragraphs 8.7 to 8.10). The consequence of this is that the total change in road traffic arising from the 3 Allocations (in Paddock Wood, East Capel and Tudeley Village) is not clear.

6.54. Motion considers that the true impact of road traffic arising from the 3 Allocations is significantly under-estimated because the mode shift assumptions are inconsistent and either selectively or incorrectly applied.

6.55. Therefore, the proposed significant infrastructure interventions which are fundamental to the delivery of the 3 Allocations either do not effectively mitigate the impacts of the 3 Allocations and / or are commercially unviable.

6.56. The differences in the timing and allocation of infrastructure between the Masterplanning Report, the Stantec Study and the Sweco Study and the Viability Assessment are so great as to render the Viability Assessment otiose.

6.57. The proposed phasing and delivery of these allocations is not “effective” in soundness terms because the funding of “Infrastructure” before “Expansion” is not justified in the Plan. Several pre-occupation mitigations are considered necessary by Motion, which have not been appropriately phased in the Infrastructure Plan:

- . The B2017 would require significant width and alignment improvements prior to the commencement of work on site in order to provide a safe and suitable route for construction traffic to access Tudeley Village.
- . The FOG Bypass would be required. This is because the B2017 is unsuitable to safely accommodate increases in road traffic especially heavy vehicles such as pantechnicons;
- . The FOG Bypass is reliant on delivery of the A228 Colts Hill Bypass which would therefore need to be delivered in parallel with the FOG Bypass. The A228 Colts Hill Bypass would be required any way because the road in its current format cannot safely accommodate increases in road traffic;
- . The complete network of pedestrian and cycle routes and improvements will be required. This is because pedestrian and cycle infrastructure currently does not exist connecting the 3 Allocations to adjacent settlements; and
- . A comprehensive network of bus routes will be required. This is because the current bus provision fails to cater for the demands arising from strategic development.

6.58. In order to deliver this necessary infrastructure in a timely manner, Motion considers that it will need to be advance funded by the public purse. There is no mechanism identified in the evidence

base to explain how this will be achieved. Nor is there a commitment by TWBC that the public purse will be made available to cover the shortfall in infrastructure funding early in the Plan period.

6.59. Motion concludes that as proposed, the proposed residential allocations at Tudeley Village, East Capel and Paddock Wood, either in isolation or cumulatively, will result in:

- . Cumulative residual impacts on the road network which are severe; and
- . Unacceptable impacts on highway safety.

6.60. These are the tests set out in paragraph 109 of the NPPF for refusing planning permission for a development. As a consequence, there is no prospect of planning permission being granted for development at Tudeley Village, East Capel and / or Paddock Wood.

6.61. The proposed development of Tudeley village should therefore be removed from the Local Plan as it is not effective in terms of soundness and is **undeliverable**.

Biodiversity

Fauna & flora

6.62. Endangered species are present within the Capel sites, including EU protected species (Great Crested Newts, Dormice, Bats and Badgers).

6.63. Kent Ornithological Society Records confirm 70 species of birds rely upon the Tudeley site alone; 12 Species of Principal Importance and 10 on the Red List of Conservation Concern, which have suffered significant population decline as a result of habitat loss.

6.64. Habitat loss: the proposals can only exacerbate the decline through removal of suitable habitat for field and ground-nesting birds, which will be squeezed in all directions by the developments and gravel excavations.

6.65. Four species of owl also occur in the area (Tawny, Little, Barn, Long-eared), an unusually diverse number and any loss is a serious conservation concern.

6.66. Two White Stork in Tudeley are likely to originate from a reintroduction project at the Knepp Estate, West Sussex. Care needs to be taken to ensure they are not disturbed by hasty development practices.

6.67. All of these species should be taken into consideration by a public body performing its functions with a view to conserving biodiversity. However, there is little in the Local Plan to confirm mitigation measures beyond a 'wetlands park' in East Capel and HE's vague promises.

6.68. Hedgerows are roadways and homes for wildlife, including Dormice, but the creation of large housing estates will see a decrease; the Tudeley proposals remove hedgerows or segment them, making them redundant as effective corridors and breeding stations.

6.69. Rare plants include the Greater Butterfly Orchid and the True Fox Sedge (both are on the Vascular Plant Red Data List for Great Britain).

Domestic pets

6.70. Ownership: pre-pandemic 26% of the population owned a cat, 24% a dog; this has increased by 11%. (4,800 homes = 1,500 cats/1,400 dogs).

6.71. Off-lead dogs disturb ground-nesting birds and dog faeces over-enrich soil, encouraging plants like nettles, which outgrow specialist fauna.

6.72. The Mammal Society estimates UK cats catch 275 million prey a year; 27 million are birds but wild mammals, reptiles and amphibians are also killed in large numbers.

6.73. A cat roams a distance of between 100m to 3km. This brings the RSPB reserve at Tudeley Woods and the rich Medway flood zone into the feline hunting zone. The impact on wildlife of cats will be devastating.

TUDELEY – Hadlow Estate (HE) Masterplan / Delivery Strategy

6.74. HE focusses on the site in isolation, with no clarity on how green corridors and wildlife movement link beyond the site or how the site interacts in the wider context. This is true for Heritage, Landscape and Visual settings.

6.75. Green corridors within the site will be segmented – this cannot benefit wildlife. Nor can the removal of orchards and paddocks, although the report curiously claims HE will improve them.

6.76. Irreplaceable ancient woodland is vulnerable to irreparable harm. The central ancient woodland is next to the urban hub and effectively surrounded by development.

6.77. No firm indication of how biodiversity net gain is to be achieved beyond boxes (bird, bat, bees, etc). All else, like new hedgerows in AONB and a wetland habitat are aspirational.

6.78. HE refers to 3 key objectives;

- Green Belt 'compensatory improvements': equated to planting hedges and management of habitat – hardly adequate for the MGB loss which will result in the merger of Tudeley with Five Oak Green.
- Address impact on views to/from AONB: the ancient and irreplaceable landscape will be forever irreparably scarred, physically and visually.
- Biodiversity net gain of 10 percent: plans are speculative, 25 years distant, dependent upon TVG approval and described as not required.

6.79. HE claims there are numerous assessments, but none are open to scrutiny.

6.80. Improving features for biodiversity is dependent upon achieving planning permission for the site. No reason is given for this dependency, despite HE claims of long-term wildlife stewardship.

6.81. HE has no mandatory need to protect habitat as the site is not in or close to '*...any statutory or non-statutory wildlife site designation.*' However, the proposed Five Oak Green by-pass necessitated by this strategic site will cross land that that is "Priority Habitat Inventory (traditional orchards)" and "Priority Species for Countryside Stewardship Targeting –Lapwing" (DEFRA).

6.82. Given HE's caveats, and TWBC has no governance measures in place to ensure biodiversity net gain, there appears no real commitment or incentive to assist biodiversity and replace lost habitat.

Summary

6.83. Policy EN9 recognises that important habitats and protected and notable species are not confined to designated sites but can be found on any site (Page 356 PSLP). The evidence gathered above supports and endorses this fact. However, the plan does not demonstrate that the strategic sites will any way manage, conserve nor enhance biodiversity. At best the proposals are aspirational at worst destructive.

6.84. It is considered by Save Capel that the non-inclusion of the Hadlow Village Masterplan and Delivery Plan in the TWBC evidence base is not justified and will lead to both a flawed consultation and Examination and therefore fails the test of soundness. Furthermore, the plan because of lack of evidence does not robustly demonstrate that it is effective.

6.85. Our research team has prepared a comprehensive report on biodiversity (appendix 12).

Flood risk, water supply, & sewerage

6.86. Whilst we acknowledge the SFRA commissioned by TWBC (JBA 2019), the strict application of flood zone boundaries determined that a Level 2 is not required for the allocation at Tudeley (STR/SS 3). The proposals include development right up to the flood zone.

6.87. The draft local plan recognised "Flood Zones 2 and 3 in northern part of Tudeley". It is well known that many parts of this proposed garden settlement are regularly subjected to flooding, as demonstrated in the report prepared by our research team at Regulation 18 (see appendix 13).

6.88. The elevated southern parcel (south of the railway) of the site does not directly benefit from the strategic storage at Leigh, given that the existing flooding here is from run-off from higher ground to the south, surface water, and watercourses that are downstream.

6.89. Given the sloping nature of this terrain (>60m AoD to c20m AoD), the development would result in vast amounts of run-off that will descend towards the railway and eastwards across the Sherenden Road area. The railway embankment already acts as a buffer, particularly in the north-east.

6.90. Large areas of the northern parcel are already subject to risk from fluvial flooding of the Medway and, whilst the increased capacity at Leigh would provide some strategic mitigation, a repeated breach would cause increased flood levels compared to the major events in 2000 and 2013.

6.91. A drainage plan has not been included in the evidence base although it is clear that extensive mitigation will be needed, and the location of surface water attenuation storage and other forms of SuDS will impact the masterplan in terms of developable area, building design/cost and access.

6.92. Save Capel submits that the Policy is not “effective” as the subsequent FRA and prescribed drainage measures will limit the developable area, resulting in 2,800 homes not being deliverable. In addition, the location of the proposed main village centre and primary school is subject to frequent flooding from the main conveyance channel in the southern parcel. This is ‘high risk’ in EA surface water mapping.

6.93. The Policy includes *“mitigation measures to reduce the flood risk to particular residential areas in Five Oak Green”*. Development of this allocation would not directly influence the causes of flooding in FOG and such measures have not been specified. A Five Oak Green flood alleviation scheme has been proposed with the EA to reduce fluvial flood risk from the Alder Stream, but this has not been included in the PSLP. The ‘betterment’ is therefore not justified, and the Policy is unsound.

Water supply

6.94. South East Water (SEW) supply the Capel/Paddock Wood area (WRZ7) from Trottiscliffe and the surrounding areas (from groundwater) where it is treated. The same sources will be used in the future and forecasts for WRZ7 show there would be a deficit in the amount of water available to supply the growing demand by 2030.

6.95. A system of private water mains belonging to Hadlow Estates (the promoter of Tudeley village) also provides supply to some properties around the area of the development.

6.96. Although there is some capacity already in SEW's plans to serve the proposed Tudeley garden settlement, it is considered that it may require an adaption or expansion of the existing mains. This is in addition to the laying of new mains within the residential area.

6.97. The EA has applied a Groundwater Protection Zone (SPZ3) related to the aquifer at Hartlake which extends under almost all the parcel north of the railway line. Any further development of this area may impact water supply options that serve SEW customers in Pembury and Tunbridge Wells:

. Hartlake Wells pump Lilley Farm Paddock Wood reservoir Pembury/TW customers

6.98. SEW has carried out extensive investigations into eight groundwater sources, and within its Water Industry National Environment Programme (WINEP) report it identifies concerns of raw water quality deterioration from significant levels of nitrate and pesticides, metaldehyde and carbendazim.

6.99. The Hartlake catchment is already at risk from nitrate and pesticides and the investigation found a significant relationship between groundwater levels in the river terrace gravels at the Hartlake site and River Medway levels and flows. Metaldehyde has been applied to the nearby neighbouring agricultural land surrounding the abstraction and high levels of metaldehyde concentrations have also been found in the River Medway.

6.100. Polluted run-off from the proposed development in both construction and general household chemicals will find its way into groundwater and aquifer/streams without extensive SuDS filtration, and indeed as a result of any breach or failure of these measures.

6.101. The potential environmental issues around the Hartlake Aquifers and, with rising nitrate and pesticide levels that have already been identified, any penetration to the Aquifers would lead to further significant health risks.

6.102. The Aquifer and natural springs within the site will seriously hinder excavations for building, sewage, drainage, etc. as suitable mitigation schemes will have to be implemented to avoid puncturing the natural clay membrane that protects the Aquifer.

6.103. Again, Save Capel submits this is an inappropriate location for development, in particular the northern parcel, and is not “effective” and therefore unsound.

Sewerage

6.104. Southern Water (SW) will be carrying out further capacity assessments at both the existing Paddock Wood and Tonbridge treatment works to assess capacity to meet the future needs of all the proposed developments in Capel parish, most notably at Tudeley.

6.105. Given the constraints at Paddock Wood, explained at STR/SS 1 above, and already increasing demands on the Tonbridge sewerage plant (distant and uphill), there is a very real likelihood that a

new additional treatment plant will be required at Tudeley. The promoter has told Save Capel that land would be available for this, but it is not identified in the masterplan.

6.106. Whilst the provision of sewerage facilities has not been specified, the consequent run-off to the Medway floodplain from new plant would further add to flooding risk and adequate/enhanced mitigation from SuDS and other measures must be incorporated in the build design.

6.107. It is inappropriate that such a significant element of infrastructure has not been specified nor assessed prior to this consultation. Given the significance, the evidence does not demonstrate that this Policy can be effective in delivering 2,800 homes.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Save Capel has sought to be actively involved in engaging with the Council throughout this review of the Local Plan. As a group we have developed particular expertise and have undertaken significant and extensive research in respect of the effects of the policies to which we have made representations. We consider that we will be able to assist the Inspector(s) examining the final submission significantly.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Sustainability Appraisal for Tudeley Village & Paddock Wood / East Capel

2.36. The Sustainability Appraisal of each site is based on 19 sustainability objectives ("SO"). Each objective is supported by 2-5 detailed and specific decision-aiding questions. In total there are 62 sub-questions based on a mix of subjective and objective criteria.

2.37. Working through these granular 62 sub-questions should result in a reasonably objective and transparent Sustainability Appraisal for each site.

2.38. There are two separate Sustainability Appraisals published for Tudeley Village and Paddock Wood / East Capel. Both are high-level assessments at the 19 strategic objective level – there is no link to nor any evidence of an assessment at the 62 sub-question level for either site!

2.39. Validating the Sustainability Appraisals for Tudeley Village and Paddock Wood / East Capel and considering the 62 sub-questions yields a fundamentally different outcome to TWBC's proposal in both cases: TWBC results appear to be entirely unreasonable and unsound.

[TWBC: for table, please see full representation attached as a supporting document]

2.40. For Tudeley Village - in summary at the 19 SO level (also see table above):

TWBC proposes 10 positive, 3 neutral and 6 negative scores

A bottom-up assessment reveals 4 positive, 1 neutral and 14 negative scores

2.41. For Paddock Wood / East Capel - in summary at the 19 SO level (also see table above):

TWBC proposes 10 positive, 3 neutral and 6 negative scores

A bottom-up assessment reveals 3 positive, 3 neutral and 13 negative scores (for East Capel only)

2.42. We respectfully submit that TWBC's assessment of both sites is flawed, illogical and not defensible

when assessing the underlying criteria.

2.43. On a side note: It is curious that in TWBC's assessment both sites are rated with near identical scores across all criteria. While this is possible in theory, it is - given the differences between both sites - statistically-speaking highly unlikely. We cannot prove and only speculate on whether this is indicative of a pre-determined answer being approved due to its convenience. However, we can unequivocally state that TWBC's assessment of both sites is superficial and simply wrong.

2.44. For a more detailed comparison and an evidence-based rationale for each score at the 62 sub-question level please refer to the 'Alternative Sites Report' in Appendix 8.

Sustainability Appraisal for Alternative Selected Sites

2.45. As mentioned under 2.22, TWBC considered several other strategic sites that – in our view mistakenly – were ruled out earlier in the plan-making process.

2.46. As a result, TWBC did not conduct a sustainability appraisal for any of these sites. There are no published sustainability results, neither at the 19 SO nor at the 62 sub-questions level for any site.

2.47. Given the flawed assessment and poor sustainability scores for Tudeley Village and East Capel, Save Capel decided to reinvestigate these sites as potential alternatives.

2.48. Given Save Capel's limited resources we decided to focus on 2 specific sites – Castle Hill (also located in Capel Parish) and Blantyre House.

2.49. In summary at the 19 SO level (see table below):

A bottom-up assessment for Castle Hill reveals 7 positive, 7 neutral and 5 negative scores

A bottom-up assessment for Blantyre House reveals 8 positive, 6 neutral and 5 negative scores

2.50. A comparison to Tudeley Village and East Capel reveals that both alternative sites are far more sustainable and preferable. Castle Hill in particular feels like a – more sustainable – direct replacement for Tudeley Village.

2.51. We also strongly suspect that some of the other strategic sites such as Horsmonden would also turn out to be more sustainable than Tudeley Village and / or East Capel if subjected to a detailed, objective review. Unfortunately, this was not conducted by TWBC and Save Capel does not have the resources to replicate the analysis for all sites in time for Regulation 19.

2.52. For the assessment and an evidence-based rationale for each score at the 62 sub-question level for Castle Hill and Blantyre House please refer to the 'Alternative Sites' report in Appendix 8.

[TWBC: for table, please see full representation attached as a supporting document]

2.53. Key findings from Save Capel's 'Alternative Sites' report are:

The Sustainability Appraisals for Tudeley Village and East Capel are unreasonable based on TWBC's own criteria and any objective assessment

The Sustainability Appraisals for Tudeley Village and East Capel are inconsistent with the assessments of other SHELAA/strategic sites

Both Castle Hill and Blantyre House are more sustainable sites offering a similar housing potential as Tudeley Village / East Capel

Of the 437 unique sites submitted for inclusion in the SHELAA process, 323 sites were rejected by TWBC.

Based on a review of 90 rejected sites in 3 representative parishes, we recommend to re-consider 43 'rejected' sites for inclusion in the Plan INSTEAD of Tudeley Village / East Capel.

These 43 sites provide a total incremental housing potential of ca. 2,270 units (based on a conservative 30 dph). All are more sustainable than Tudeley Village / East Capel.

An analysis of 7 selected high potential sites reveals a potential housing yield of up to 10,000 dwellings through the use of alternative housing solutions.

If you would like to attach a file in support of your comments, please upload it here.

[PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-1 Cover Letter.pdf](#)

If you would like to attach a file in support of your comments, please upload it here.

[PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-2 Representation.pdf](#)

If you would like to attach a file in support of your comments, please upload it here.

[PSLP 1964 & 1973-1987 Knights Solicitors for Save Capel SI-3 Appendices.pdf](#)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Scott [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	David Scott [REDACTED]
Comment ID	PSLP_1667
Response Date	04/06/21 13:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	David Scott
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

- Do you consider that the Local Plan is not sound because:
- . It is not positively prepared
 - . It is not effective
 - . It is not justified
 - . It is not consistent with national policy

Question 5

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I consider the local plan to be unsound because:

- . The percentage of new houses in Tudeley and Capel is disproportionate with the plan across the wards covered by TWBC. A more widespread, smaller set of new builds across all wards would minimise the impact on the infrastructure and environment in one.
- . There are already considerable infrastructure challenges in the area, and the plan does not comprehensively answer. The current situation is that the roads in and out of Tonbridge from Tudeley and Capel are extremely congested, both during school drop off times and weekends, with some journeys for the 3 mile journey into Tonbridge taking more than 20 minutes. Train services from Tonbridge are already crowded during commuting times, with no seating available for the 40 minute journey several times a month. With an extra 2,800 dwellings there will obviously be a significant increase in traffic in to Tonbridge from the B2017, lengthening journey times even more. There will be a need for additional parking close to Tonbridge station, and additional train capacity to cater for the number of new commuters. Without a comprehensive plan as to how these basic transport infrastructure needs can be met with the involvement of the Sevenoaks District Council and Tonbridge & Malling Borough Councils the local plan is not positively prepared.
- . While the plan recognises that "A key issue is therefore ensuring that the proposed growth strategy can be accommodated without further harm and risk to areas that are vulnerable to flooding, to provide betterment", the local plan does not provide solution as to how that issue will be managed in the Tudeley village development. The land around Hartlake road already suffers from flooding and as large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change I can only believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. The plan refers to Sustainable Drainage Systems, but not identify how these will be improved, or the impact of doing so, to alleviate the existing problem let alone cater for a new development.
- . Green belt land is that it is designed to provide a buffer between towns, with tightly controlled developments that incentivises regeneration of damaged and derelict land in urban areas; has all such land been properly considered in the creation of the plan? Green belts are meant to be cherished, conserving nature and agriculture. Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter Scrimshaw [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter Scrimshaw [REDACTED]
Comment ID	PSLP_858
Response Date	01/06/21 18:05
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Peter Scrimshaw
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived on Badsell Road for ~25 years and now work from home, so I am very well placed to comment on how these proposals will affect the local area. Other than the outrageous and unjustifiable destruction of green belt land, I am very concerned about how traffic levels will change on what are some quite minor roads and the inevitable increase to the flood risk in this area. There have been several recent flood events in Five Oak Green village, with water levels reaching halfway up my driveway, so these are not rare events already!

Building a new garden village at Tudeley along the B2017 (basically a country lane) is frankly preposterous, as the vast majority of new residents will need to drive from there; parking at either Paddock Wood or Tonbridge railway stations will be totally impossible, if not already. Even if a new station were to be built at Tudeley, fast trains to London would be very unlikely to stop there anyway, since they already stop at both of the stations that would be on either side of it!

I am also very concerned that this idea would eventually result in a continuous corridor of urban sprawl, from Tonbridge, through Tudeley and Five Oak Green to Paddock Wood, completely destroying the green belt buffer around Tonbridge.

Large parts of the developments will occur on the River Medway floodplain with flood risk assessments based on old data that does not fully consider the impact of climate change. Flood mitigation measures may help, but I believe that flood risks will increase. Covering farmed fields with houses and roads will make the Medway flood more often and cause increased flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. There will be an increase in air, light and noise pollution that will spread across the boundary into Tonbridge & Malling and create a visual scar across the landscape. Views from Tonbridge to the Low and High Weald will be impaired, including the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may end up being surrounded by houses, bus lanes and sit next to a busy road, which will cause great harm to its value as a heritage asset of world renown (due to the complete set of Marc Chagall windows).

The proposal at Tudeley can never be one village, as it is divided by a railway line that has very narrow, weak crossings. Putting in larger crossings at frequent points across the railway may be possible but it won't tie the two halves together well enough to make it one settlement, so it will never satisfy the garden village principles.

I see that there is also now a plan to add a spur road from the resurrected Colts Hill bypass, around Five Oak Green village, which will of course destroy yet more green belt land. If you now acknowledge that you will need to bypass the village, then perhaps that should be taken as a fairly obvious clue that the proposal is inappropriate to the area? At the very least you will need to wait and re-assess local traffic flow in the area after all of the current new housing around Paddock Wood is finished and fully occupied.

I am also staggered by the council's outrageous hypocrisy, by proposing to build on green belt land at all, with other local planning applications often turned down for "inappropriate and harmful development which would have a greater impact on the openness of the Metropolitan Green Belt", for example 18/01767/FULL (Erection of building for six B&B rooms associated with The Poacher, Tudeley) and 18/03915/FULL (Demolition of existing buildings and erection of detached dwelling at Builders Yard, Five Oak Green).

I do appreciate that there is an obligation to plan for future housing needs, but sincerely urge you to re-assess all available brownfield sites and come up with a sensible plan which is appropriate to the area, rather than try to dump ~50% of the requirement in one area. Being able to deal with a single landowner is not any kind of justification for the destruction of such a large area of green belt land and the location is rather inappropriate anyway, being on the River Medway flood plain and right on the boundary with Tonbridge & Malling Borough Council.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Re-assess all available brownfield sites and especially give serious consideration to the proposed development plan for Castle Hill (still within Capel), which has good road access directly onto the recently upgraded A21 and also close proximity to rail transport at High Brooms station

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Shipbourne Parish Council
Address	[REDACTED] Ightham [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Shipbourne Parish Council (Parish Clerk - [REDACTED])
Comment ID	PSLP_174
Response Date	17/05/21 16:39
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Shipbourne Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph Numbers 5.153-5.193 & 5.200-5.229

Map Numbers 26-29, 31-34 and Inset Maps 4,7,8,9

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective
	. It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

- 1 The Allocations at Paddock Wood, Capel/Tudeley are unsound because it is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- 2 The main service areas for these developments are either Paddock Wood or Tonbridge. Most of the Tudeley development will look to Tonbridge as their main service centre which is within the Borough of Tonbridge and Malling.
- 3 The following will impact on Shipbourne residents:
- The capacity of the railway station

This is currently Shipbourne's nearest mainline station to London that provides a fast and regular service; Capel and Tudeley new residents will use Tonbridge rather than Paddock Wood due to proximity. Congestion around the railway station, parking issues and capacity of the rail system are issues that should have been discussed with South Eastern Railways and Tonbridge and Malling BC as part of the Duty to Cooperate. Have these conversations been undertaken and if so what were the outcomes?

. **Increase the existing problems of air pollution within Tonbridge High Street**
Tonbridge and Malling has proposed allocations at the southern end of Tonbridge which if included in the next Local Plan will already put the High Street under undue pressure in relation to air quality. Air quality in Tonbridge High Street is of interest to Shipbourne residents as secondary children pass through the High Street on a regular basis to access the secondary schools. It is also the nearest large service centre for Shipbourne residents. Has Tonbridge and Malling Borough Council discussed the problems of air quality with Tunbridge Wells BC as part of the Duty to Cooperate? If so what are the actions that Tunbridge Wells BC propose to undertake to ensure that Tonbridge High Street is protected from increase in poor air quality caused by increase in traffic from Tudeley and Capel allocations? The SA indicates that the Capel/Tudeley allocation would create 'a worsening of the AQMA on Tonbridge High Street must be considered (cross boundary impacts)'.(Page 93)

Impact on the number of secondary school places available and opportunities for adult education for Shipbourne residents.

Has the school provision been part of the discussion with Tonbridge and Malling Borough Council as part of the duty to cooperate? The Comprehensive school at Paddock Wood is already oversubscribed.

If so what provision will be made for the education of Tunbridge Wells's children? When will the proposed secondary school at Tudeley be built and commissioned in relation to the build out of the development? Will there be restrictions on the entry into Tonbridge schools from Tunbridge Wells? The Schools serving Tonbridge and Malling already accept children travelling into Tonbridge from outside the Borough. The SA states 'All new educational pressures created are expected to be met by provision of new or extended schools. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells would continue to meet this demand.'

i) How, where and when is the secondary school provision to be made in relation to the programming of development?

ii) It is likely that the Adult education provision in Tonbridge would be used in preference to Tunbridge Wells' provision due to proximity.

Impact on Tonbridge and Malling from flashy run off into the flood plain of the River Medway

This will be exacerbated as climate change impacts increase. Flooding in Tonbridge High Street impacts on residents of Shipbourne as it is their main service centre and most of the secondary pupils need to pass through Tonbridge to reach their schools. The economic impact of major flooding within the Borough of Tonbridge and Malling as a result of allocations impacting on flash run off into the Medway could be major unless correct flood prevention methods are undertaken in the Medway valley which will address the situation. When and how will this be done in relation to the build out of the new developments? Will SUDS in the new developments at Capel and Tudeley be sufficient alone? The impact of flood waters downstream of Tonbridge (within Tonbridge and Malling), back up of flood waters into Tonbridge town centre and downstream flooding at Yalding has not been properly assessed or talked about in the Local Plan. There is no evidence that this has been sufficiently addressed with Tonbridge and Malling Borough Council and the Environment Agency as part of the Duty to Co-operate.

1 Conclusion :

None of the above issues have been addressed sufficiently in the Sustainability Appraisal or through the Duty to Cooperate with Tonbridge and Malling Borough Council. Issues have been left for consideration subsequent to the adoption of the Local Plan. This is unacceptable. The issues raised above should be identified in the Local Plan and unless they can be satisfactorily addressed with programmed actions set out in policies within the Local Plan it is considered that the plan is unsound. Furthermore it is considered that unless these issues have been fully considered and discussed with TMBC under the duty to co-operate (DTC) and there is a statement of common ground addressing these issues that the Local Plan fails on its DTC.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Actions needed to be addressed to make the plan sound:

The issues raised above should be identified in the Local Plan and unless they can be satisfactorily addressed with programmed actions related to the build out of development which are set out in policies within the Local Plan it is considered that the plan is unsound.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Rachel Smith [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rachel Smith [REDACTED]
Comment ID	PSLP_1706
Response Date	04/06/21 16:15
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Rachel Smith
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I have lived in Paddock Wood for over 30 years and am acutely aware of issues that affect the local area as result of development.

There is already congestion on the local roads, especially en route through Capel to Tonbridge, and the B2017 at the green in Five Oak Green is particularly difficult to negotiate due to on road parking and volume of traffic. The proposal to create a new settlement, 'Tudeley Village', will increase the number of vehicles in the local area phenomenally, causing horrendous additional congestion on roads that were not designed to accommodate large volumes of traffic and there would be significant detriment to the air quality from vehicle emissions. This would be further exacerbated if the proposals for more quarrying in Capel Parish go ahead with not only lorries and other large vehicles from construction sites but also the long-term activity of heavy vehicles engaged in the movement of sand and gravel. In my opinion the infrastructure cannot cope with this and local roads will be wrecked!!!

Capel parish has suffered from flooding and a massive increase in the number of homes will exacerbate this problem dreadfully.

The building of 2800 homes in a parish that contains less than 1000 dwellings is grossly disproportionate. The area is Green Belt land specifically set aside for preventing urban sprawl and protecting the rural environment between existing conurbations. I understand that the Inspector's comments on the Site Allocation Local Plan 2016 referred to not accepting a need to allocate any land within Green Belt for development. Adding so much housing in Capel Parish will result in the destruction of woodland, hedgerows, meadows, and farmland that should be maintained. It will spoil the landscape and kill wildlife when we should be protecting our environment and its precious biodiversity for future generations. This area should remain rural with agricultural land that can be used to provide food.

Brownfield sites and alternative locations within the borough should be developed and full use of the existing housing stock (ie occupation of ensure vacant properties) before Green Belt land is lost forever. With the increase in working from home the conversion of vacant office space to dwellings should be considered. Surely it would be more appropriate to focus on regenerating Tunbridge Wells town centre before destroying the beautiful countryside of Capel Parish. It cannot be appropriate that Tunbridge Wells BC expect to put more than 50% of new homes for the borough into only one of its 20 wards. I therefore feel that the proposal for a new settlement (Tudeley Village) is NOT justified!!!

Tunbridge Wells BC do not appear to have addressed the concerns and objections raised by residents and responders to the Regulation 18 consultation in relation to the extent of housing proposed for Capel Parish.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Claire Songhurst [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Claire Songhurst [REDACTED]
Comment ID	PSLP_59
Response Date	25/04/21 18:13
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Claire Songhurst
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3: The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

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Having grown up in Tonbridge, I have lived in Five Oak Green for 27 years with my husband and we raised our two daughters here. Not only is it a wonderful, caring community, but its proximity to countryside and walks makes it a wonderful place in which to live.

For me, part of the beauty of driving out of Tonbridge towards Five Oak Green are the fabulous views over fields and farmland towards Hadlow, the very fields that would disappear if this development went ahead.

The land designated for the Tudeley village is part of the flood plain. Many residents in Five Oak Green have been victim of flooding (last flood February 2020), and have had to move out of their homes whilst they were repaired. Building on the flood plain will only make the situation worse and more frequent. Whenever we have substantial rain, the sewers in the village cannot cope and pumping lorries are required to try to prevent floods and damage to properties and gardens.

Building the Tudeley garden village would effectively mean that Tonbridge/Tudeley/Five Oak Green/Paddock Wood becomes one large urban sprawl and will totally change the character of all these areas. The traffic flow is always congested going into Tonbridge and Tunbridge Wells and this would be exacerbated by these developments and the public transport infrastructure is not equipped to cope with the rise in demand.

The plans, along with those for East Capel mean that half of the housing needs of Tunbridge Wells borough would be built in this parish of 913 homes.

There is a huge campaign against these proposals and I do not feel that Tunbridge Wells Borough Council have listened to its residents (the people they are supposed to represent) and the many comments and objections made during Reg 18.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
--	---

Comment

Consultee	Richard Songhurst [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Richard Songhurst [REDACTED]
Comment ID	PSLP_607
Response Date	31/05/21 18:25
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Richard Songhurst resident Five Oak Green
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Five Oak Green with my family for the past 26 years and have been very happy due to the friendliness and community spirit generated by the whole mix of population number and closeness to both town and country. However, it has slowly been getting busier over time especially the road on which we have lived over this time and I feel that this massive increase in population levels can only make it a lot less attractive place to live. Already there are shortages of school places, doctors, dentists and other amenities for only the slight increase of people.

Another reason I object to such a vast increase in houses and people is the fact that the whole area already has serious flooding issues when we have heavy rain and many of these new houses are planned on the flood plain. Also, we frequently have sewerage problems in the village due to the size and poor condition of the infrastructure.

We really enjoy walking through the countryside and seeing all the varied wildlife around our village which is supposed to be protected by the green belt presently and so I am not sure how TWBC can build on this land.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
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Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	South East Water
Address	Rocfort Road SNODLAND ME6 5AH
Event Name	Pre-Submission Local Plan
Comment by	South East Water [REDACTED]
Comment ID	PSLP_1587
Response Date	04/06/21 14:02
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	South East Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against Policies STR/SS 1, STR/SS 3, EN 2 and EN24 – see Comment Numbers PSLP_1581, PSLP_1587, PSLP_1589 and PSLP_1591]

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Proposal: Tunbridge Wells Borough Council Pre-Submission Local Plan

South East Water would like to thank Tunbridge Wells Borough Council for bringing the Tunbridge Wells Borough Council Pre-Submission version of its Local Plan to our attention.

Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP19 in August 2019. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 60 years up to 2080. The plan takes into account planned housing growth as well as the potential impact of climate change and includes our ambitious water efficiency programme. For more information please visit our

website:<https://corporate.southeastwater.co.uk/about-us/our-plans/water-resources-management-plan-2019/>

In South East Water's most recent business plan we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our business

plan:https://corporate.southeastwater.co.uk/media/2901/sew_five_year_business_plan_2020-2025.pdf

We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the wider south east region and are nationally represented in the Water UK water resources long-term planning. Our aim of reducing demand requires the use of new approaches and technology. Although there is some uncertainty on the level of savings that can be achieved we are seeing a development of new technologies and we are committed to reduce personal water usage and leakage levels in order to be more sustainable for next generations.

Our preferred plan for the period 2020 to 2025 includes a mix of demand management initiatives such as leakage reductions and an ambitious water efficiency programme. During the period 2025 to 2045 we will continue our demand management initiatives to achieve further leakage and water efficiency savings. However, by this stage we will need additional water supply options to meet the increase in shortfall of our supply demand balance.

Several of the options within our preferred plan come directly from our engagement with third parties, for instance the regional transfers that resulted from our participation in WRSE. Other options, such as catchment management, rely upon our ability to work with stakeholders, or as with our water efficiency option, we rely on our ability to engage and influence customers' water use behaviour.

In our water resource zone 1 (Tunbridge Wells) we are developing regional water transfer schemes such as importing water from Sutton and East Surrey Water (2042) to our WRZ1 area (Tunbridge Wells) and a targeted catchment management interventions programme in the Pembury area (2034).

South East Water have now reviewed the plan and would like to comment that it is important and agree with Tunbridge Wells Borough Council on the points raised as part of the Local Plan strategic objectives

and would like to add that water efficiency should be a key aspect to be promoted to existing buildings and new buildings, either residential or non-residential across the Council as part of these objectives.

We welcome the changes and the introduction of a new target of 110 litres per person per day instead of the current mandatory target of 125 litres per person per day within Policy EN 24 -Water Supply, Quality, and Conservation. We recommend the Council to be ambitious and try to achieve lower targets as soon as regulation permits and to include a lower optional standard which could be trialled in selected new developments. South East Water fully support this policy as we are keen to collaborate with Tunbridge Wells Borough Council and understand how this policy will be implemented, monitored and the potential benefits of it. South East Water consider that it is important that the Council and developers liaise with South East Water to ensure the timely delivery of water supply infrastructure that is adequate to meet future demand.

South East Water support the introduction of sustainable design standards in Policy EN 2 - Sustainable Design Standards for all residential and non-residential developments where water use standards should be a main focus for developers as well as the monitoring responsibility from the Council.

Our main areas of concern are Capel Tudeley followed by Paddock Wood. South East Water would need to supply the bulk of the water for these sites from the north, from our water resource zone 6 (Maidstone) to our water resource zone 1 (Tunbridge Wells). Our preferred plan for the period 2020 to 2025 includes a new water supply option in WRZ6 to construct a new water treatment works at the former Aylesford Newsprint site. We are planning to increase the transfer capacity from AylesfordNP to Kingshill first (Water Resources Mains scheme) but will also require reinforcement from Beech reservoir down to Paddock Wood.

We would then connect across to the Tudeley development from there by laying new mains. The development in East and Central Paddock Wood will be easier to support from the existing network but a shorter length of main may be required for those on the East. This will require early confirmation that development is progressing.

South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure.

South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators.

South East Water would like to be kept updated with any developments relating to the Tunbridge Wells Borough Council Local Plan and we welcome the collaboration with the Council. We look forward to working with Tunbridge Wells Borough Council to ensure that drinking water supplies remain protected in the area in the future.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

For office use only

If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Lesley Stanley ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Lesley Stanley ([REDACTED])
Comment ID	PSLP_1328
Response Date	04/06/21 15:43
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Lesley Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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My mother has lived in Tudeley her whole life and I lived there for approximately 25 years, but still live locally. I have witnessed increasing levels of flooding which will only become worse as climate change and rising sea levels get worse.

I do not believe that Tudeley is the right area for the level of housing proposed. TWBC want to add 2800 homes to Tudeley which is an increase of over 500%. This is a completely disproportionate amount that will destroy up to 600 acres of rural greenbelt. There has been a complete lack of interest in looking into other areas as alternatives such as Blantyre which has 300 acres of government owned land available which is not greenbelt or Areas of Outstanding Natural Beauty. Hundreds of acres of good quality farming land will be lost if plans proceed in Tudeley and East Capel.

Presently 2,452 people live in Tudeley and the Capel area. The Local Plan would see that increase to potentially over 13,700 people, many with private cars which will further exacerbate traffic and congestion. Capel is a rural parish and only has 2% of the borough's population but is being allocated 45% of the entire borough housing plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Andrew Stanley ([REDACTED])
Email Address	[REDACTED]
Address	[REDACTED] TONBRIDGE TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Andrew Stanley ([REDACTED])
Comment ID	PSLP_1340
Response Date	04/06/21 15:49
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Andrew Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR//SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Some of these comments are replicated in my submission under Policy STR/SS 1 although those are mainly by way of introduction.

I have lived in Capel for 25 years and Paddock Wood (PW) for 35 years and know the area well. Accordingly, my comments are made from personal experience and knowledge of the area.

There are many reasons why this plan is ill conceived. The fundamental flaw begins with TWBC selecting sites based on the land being offered up at various times via "calls for land" rather than seeking the most appropriate sites. The plan is then written from that perspective. Many sites were rejected for specified reasons which also apply to Capel – but Capel was selected!

The plan for Capel (in total) was not made known to the public until May 2019. It has been extremely time consuming and difficult for Capel parish residents to respond. Despite that there was a huge response to the plan at regulation 18 stage. The majority of the 2,000+ who responded to the consultation exercise, described as "the highest response to any consultation/engagement undertaken by TWBC Planning Services" objected to the plans for Capel Parish. I understand that over 95% objected to the plan and many of those participants were from outside the parish. That isn't "buy in" by the public. Following Regulation 18 additional houses were added for Capel!

I have attended in person or by Zoom all meetings relating to this matter held by TWBC. The Council has virtually ignored the opposition to Capel being unfairly/disproportionately treated and discussion has been limited to legal minimum requirements. It would be hard to detect from TWBC meetings that Capel was an issue. Regulation 18 did not resolve any issues; they were simply ignored. The Council leader's view throughout is his oft quoted "just get this through."

Throughout, the Planning Officer has stated that there is no alternative plan and Councillors have advised me that it's this plan or letting the Government impose a plan. That doesn't seem much of a strategy to me!

I appreciate the Inspector considering this plan has, perhaps, a technical/legal approach but I hope that the views of ordinary people without detailed planning knowledge are properly considered. The objections to the plan and alternatives suggested have, throughout, been dismissed. The lack of any real democratic process has been alarming. We seem to have just gone through a tick box process and are otherwise invisible.

The plan is not proportionate. The rural parish of Capel with 2% of the borough's population has been allocated 45% of the entire borough housing plan; 3 times more than the largest town of Tunbridge Wells and 90 times more than the second largest town, Southborough. Many parishes with similar populations have no or minimal allocations. I understand that it is Government policy to regenerate and develop city and town centres but that is largely absent from this plan. I should also mention "local need". This may depend on the definition of local. Can so many houses be required in such a small area? Why are houses currently being built in PW being marketed in London and Hong Kong?

The area “offered up” by Hadlow Estates to build “Tudeley Village” is entirely rural and given over to good quality agricultural land. It stretches from near Tonbridge to the edge of Five Oak Green village (also Capel). It is adjacent to and overlooked by an AONB. There are many footpaths in the proposed development area and these will all be lost as places of rural retreat. We have seen a significant increase in people using the countryside; seeking quiet open spaces. These walks will remain but only through housing estates. Anyone wishing to find peaceful walks will be required to drive elsewhere.

The National Planning Policy Framework requires exceptional circumstances to allow building on greenbelt land and that they are fully evidenced and justified - otherwise the Metropolitan Greenbelt has no purpose TWBC has treated greenbelt as the solution without adequate consideration of the alternatives. In my view, the lack of proper consideration of alternatives means the Council has not met the test to remove more than 5% of the borough’s greenbelt – all of it in Capel.

Tudeley is on the River Medway flood plain. I believe that Capel and PW are home to all of the borough’s flood plain. Three times in the last 10 years the area has been subject to serious flooding; the most recent in January 2020. Hartlake Road, which would be the main access road, is a rural country lane and floods regularly. It is accessed over a single lane rail bridge. It is adjacent to the River Medway and runs over that river. With climate change now accepted and recognised and with existing conditions certain to deteriorate it defies logic that Tudeley is the chosen site for major development when many alternatives are available. Para 155 NPPF 2019 states “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)”. No amount of “betterment” (TWBC) can add thousands of houses to an existing flood plain and not adversely affect flooding for the area and others further down river in adjoining boroughs.

The development is proposed both north and south of the existing rail line. The two separate parts of the development will therefore be separated by a rail line and connected by a country track (single file) under a rail bridge. That road at the point of the road bridge is subject to regular flooding. That country lane is entirely unsuitable for more than occasional traffic and no high-sided/large vehicles. No new bridge is planned and the cost would be prohibitive. As the site is close to PW and Tonbridge the rail authorities have stated there will not be a station added therefore residents will drive to Tonbridge. This will add considerable pressure on the surrounding road system and already stretched parking availability. Tonbridge and surrounding villages such as Golden Green and Hadlow will be badly affected by the proposal but those residents must speak for themselves.

The rail system itself was at capacity before Covid and although no-one can predict the future it is likely to slowly return to that position with major developments along the line before Tonbridge at Paddock Wood, Marden, Staplehurst and Ashford (to name just four). There was insufficient parking previously and that can only worsen with thousands of additional houses.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

TWBC has not adequately considered alternative sites and dismissed many after little more than a cursory glance. It has rejected sites for a variety of reasons, many or all of which also apply to Capel!

As an example, of which there are many, – the plan rejects land north of Badsell Rd, Five Oak Green (Capel) because it is greenbelt, greenfield and noise near rail line. This site is within the village and would be considered as infill. The site at Tudeley is greenbelt, greenfield and adjacent to the rail line - See appendix H – page 311 of Sustainability Appraisal.

Such inconsistencies exist throughout the plan

TWBC has not fully explored brownfield sites and has dismissed some on spurious grounds. Considering the numerous negative aspects relating to Capel it is difficult to understand how a large brownfield site at and adjacent to the former Blantyre Prison can be quickly rejected together with a greenfield site surrounding the area. It is understood that almost 300 acres of land is available in this area. That site is government owned and not AONB or greenbelt!

Capel Parish Council does support a development at Castle Hill which is located to the west of and with easy access to the A21 and to the north of industrial units at North Farm. This remains within the Capel parish boundary and also far exceeds a proportionate number of houses in the parish. This was rejected by TWBC. The concerns were that the area is an AONB and that Natural England objected. However, TWBC has granted planning permission for a business park in the same area at Kingstanding Way. TWBC also supports a re-routing of the A228 through AONB and greenbelt. It is apparent that TWBC simply amends its argument to suit itself; effectively arguing in opposing directions at the same time.

To add to the proposed destruction of Capel as a rural parish, TWBC (in conjunction with Kent County Council) to build a road from the A228 across to Tudeley through the quiet hamlet at The Alders. That should just about remove all quiet places from the parish. Capel Parish Council has put forward alternative suggestions (irrespective of the proposed development) but has been ignored.

The density of housing at many of the sites questions the lack of adherence to the NPPF. Paragraph 123 states –“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.

TWBC has not followed this advice and has generally adopted national planning guidelines of 30 properties per hectare thereby ignoring its own claim of shortage of suitable land! By increasing density levels TWBC could meet its own housing target on brownfield and greenfield sites and have no need to encroach on any greenbelt land. It is also anomalous that TWBC can claim a lack of land outside AONB/Greenbelt yet still decide to plan for more houses than it is legally required to and to offer to take some of a neighbouring borough's complement.

In my view the density of required housing is linked to the population forecast over the same period as the plan. The population under 65 is scheduled to fall over the planning period and increase over that age. An ageing population want smaller properties, residential or assisted care. Looking at building densities proposed that is not the property that is proposed in this plan. It also fails to account for properties becoming available as the elderly downsize or move into the aforementioned care.

20% of the borough is non-designated yet very little of the proposed development is in that area. The old cinema site in Tunbridge Wells has been derelict for 20 years. There are other neglected areas. There are many examples of this plan being manufactured around land being offered in the right quantities. Despite the length of the various reports this is a lazy plan which doesn't hold up when opened to detailed scrutiny. It falls down on all or most of the requirements of NPPF -section 11, paragraphs 122 and 123 being examples.

The Pre-submission plan does not, in my opinion, meet the requirements of the NPPF and does not evidence the exceptional circumstances required to develop the land at Tudeley. To plan such a major development in the borough in a small rural area on the only flood plain seems perverse.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The estimated cost of the Local Plan is £339m with 102 costings yet to be agreed (infrastructure Delivery Plan -March 2021). In effect this is simply an unknown total cost. This results in an incredible risk depending on the viability of developers and funds available from local authorities. As we know with estimated costs, these will rise significantly by the time any work commences and considerably more as any project moves forward.

A significant reduction in costs can be achieved by using existing infrastructure which could be vastly reduced by utilising existing roads such as the A21 and developed areas around North Farm, Pembury Road and Longfield Road.

The cost of the plan is a calamity waiting to happen.

There is only minor reference to development within/regeneration of the two major towns in the borough, Tunbridge Wells and Southborough.

TWBC should look again at brownfield and other sites and apply detailed sustainability tests to those. The report discloses a distinct lack of testing of many potential sites, many ruled out for the same reasons that Capel was "ruled in".

TWBC has completed a Sustainability Appraisal for this site based on assessing and determining a score against 19 sustainability objectives. Scoring for each of the 19 objectives is informed by between 2 and 5 detailed and specific questions. In total there are 62 sub-questions based on a set of specific criteria. By going through this process it should provide a reasonably objective and transparent sustainability appraisal for each site.

TWBC has completed a sustainability appraisal for Tudeley Village. The assessment is at the 19 strategic objective level – and doesn't address its own sub-set questions. This is unsatisfactory considering how important the outcomes are for the borough and its neighbours!

As far as I'm aware sustainability appraisals have not been undertaken (even at the top strategic level) for other sites as they were quickly ruled out.

I believe this to be a major flaw in TWBC assessments and adds further weight to the view that a sustainability assessment has not been adequately completed.

How can it be sustainable to put 6,000 houses in the borough's only flood plain? The NPPF is clear in the need to avoid areas subject to regular flooding. Climate change confirms that this will get worse. Throughout the report and its many referenced supporting documents there is a never-ending reference to Masterplanning which is clearly the get out of jail card for all problems. It may be a worthy thought but it isn't the answer to the many failings of this lengthy and detailed Pre-submission plan.

In my view there is nothing that masterplanning (whatever that means in practice) can do with a plan that is ill conceived. I am surprised that with such masterplanning at the forefront, the Planning Officer has advised throughout that there is no back-up plan! So, does that mean entirely starting again? That does not suggest the Council is prepared to listen to any significant extent. All organisations have back-up plans on major projects and often more than one.

An example of Masterplanning: "Heritage is a key matter which needs addressing, especially regarding All Saints Church which is Grade I listed and lies to the west of the site. However, with a masterplanned approach to development it is considered the effects of the development on this and other heritage assets could be properly explored". Ref- Page 8, Site Assessment Sheets for Capel Parish. The one quoted explains how surrounding a world-renowned rural church visited by people worldwide with 2,800 houses can be made acceptable (or is so vague as to have no meaning).

Most references to masterplanning are as suitably vague throughout the documentation.

It is also understood that Tudeley development will be masterplanned by Hadlow Estates either solely or in conjunction with TWBC. It is interesting to note the density of housing proposed at this site for 2,100 houses initially; to be followed by a further 700. The proposed densities of 15-30 dph suggest that the NPPF is not being adhered to regarding land shortage and/or use of greenbelt and is being marketed at a certain level of clientele/cost. The fact that TWBC agree this position with the landowner is a matter of considerable concern.

This plan has the hallmarks of a project which had the aim of just getting a plan with enough houses to appease government pressure and remove pressure from TWBC. I could be wrong.

It is extremely difficult from reading the documents to determine the extent of and cost of affordable housing. Irrespective of where development eventually takes place. I have real concerns that that developer profits will overcome the planning system.

Supporting Information File Ref No: SI_70a-c

Comment

Consultee	Tara Stanley [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Tara Stanley [REDACTED]
Comment ID	PSLP_1173
Response Date	03/06/21 23:22
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	flooding 10.jpg flooding 9.jpg flooding 8.jpg
Question 1	
Respondent's Name and/or Organisation	Tara Stanley
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have been a resident of the area my whole life (33 years). Most of my family and my friends reside in Tudeley Village or surrounding areas and have lived their entire lives locally.

Over recent years I have noticed how traffic congestion has increased severely, causing me daily delays and issues. I have seen the effects of Tudeley becoming busier and this is without the proposed increase in housing and the large amount of people who would come with this. The primary school already generates huge traffic issues on the road and to add to this would bring further chaos. I have suffered with breathing issues such as asthma since childhood and am deeply concerned at the prospect of greater air pollution with more cars on the roads.

I have also seen how flooding devastates Tudeley which has many high risk areas. The land around Tudeley and Capel has frequently been unwalkable with severe and repeated flooding issues. Photos attached.

I have been concerned about the proposals for numerous reasons including the lack of infrastructure to support the developments. I see Tudeley struggling with its numbers already, with a lack of school places, lack of GP and dental availability. I have concerns over how much worse the traffic can possibly get with the possibility of thousands more cars on the road locally. I feel the proposals will create Tudeley and Paddock Wood into one large urban sprawl, ruining its beauty. Our beautiful green spaces will be stamped out, along with its bio-diversity- leaving us with an over-populated area, unequipped to cope or support its increased numbers and losing 600 acres of greenbelt land. There has been a lack of engagement with the public response to Reg 18, and it has been clear this this has been a widely unpopular proposal to residents for all of the above reasons. 97% opposed the plans.

Tunbridge Wells Borough Council is set to get all the council tax from the proposed housing whereas Tonbridge and Malling will get nothing but an increase in issues regarding traffic, flooding and shortages in education and medical facilities. The council leader told Save Capel -'you will never win'. As a resident, I feel as though our opinions simply arent being considered.

I do not believe that Tudeley is the right area for the level of housing proposed. Tunbridge Wells Borough Council want to add 2800 homes to Tudeley alone which is a 500% increase and I believe this is a completely disproportionate amount that will destroy our rural greenbelt. 51% of Local Plan housing is trying to be forced upon Capel Parish which clearly lacks any balance. There has been a complete lack of interest in investigating other areas as alternatives such as Castle Hill or Blantyre. Hundreds of acres of good quality farming land will be lost if plans proceed in Tudeley. The local plan is proposing 15 or more years of large construction sites with huge infrastructure issues that simply cannot support this.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Andrew Sweeney ([REDACTED])
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Andrew Sweeney ([REDACTED])
Comment ID	PSLP_1372
Response Date	04/06/21 16:39
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Andrew Sweeney
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Flood Risk

There was a significant flood event in 2013/14 affecting Tonbridge and Golden Green.

Tudeley is in a flood risk area.

HOW can development of such an area even be considered both from a common-sense point of view and in light of Govts concern over sustainability and global warming.

These proposals are surely a future scandal if allowed to proceed.

It should also be noted the South-East of England is prone to a lack of water; with the reservoir at Bewl Water frequently suffers low levels in summer. Has proper research to be done to evaluate the impact of a new town on supply?

Road Transport

Congestion in and around Tonbridge at Peak hours is already terrible.

This is due to the high number of secondary schools in the area plus Tonbridge main line station is a major draw for commuters.

Placing a new town on the border will obviously impose a huge negative impact for Tonbridge.

My daughter attends school at TWGGS and her bus journey of 6 miles frequently takes around 45 minutes and this is primarily due to the amount of time it takes for the bus to transit Tonbridge (as it exists now).

It is no exaggeration to say these proposals could inflict utter chaos to the finely balanced Tonbridge transport network.

Finally I note the proposal to close Hartlake Road, a well-used route particularly at peak times

I often use Hartlake road to avoid the considerable congestion in Tonbridge and TWBC plan is to shut this vital route whilst simultaneously seeking to worsen the congestion in Tonbridge.

This is simply outrageous.

Rail Transport

A huge expansion of housing at Tudeley & Capel, along with other housing development downline in Kent will put significant demand on peak time train services. It is unclear if Tudeley will have a station and if not then of course commuters will be drawn to Tonbridge via road.

Tonbridge station parking is already limited and constrained so thousands more commuters and or vehicle movements really could be disastrous.

Process

Has TWBC worked to identify brownfield sites to the same extent as they have targeted greenfield sites for development? Despite the assertion that no other brownfield sites exist some might suspect TWBC prefers to deal with a single transaction, rather than engage in the hard work to identify multiple but more suitable locations.

Para 137 NPPF requires local planning authorities to “examine fully all other options for meeting its identified need for development” before concluding whether exceptional circumstances exist to justify changes to Green Belt boundaries.

Does this draft plan fail this test?

The land to be used is Green Belt that lies adjacent to Kent's Area of Outstanding Natural beauty (AONB) and in close proximity to at least one Area of Ancient Woodland. To use Green Belt land, there must be “exceptional circumstances”, and housing need is NOT sufficient to overrule currently protected Green Belt.

It is understood that the housing need figure is not a mandatory target and the NPPF is clear that only in exceptional circumstances may a Green Belt boundary be altered, through the Local Plan process.

Consequently, Government-imposed housing targets are disproportionate for a borough and parish with such a high proportion of Green Belt and/or AONB land.

Sevenoaks Council has pushed back on this external imposition of housing targets from central government which in any case, uses out of date 2014 ONS data, not the updated 2016 numbers.

Finally, TWBC received extensive comments objecting to the local plan in 2019 and apart from dropping its grossly ill-conceived proposals for another school in Tonbridge has ignored the responses and is just carrying on trying to bludgeon its way through.

In summary

Unwarranted proposals to build on green belt and on flood risk areas.

TWBC will benefit from receipt of council tax while residents of TMBC will suffer the considerable degradation in the environment and their quality of life.

As a resident of Hildenborough and TMBC am I wrong to view this as a cynical attempt by TWBC to offload the impact of their proposals onto residents of a neighbouring authority which has its own housing needs to address?

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Peter Tate [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Peter Tate [REDACTED]
Comment ID	PSLP_1051
Response Date	02/06/21 21:25
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Peter Tate
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Paragraph No(s) 5.199 to 5.229

Policies Map (Inset Map No(s)) 31, 32, 33, 34

Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Legally compliant. Little community involvement, if there was the plan would not go ahead as nobody wants it!

Sustainability: "To meet the needs of the present without compromising the ability of future generations to meet their own needs". This is not true as there will be considerable loss of open country, location dictates car usage which will generate considerable on-going traffic congestion and poorer air quality than currently exists, rail transport overcrowding, inadequate rail car parking at Tonbridge and Paddock Wood, inadequate water treatment facilities and water supply. Development will last for years affecting a large area from lorry movements and congestion, exhaust fumes and noise, This is all apart from the unsustainability of the manufacture of millions of bricks, blocks, roof tiles, thousands of tons of concrete and numerous other building materials.

Sound. Not positively prepared in conjunction with neighbouring authorities. No cross boundary working. Not consistent as it's not sustainable.

No duty of co-operation as little or no consultation with neighbouring authorities.

Question 6

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The whole site could be re-located elsewhere where there is better transport links e.g. the area around North Farm which is already being developed. It is closer to Tunbridge Wells has easy access to the

A21 has a large choice of shops (and therefore employment) and has local leisure facilities. There is less or no impact on neighbouring authorities therefore less need for cross boundary working.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Refer to 5 above.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_99

Comment

Agent	Ryan Johnson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Turley
Address	[REDACTED] Southampton [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Taylor Wimpey UK Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Taylor Wimpey UK Ltd [REDACTED]
Comment ID	PSLP_1820
Response Date	04/06/21 09:57
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	PSLP_1772-1828 (not inclusive)_Turley for Taylor Wimpey_SI.pdf
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Taylor Wimpey
Question 2	
Agent's Name and Organisation (if applicable)	Turley
Question 3	

To which part of the Local Plan does this representation relate?

Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: this representation has been input against the Pre-Submission Local Plan as a whole, Policies STR 1, STR 7, STR/SS 1, STR/SS 3, STR/CRS 1, AL/CRS 3, PSTR/HO 1, EN 2, EN 9, EN 14 and EN 26– see Comment Numbers PSLP_1772, PSLP_1813, PSLP_1818, PSLP_1819, PSLP_1820, PSLP_1821, PSLP_1823, PSLP_1824, PSLP_1825, PSLP_1826, PSLP_1827, and PSLP_1828. The full representation has been attached as Supporting Information]

Question 4

Do you consider that the Local Plan:

Is legally compliant

No

Is sound

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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TUNBRIDGEWELLS PRE-SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION LAND WEST OF FRYTHE WAY, CRANBROOK (SHELAA REF: 25)

Thank you for the invitation to comment on the above consultation. We write on behalf of our client, Taylor Wimpey UK Ltd, who control land west of Frythe Way, which abuts the south eastern edge of Cranbrook (SHELAA Site Ref: 25).

We have examined the Pre-submission Local Plan (PSLP) and conclude that as drafted it is neither legally compliant, nor sound. The Council's Sustainability Appraisal (TWBC, 2021) concludes Option 13 (The Pre-Submission Local Plan) to be an 'appropriate strategy'. We are unable to reach the same conclusion, as the SA has not first taken into account 'reasonable' alternative strategies, contrary to paragraph 35 of the NPPF and the corresponding SEA Regulations.

We also conclude that Tunbridge Wells Borough Council's (TWBC) statutory Duty to Cooperate under Section 33A of the 2004 Act has not been discharged. The Council has not in our view demonstrated that there has been active, constructive or on-going engagement with adjoining authorities, including Sevenoaks District Council (SDC), in respect of known unmet housing needs. Nor has an effective

strategy been put in place between the authorities to address such needs. The justification drawn from the SA process that TWBC are unable to assist SDC is contested. Distributing such unmet needs solely in line with SA Option 9 (Dispersed Countryside) is not a reasonable alternative in our client's opinion. It serves only to support a pre-determined outcome to select Option 13 (Pre-Submission Local Plan) as the 'appropriate strategy'.

In addition, the site selection process that flows from the SA (TWBC, 2021) and SHELAA (TWBC, 2021) contains notable errors and inconsistencies, which appear to have contributed significantly to the omission of more suitable and sustainable sites in favour of those proposed in the PSLP.

The quantum of growth proposed in the PSLP, and the over reliance placed on two large strategic sites to deliver between 67-69% of newly allocated supply is also questioned. In relation to the first, we contend adjustments are required to the overall housing requirement to both reduce the evident shortfall in affordable homes, and to assist adjoining authorities with known and growing unmet housing needs. We contend this is particularly important given three of the adjoining LPAs have been reported on as failing to discharge their statutory duty to cooperate, with their Local Plan's either withdrawn or delayed as a consequence. In addition, the Secretary of State for Housing, Communities and Local Government has confirmed there are significant unmet and mounting housing needs requiring collaborative action with London within the next five years. All of which highlights how important it is for the emerging TWBC PSLP to be positively prepared.

Turning to the second issues, we outline concerns over the justification for, lead in times and annual yields purported for the two strategic sites. It is our contention that these are unrealistic, and are contrary to leading evidence bases published for sites of this scale. As a consequence, we suggest the quantum of growth envisaged will not come forward as fast or at the rates envisaged, nor will it be delivered within the plan period. We accordingly recommend additional allocations are made to compensate for this shortfall, in sustainable locations that are capable of being delivered in the first five years of the plan period. We outline concerns in relation to TWBC's land supply assumptions in this period to evidence such a need.

We also outline concerns over the quantum of growth directed to certain locations and settlements. We contend these proposals are unlikely to support the climate change objectives set out in Policy ST7 of the PSLP. Our client supports the justification for and benefits of strategic growth at Cranbrook, ranked 2nd in the Settlement Role and Function Study (TWBC, 2021). In this respect, our client's site (Site 25) represents a modest proposal for 70 homes that is well contained by woodland, is partly within the settlement, has good accessibility to the high street and other facilities by foot (far better than some of those chosen for allocation), and no other overriding constraints to development. We set out in detail the factual errors, inconsistencies and missing evidence in our comments on the SA and SHELAA process below, which has thus far led to the omission of this site for allocation.

Our client continues to respectfully purport the justification for and benefits of this site's allocation. This includes the sharing of an emerging vision for the future of this site (See Document A); and confirmation from Kent County Highways there are no overriding highway constraints to the delivery of the site (see Document B). The land required to deliver the proposed development, its accompanying infrastructure and community benefits is in the control of Taylor Wimpey. It is available for development now, can be delivered well within five years and is considered a suitable and logical location to direct some of the future growth needed at Cranbrook. The emerging vision document appended confirms there to be no known overriding constraints to the delivery of these proposals.

Given the nature and detail of our representations, specifically in relation to the plans legal compliance and soundness, we would respectfully request attendance to participate in the examination of the PSLP. In the interim, the following representations are made to assist the Council and Inspector in their examination of the PSLP.

Soundness

STR/SS3 – Strategy for Tudeley Village

For the avoidance of repetition, see our comments / objections to Policy STR1 and STR 7 in relation to the capacity, lead in time and delivery rates assumed for this site; and conflicts with the plans climate change objectives. We suggest there is a consequential need to allocate additional sites in place of, or in addition to this, to compensate for deficits within the plan period. In this respect, we purport the benefits and modest contribution our clients site (Site 25) can make to assist in addressing such deficits.

We trust these comments are useful and duly noted. We would welcome the opportunity to elaborate on such matters at the forthcoming Examination into the subsequently submitted version of this Plan.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Tennant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	David Tennant [REDACTED]
Comment ID	PSLP_999
Response Date	02/06/21 22:36
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	David Tennant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3 (Tudeley Village)	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Dear Sir,

I am a resident of the Borough of Tunbridge Wells and I live on the boundary between TWBC and TMBC. The boundary between the two boroughs follows the stream which run through our garden. We pay council tax to Tunbridge Wells.

My personal details are:

Name: David Hugh Tennent

Response category: I am responding as an individual

Email address: xxx [TWBC: full personal contact details redacted]

Postal address: xxxxx Postern Lane, Tonbridge, Kent

Post Code: TN11 xxx

Telephone number: landline xxx. Mobile xxx

I have been fortunate enough to benefit from the beautiful Kent countryside afforded by the green belt, which we very much hope will be protected and enhanced, as required by the National Planning policy.

The Postern is a grade II* listed building, dating from 1753.

I have been a schoolmaster at Tonbridge School, teaching biology and geography, for 37 years (with a keen interest in ecology) and we have lived at The Postern for 28 years. We know the locality well and feel very privileged to live here.

I am writing to object to "The Strategy for Tudeley Village" (Policy STR/SS3).

- . Creating a garden settlement at Tudeley of 2,800 houses will cause harm to residents of the Parish of Capel **and** to residents of Tonbridge. There will be a significant increase in traffic in to Tonbridge from the B2017, exacerbating the extreme traffic congestion that exists on this road every morning (and many afternoons).
- . People living in Tudeley will use Tonbridge Station for commuting and it is Tonbridge town services which will need more parking. Its roads are already extremely full at peak times.
- . The increased numbers of passengers on already packed commuter trains from Tonbridge Station will be unsustainable. Parking in and around Tonbridge Station will be even more difficult and more passengers will have to stand on the trains during rush hour.
- . Most people living in the new garden settlements will drive privately owned cars, despite initiatives to encourage bus and bicycle use. The costs of infrastructure on the Tonbridge & Malling side

of the boundary will have to be carried by Tonbridge & Malling residents, whilst Tunbridge Wells will receive council tax from the residents in the new houses.

- . The cost to Tonbridge-based businesses due to traffic issues may drive businesses from the area.
- . There will be an increase in pressure on Tonbridge health services, amenities and car parking as residents from the new garden settlement at Tudeley will use Tonbridge as their local town, rather than Tunbridge Wells, because Tonbridge is much closer. GP practices are already extremely busy and getting appointments can be difficult.
- . Large parts of the developments will occur on the Medway floodplain with flood risk assessments based on old data that may not allow for the impact of climate change. Flood mitigation measures may help, but flood risk will increase. Covering farmed fields with houses and roads will make the Medway flood more often and accelerate run-off, increasing flood risk not only in Tudeley but in Golden Green, East Peckham, Tonbridge and Yalding. These are all areas which have suffered from flooding in the past.
- . There will be an increase in air, light and noise pollution that will spread across the boundary to Tonbridge & Malling and views from Tonbridge to the Low and High Weald will be impaired, damaging the setting of historic assets like All Saint's Church in Tudeley and the Hadlow Tower. The church at Tudeley may well end up being surrounded by houses, which will cause great harm to this world renowned heritage site, with its magnificent set of Marc Chagall windows. We had some Australians staying with us recently and the chance to see the windows was one of the most important reason for them visiting the area.
- . The garden settlement at Tudeley can never be one settlement as it is divided by a railway line. Putting in crossings at frequent points across the railway may be possible, but it won't tie the two halves of the settlement together enough to make it one settlement, so it will never satisfy garden settlement principles.
- . Creating so much housing in Capel Parish will require the destruction of woodland, hedgerows, meadows, and farmland that is Green Belt land which should be protected. It will spoil the landscape and kill wildlife that is very special to the area, including rare species. This area should remain rural with agricultural land that can be used to provide food.
- . Planning guidelines state that housing need calculated by the government can be reduced if it requires development of Green Belt land unless "exceptional circumstances" exist. TWBC is already providing more housing than they need in the draft Local Plan. And do we need to build houses on this scale? Recent ONS figures show that population growth in the borough is slowing.
- . TWBC is using Capel to dump their housing needs on green fields and meadows, polluting a rural area rather than spreading development across the borough on brownfield sites or placing the garden settlement in the middle of the borough, to make it accessible north and south. The developments in Tudeley is unsustainable and place huge pressure on Tonbridge.

Thank you for reading this submission. We feel very strongly that the Green Belt should be preserved for all the reasons outlined above.

Yours sincerely

David Tennant

xxx, Postern Lane, Tonbridge, TN11xxx

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Diana Tennant [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Diana Tennant [REDACTED]
Comment ID	PSLP_1666
Response Date	04/06/21 14:41
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Diana Tennant
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
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Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Postern Lane for 28 years and we have been fortunate to benefit from the Green Belt around this area, which we very much hope will be protected as required by The National Planning Policy. In 2016 the Inspector said that there was no need to allocate any land in the Green Belt to planning as there are a number of Brown Field and alternative sites available.

The main reason for the Green Belt is to prevent urban sprawl. This plan would effectively join Tonbridge to Paddock Wood via Tudeley and East Capel.

2% of the TWBC population live in Capel Parish, with this plan, 51% of the local housing plan is forced on Capel Parish. It is on the edge of TWBC, who will receive the Council Tax and Tonbridge and Malling will have all the traffic, the residents using the station, and schools.

Building so many houses in Capel and Tudeley will cause a significant increase in traffic, as most houses would have 2 cars. There is already extreme traffic congestion on the B2017 every morning and afternoon with people going to the local schools and the station and it is often difficult to get out of the Lane on to the B2017. The many extra cars would also be detrimental to air quality.

The increased number of people using the train from Tonbridge will be unsustainable as the commuter trains are already packed. There was a suggestion that Network Rail will put in another station near Capel, but apparently they will not approve or fund a station or the disruptive work required for bridges and tunnels.

The beautiful landscape across the Medway Valley will be altered forever and for at least 15 years, it will be a construction sight, visible for miles around. A rural Parish will change to an urban one and the existing community will be overwhelmed.

Development at East Capel is entirely on a flood plain. Tudeley has a high flood risk and the water would then go to nearby towns.

Hundreds of acres of good quality agricultural land would be lost forever.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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There are various brown field and alternative sites which would be suitable for houses, rather than building on the Green Belt.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

A large part of the developments will be on the Medway Floodplain and covering good agricultural land with houses will make the Medway more liable to flood and increase the flood risk in Golden Green, East Peckham, Tonbridge and Yalding.

There will be a huge increase in air, light and noise pollution to the Low and High Weald. Many people visit All Saints Church at Tudeley with the beautiful Marc Chagall windows and this Church would be surrounded by houses instead of the lovely Kent countryside.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Andrew Thomson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Andrew Thomson [REDACTED]
Comment ID	PSLP_8
Response Date	27/03/21 15:12
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.6
Question 1	
Respondent's Name and/or Organisation	andrew thomson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3: The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound . It is not justified because:

Question 5

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I object to the 1000 houses at Tudely. A rural green belt area with poor roads and public transport will increase congestion in Tonbridge and should only be built if dedicated rail station with 10 mins walk of all houses is also built with regular stopping services

Increased housing of 1000 properties in Tudely will adversely affect greenbelt type area separating Tonbridge from Paddock Wood and will increase congestion in Tonbridge. As roads are built there will be pressure to infill the area between Tonbridge and Paddock Wood creating urban sprawl. To be sustainable it should be built around a new railway station with regular services. Much more effort should be made by the council to build on brownfield and infill sites with sustainable transport options without reliance on private cars.

Question 6

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Increased housing of 1000 properties in Tudely will adversely affect greenbelt type area separating Tonbridge from Paddock Wood and will increase congestion in Tonbridge. As roads are built there will be pressure to infill the area between Tonbridge and Paddock Wood creating urban sprawl. To be sustainable it should be built around a new railway station with regular services. Much more effort should be made by the council to build on brownfield and infill sites with sustainable transport options without reliance on private cars.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1497
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1498-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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This representation relates to the evidence base supporting the two strategic site allocations at Tudeley and East Capel/Paddock Wood:

The transport evidence base documents underpinning the Local Plan are inconsistent, contradictory and unrealistically optimistic. There is therefore a lack of clarity regarding the infrastructure interventions required to deliver a sustainable plan.

To illustrate this point, the transport assessments, modelling assumptions and proposed mitigations do not take into account normal organic growth and planned development proposals in the Borough of Tonbridge & Malling or other neighbouring authorities and therefore do not adequately address the impacts on the local highway network and the consequential negative impacts on local communities.

Notwithstanding this, the mitigations proposed are considered to be insufficient to fully address all of the impacts on Tonbridge, for example, increased traffic flows into Tonbridge and surrounding villages causing increased congestion and a likely worsening of air quality.

The highway impacts on this Borough will extend beyond Tonbridge, Hadlow, Golden Green and East Peckham, for example additional traffic heading north along the A228 to access the M20 and A26 towards Maidstone and these should also be addressed.

The evidence for the impact on the landscape in the vicinity of the strategic site allocations and biodiversity is incomplete because the Landscape and Visual Impact Assessment only applies to sites located within the High Weald Area of Outstanding Natural Beauty.

Question 6

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To revise the evidence base to address the omissions identified and ensure that the necessary mitigations are implemented

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1499
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraph No. 5.218

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Whilst recognising that there is not a requirement for a new railway station at Tudeley and that Network Rail has confirmed that the proposed growth in Tunbridge Wells borough does not require specific rail capacity interventions the omission of any mitigation of any impacts remains a concern.

TMBC encourages TWBC to continue to promote the opportunity for future provision with Network Rail and the rail operators and that this is revisited at the first review of the Plan. Without a new railway station undue pressure will be put on both Tonbridge and Hildenborough stations and TMBC members fear that the car parks serving both stations and the rail services themselves will be unable to cope with the increased demand created by the proposed development in Tudeley in particular.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
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Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1501
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraph No. 5.222

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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The supporting text states that development will be supported by a cohesive drainage strategy, however, the strategic site allocations will increase the flood risk of the area to the north of Tudeley/Capel Parish, which is already prone to flooding, and this will have an adverse impact on the Medway flood plain.

As a result of this it is understood that the Upper Medway Internal Drainage Board will be seeking developer contributions. Has this been taken into account with regard to the whole plan viability study?

Question 6

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Confirmation that the flood risks have been fully taken into account.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1498
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraph No. 5.217

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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The inclusion of cross-boundary walking and cycle routes both from the new settlement at Tudeley (and associated with the Mabledon House Policy) is a welcome contribution towards more sustainable means of transport, but concerns remain that this together with the proposed additional bus services will not result in the anticipated modal shift from private car use of 10%.

Question 6

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Further evidence of the estimated modal shift of 10% from motorised travel to Active Travel would be welcomed.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1500
Response Date	03/06/21 16:26
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Paragraph No. 5.219

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

Question 5

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The Tudeley Garden Village master plan anticipates the delivery of new local service centres after phase 3 and the new secondary school will be delivered even later. This will put pressure on infrastructure in Tonbridge in the short to medium term, which the Local Plan seeks to avoid. Therefore, how will these impacts be mitigated?

The proposed closure of Hartlake Road to through traffic is a concern as it a well-used route at peak times and it is not clear how the new accesses and internal road layout will provide an alternative north-south route. Whereas, if Hartlake Road were to remain open after the delivery of the Tudeley, East of Capel Parish and Paddock Wood developments then this road and the lanes beyond would be inadequate for the significant new traffic being introduced and the wide reaching consequences described above would be even greater.

Question 6

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The local infrastructure and services at Tudeley planned to meet the needs arising from the strategic allocations and reduce the need to travel further afield to centres like Tonbridge should be delivered earlier in the master planning of the new settlement.

The proposed closure of Hartlake Road to through traffic should be reconsidered.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge Civic Society
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge Civic Society [REDACTED]
Comment ID	PSLP_1276
Response Date	04/06/21 15:08
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Tonbridge Civic Society
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Tonbridge Civic Society – the largest amenity society in Tonbridge with almost 500 members – objects to the above proposals, which would have a big impact on Tonbridge and the countryside near it.

We oppose very strongly on environmental, amenity and infrastructure grounds the proposal to build up to 2,800 dwellings at Tudeley, which is less than 2 miles from Tonbridge (and much closer to Tonbridge than to Tunbridge Wells):

It is environmentally irresponsible to build what is in effect a new small town in an area with no existing public transport, a town whose 5000 or so inhabitants will be dependent on cars to go anywhere;

A development of this size in the Green Belt and immediately adjacent to the High Weald Area of Outstanding Natural Beauty is unacceptable and will destroy the fine, pastoral landscape at Tudeley: it would be contrary to national planning policy;

All Saints, Tudeley has become one of the most visited small churches in England because of its Chagall glass: it attracts visitors from all over western Europe. They see now a church amidst fields. If the plan goes ahead, they will see a church in a housing estate. It is extraordinary that Tunbridge Wells Borough Council is prepared so to compromise one of Kent's most important buildings.

The impact on Tonbridge of this development would be severe. The town has significant traffic problems at peak times because of the concentration of schools and the presence of one of the busiest commuter railway stations in south east England. It would be inevitable that a large development at Tudeley, combined with yet another secondary school on the edge of Tonbridge proposed in this plan, would make those problems worse;

Existing overcrowding at Tonbridge railway station would be exacerbated.

The impact on Tonbridge would be in addition to that of the extensive new development which has recently taken place in the town and which is proposed in Tonbridge and Malling Borough Council's own plan.

The fact that one landowner has accumulated a great deal of land round Tudeley with the aim of developing it is not a reason for allowing this proposal to go ahead. The proposal needs to be looked at objectively, not regarded as a matter of convenience for the Council and the landowner. Looked at objectively, the case against it is overwhelming.

It would make much more sense to develop the large tract of unbuilt land on the north-eastern edge of Tunbridge Wells between Pembury Road and the A21 which would offer easy access to the centre of Tunbridge Wells, including its railway station and to the railway station at High Brooms, both of which are much less busy than that at Tonbridge.

The Civic Society also objects to the building of a new secondary school on the eastern edge of Tonbridge. Tonbridge already has one of the highest concentrations of secondary schools of any town of its size in England. It will be a major traffic-generator, drawing yet more people from the east and south-east of the town towards Tonbridge.

Moreover, urban sprawl east of Tonbridge is undesirable and will impinge visually on Somerhill and its park. If Kent County Council and Tunbridge Wells Borough Council judge that a new secondary school is needed in west Kent, it should be built at Paddock Wood or Pembury.

We request these comments are considered together with our comments on STR/SS1 which are interconnected as far as Tonbridge is concerned.

Ends

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To explain in more detail the injurious impact of the proposal on Tonbridge

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Agent	Steve Terry [REDACTED]
Email Address	[REDACTED]
Address	
Consultee	Steven Terry [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge Line Commuters
Address	[REDACTED] Paddock Wood TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge Line Commuters (Steven Terry - [REDACTED])
Comment ID	PSLP_1163
Response Date	03/06/21 21:36
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Tonbridge Line Commuters
Question 2	
Agent's Name and Organisation (if applicable)	Steven Terry - Committee Member
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS3 For Tudeley Village

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound No

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Tonbridge Line Commuters is the local public transport user group for the Tonbridge & Paddock Wood Area. We have over 50 years of experience in dealing with successive railway administrations and local bus companies in order to maintain and improve services

As an organisation we believe that the proposed Tunbridge Wells Local Plan does not properly address the public transport aspects of building large amounts of housing on greenfield land, and does not properly ensure that adequate transport infrastructure will be provided *prior* to the development starting.

Specifically;

- It is inevitable that due to the largely "dormitory" nature of the proposed Tudeley development that most adult residents will need to travel outside the immediate area to work, even if post Covid-19 there remains a significant element of home working.

- The existing road infrastructure is already inadequate for the volume of traffic. Tonbridge, which is the nearest more major settlement, and the most likely rail head, suffers serious congestion and lack of car parking availability. We are not convinced that a bus link between Tudeley and Tonbridge will be economically viable enough to sustain a regular service with sufficiently long operating hours to significantly reduce car journeys from the development.

- The plan's stated aim of eventually adding a railway station at Tudeley to serve the new development is in a noble idea, but in practice is not likely to be deliverable during the lifetime of the plan. The railway through the centre of the development is a main line, not a metro or branch line, and any current or future railway operator would not wish to add a further station on a such a line between two existing stations that are already only some 6 miles apart, even if the land acquisition and station building cost was to be fully funded.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Patricia Townend [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Patricia Townend [REDACTED]
Comment ID	PSLP_920
Response Date	01/06/21 09:42
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Patricia Townend
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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The construction of such a large built-up area on the margins of a very sensitive part of the Medway floodplain has no proper provision for the loss of permeable ground which will exacerbate the flooding problems along this stretch of the Medway, a problem which will only be increased as climate change affects flood risk in the UK.

The Tonbridge and Malling Borough Council have also objected to the siting of the development on the grounds that it will have an inordinate impact on facilities, road and rail capacity in Tonbridge Town, which is only two miles away.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of the Tudeley Garden Village from the Local Plan

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_77

Comment

Consultee	Tom Tugendhat MP [REDACTED]
Email Address	[REDACTED]
Address	House of Commons London SW1A 0AA
Event Name	Pre-Submission Local Plan
Comment by	Tom Tugendhat MP [REDACTED]
Comment ID	PSLP_1447
Response Date	01/06/21 15:25
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	PSLP_1447 Tom Tugendhat MP Reg18 response SI.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Tom Tugendhat MP
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please accept this letter as my response to the consultation by Tunbridge Wells Borough Council (TWBC) on the Pre-Submission Local Plan. Though I do not represent any part of the borough of Tunbridge Wells in Parliament I am responding to this consultation, as I did during Regulation 18, as some of the proposals will have a clear and direct impact on Tonbridge, Golden Green, East Peckham and surrounding areas, which I am privileged to represent.

I am aware that the current, Regulation 19, consultation is separate from previous consultations undertaken by TWBC on this Local Plan. Therefore, completeness I am enclosing a copy of my letter to TWBC dated 29 October 2019 as my response to the previous consultation. This is so it can be included in the submission to the Planning Inspectorate.

The reason I do this is because the fundamental shape of the Local Plan has not changed, and the vast majority of the impacts I describe in this letter remain; as do the concerns of residents across Tonbridge and Malling. Since 2019 I have spoken with hundreds of people who have reservations about the scale and location of development on the border with Tonbridge and Malling, which is why these concerns still stand.

The representations in question focus on STR/SS1, Strategy for Paddock Wood, including land at east Capel and STR/SS3, Strategy for Tudeley Village specifically. This includes around half of the proposed development within the period that the TWBC Local Plan runs for, allocated for such a small part of the borough against the Tonbridge and Malling borough boundary, where there are already severe infrastructure issues that residents have to contend with.

I am pleased that some minor changes have been made since the TWBC Regulation 18 consultation in 2019. For example, no longer allocating land directly adjoining Tonbridge for use as a Secondary School is very welcome; the concentration of excellent existing secondary schools in south Tonbridge leads to traffic issues every morning and afternoon with so many children already travelling from afar for their education. In addition, I know that the impact of the allocation of this site on Tonbridge, especially through increased drainage and flood risk, was causing severe concerns from residents immediately neighbouring the allocation.

However, this is not to suggest that the other issues mentioned in the letter of 29 October 2019 have been resolved and I would draw attention towards the detailed comments made then, since they remain relevant. It is the strong view of the majority of residents I have spoken to across Tonbridge and Malling that the proposed mitigations are considered to be insufficient, especially in relation to the impact on the road network. In addition, the concerns referenced regarding rail and bus capacity remain, all of which would place an unsustainable burden on infrastructure in Tonbridge.

Finally, in addition to the matters discussed I wanted to mention significant concerns which have been raised by residents in East Peckham and Golden Green especially around the proposed road changes in Tunbridge Wells borough, which will have a detrimental impact on residents in Tonbridge and Malling. First, I understand that supplementary documents associated with this Local Plan proposed the closure of part of Maidstone Road in Paddock Wood, resulting in longer journey times from the central area of Paddock Wood, where the majority of amenities are located, to the north. This would clearly have an impact on the ability of East Peckham residents to visit Paddock Wood, now the location of their nearest GP practice too, increasing the distance of any car journey.

The other road change which would have a severe impact on Tonbridge and Malling would be the closure of Hartlake Road near Golden Green, which is a well used route, especially at peak time, and risks diverting even more cars on to the already congested A26 Hadlow Road through Tonbridge. As with the proposed closure in Paddock Wood, I have not yet seen any modelling which identifies the impact of either of these closures on Tonbridge and Malling, which should be a pre-requisite before any changes are made.

I had hoped that my response to this consultation would be very different, and the vast majority of the concerns raised in 2019 would have been addressed. Sadly this isn't the case which is why I have no choice but to attach a copy of my letter of 29 October 2019 which details the key changes necessary to reduce the impact of the Local Plan on Tonbridge and Malling.

I have also copied this letter to The Rt Hon Greg Clark MP and Helen Grant MP, who represent Tunbridge Wells borough.

[TWBC: see letter of 29 October 2019 attached as supporting information]

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	Miss Elizabeth Turton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Miss Elizabeth Turton [REDACTED]
Comment ID	PSLP_1192
Response Date	04/06/21 09:40
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Elizabeth Turton
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The so-called Tudeley Village development (by the time it is complete it will be a town not a village) creates so many negatives concerning traffic, infrastructure, AONB setting, environment, bio-diversity, flood risk, urban sprawl. TWBC has failed to cooperate with its neighbouring boroughs. It does not comply with government policy on green belt provision.

I have lived in Tonbridge for nearly 36 years and have seen the town grow hugely, especially in the last 10 years with the result that local roads are congested with traffic and parking. I opposed the original Tunbridge Wells Borough Council Local Plan under Reg 18 because the size and scale of the proposed development at Tudeley and Paddock Wood was well beyond what the area was capable of sustaining. Despite hundreds of objections the Council has ignored most of them and have even, unbelievably, substantially increased the size of the proposed developments at both Tudeley and Paddock Wood. My comments below are on the Tudeley proposal.

The TWBC draft plan being submitted to the Planning Inspector under Reg 19 is a cynical attempt to foist a massive house building scheme (50% of the total in the PLP) on one out of 20 wards in the borough, away from Tunbridge Wells and adjacent to the border with Tonbridge & Malling Borough. Tonbridge will suffer a huge impact on its infrastructure and quality of life for its residents whilst receiving no benefits from increased council tax or developer contributions. It shows a complete lack of understanding of the constraints which Tonbridge lives with currently.

It is extremely likely that most of the proposed housing will be sold to people re-locating from London. Since Covid there has been a surge in the Tonbridge housing market as London residents seek to leave the city. Inevitably many will commute into London or have to travel out of the 'village' for work even post-Covid. And how will they travel? A large proportion will drive to Tonbridge Station or through Tonbridge. No-one is going to go to Paddock Wood Station and pay more for that extra 7 minutes on the train. The 'aspirational' station at Tudeley is never likely to be built. Very few will cycle. Very few will take the bus (which does not exist at the moment and isn't planned for some years). Where will these residents shop, where will they go to school, visit the dentist or the doctor? The proposed primary school and secondary school will not be completed until a large number of homes have been built. It is naïve to think that as soon as they are opened parents will uproot their children from schools they have been attending previously, possibly for some years.

So the number of journeys between Tudeley and Tonbridge will rise considerably on top of what the town has to cope with now. The problem is that Tonbridge, being bisected west to east by the River Medway, only has two roads which cross the river north to south; the A227 High Street which takes you to the car parks near the station and the A21, and the A26 Cannon Lane/Vale Road which goes through the industrial estate and connects to the Tudeley road, the B2017. These roads and the junctions close to the town centre are already heavily congested and not just at morning and afternoon rush hours. A minor incident can grid-lock the whole area within minutes. At peak times traffic can queue from Five Oak Green to the B2017/A26 junction and then to join the A21 or travel into Tonbridge

to join the A26 to Tunbridge Wells. Tonbridge & Malling Borough Council's own Plan aims to put another 400 plus homes on a road where the only way out is onto the A26 not far from the station at a mini-roundabout. The town is not able to solve the problem and adding more and more homes aggravates an already very difficult situation. In addition, some warped logic on the part of TWBC proposes that Hartlake Road be closed to through traffic. They create the possibility of considerably more traffic and then close a road which provides an alternative to those wishing to by-pass Tonbridge from the east. This will create even more pressure on the Hadlow Road into the town which is already.

Of course, the traffic problem does not start when the whole development is complete. There will be years of heavy construction traffic using country lanes to access the Tudeley site before any additional road provision is made. This will be in addition to similar amounts of such traffic accessing the East Capel and Paddock Wood sites. Air and noise pollution levels for current residents will increase.

The Tudeley development will swallow up large swathes of prime agricultural land, plus hundreds of acres of precious Green Belt. Once built over it is gone for ever. In the owner of Hadlow Estate, TWBC have found a landowner who is prepared to profit from selling a substantial amount of the land he inherited instead of being a custodian of the countryside and protecting it and ensuring his tenants' futures. It saves TWBC so much effort instead of finding small pockets of land which can be sensitively developed where they would have to negotiate with numerous landowners. The town of Tunbridge Wells itself has development sites which have been derelict for many years and it is in serious decline, in need of regeneration with many opportunities for housing.

The Conservative Government, in the person of the Prime Minister, has said that Green Belt should be protected but TWBC, a Conservative council, seem not to agree. In addition to building on Green Belt they are planning to extend quarrying which will swallow up another 200 acres. The Green Belt is supposed to protect against urban sprawl. By ignoring its designation in this case the space between Tonbridge, Tudeley, Five Oak Green and Paddock Wood will practically disappear. As well as constructing housing land will be sacrificed to widening or building new roads. There will be more and more built environment instead of green space. Obviously with the loss of so much agricultural and green belt land biodiversity can only suffer. They have not taken the character of the landscape into account, the Green Belt and the High Weald AONB.

Flooding is a significant issue in the Tudeley area. Hartlake Road was closed for days at a time in the winter just passed, 2020/21, as it has been in the majority of the winters for the last ten years. How does adding 2,000 plus homes as well as commercial, educational and medical facilities and the necessary roads and paths help to control flooding from the River Medway? The farmland can absorb the water during the winter and still be viable the rest of the year for production. The Tudeley development will exacerbate the problem locally and push the problem downstream as well. The mysterious 'mitigation' of the flood risk is not explained.

As far as I can see, Tunbridge Wells Borough Council have ignored the objections raised at the Reg 18 stage of the PLP. They have considered their borough in isolation, as if it is an island with no relevance to the boroughs which surround it and their Local Plans.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Graeme Veale [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Graeme Veale [REDACTED]
Comment ID	PSLP_1184
Response Date	04/06/21 08:39
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Graeme Veale
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR / SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Have you ever run from Goldsmid Hall up to Somerhill and paused half way up to take in the spectacular views of the surrounding green belt countryside? Or run down from Half Moon Lane through the serenely pretty woods and fields to Tudeley church? This area is agonisingly beautiful.

I am a resident of nearby Postern Lane and have lived in the area for 3.5 years. I suffer the regular inconvenience of heavy rush hour traffic, mainly going in and out of Tonbridge, which is the town principally serving Tudeley.

Situating a new garden town next to Tonbridge will only increase the burden on Tonbridge and its infrastructure rather than burdening/benefitting Tunbridge Wells.

This is one of many puzzling outcomes of the TWBCs plan. Proposed new roads cutting a swathe through large sections of green belt would be a travesty to such a beautiful environment, not to mention the loss of biodiversity, night skies, flood run off etc.

I noted from the many hundreds of pages of plan documents reference to discussions with gas companies. This at a time when we should be fully considering renewable energy sources as opposed to fossil fuels. This again appears to fly in the face of other government initiatives.

Renewable energy and destructive infrastructure are just 2 examples of where the plan is badly thought through. This is then amplified when one of the initial proposals was to situate development close to the A21 corridor meaning better links to existing infrastructure and the other benefits this would bring.

The main argument for development appears to be a single landowner ready to cash in. This is lazy planning and such a legacy would be an unfortunate legacy for all involved if it went ahead.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
---	---	--

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:	Yes, I wish to be notified of future stages of the Local Plan
--	---

Comment

Consultee	Lorna Veale [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lorna Veale [REDACTED]
Comment ID	PSLP_1185
Response Date	04/06/21 08:55
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	Lorna Veale
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I write again, to further object to your plans for the new town in the parish of Capel. You will no doubt have seen the outpouring of objection to this development with all the letters and documents that have been sent over.

It seems incredible to the residents of this area that our elective representatives have continued down the route of approval for the new town.

We bring, again, to your attention the very real concerns about further risk of flooding to our area, challenges with traffic on very fast and narrow roads and most importantly the destruction of a vast swathe of land in the green belt. Tudeley new town has been sighted on a very high piece of ground which will mean changing the far-reaching views for miles around. Currently this area of the landscape is punctuated by historic farmsteads which, if the proposals go ahead, will for ever be islands within a broader urban sprawl. It has been seen in other areas, that where developments like this occur, these farmsteads and historic buildings will fall into disuse and potentially disrepair. Leaving, in time, a blot on the landscape and a permanent loss of our historic environment.

The new bypass which will cut through land near Five Oak Green finishes up outside the local primary school. The parents regularly park on the current main road and so questions about the safety of the children are paramount when considering this proposal.

Another huge issue we have in this area is the education of a secondary school aged children. There is a huge local wish - to virtual fever pitch with multiple tutors employed, appeal processes etc - for parents to get their children into the grammar school system. This overarching ambition of local parents leads to many people moving to the area to take advantage of these lauded schools and despite the developers intention to build a new secondary school within the new town, it is obvious that parents will want to get their children into the grammar schools in Tonbridge and Tunbridge Wells. The traffic to reach the schools every morning puts huge pressure on the local roads already. By 8am traffic is already backing up to the new Tudeley town area and queuing all the way into Tonbridge and Tunbridge Wells. This has never been a problem for decades as I attended school in the area in 1980s and we crawled through traffic in our school bus then.

Put simply, I would ask that your legacy is not to approve this new town but to take a braver stance and look for alternative solutions. This new town will no doubt be a blot on a stunning landscape. Finally, and of particular concern, are conversations I had with councillors at the time of a recent council meeting when they voted for this new development. I was distressed to learn that some councillors were voting for it simply because it meant that they wouldn't then need development in their own wards. This surely isn't good due process as they were effectively being NIMBYs within their own council community. That is to say they did Not feel that this was a good plan or a plan with any merit, but that it simply mean their constituents would not have to deal with the concerns and issues that our parish is facing. This is not good for community spirit meaning that parishes are effectively fighting with each other to manage the future sustainable development of their own areas.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	David Vincent [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Vincent [REDACTED]
Comment ID	PSLP_907
Response Date	02/06/21 11:40
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	David Vincent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3 Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . Yes, I wish to participate in hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Destroying green belt land, removing farming and flood plans purely for commercial gain of the developers seems at odds with Govt policy and will have a huge detrimental impact on the local community - it can't be seen as sound.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- . Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	jenny vincent [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	jenny vincent [REDACTED]
Comment ID	PSLP_1213
Response Date	04/06/21 12:01
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Jenny Vincent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Five Oak Green since 2004 and moved into the village newly married with my Husband. It is an lovely small community surrounded by amazing countryside that us and locals enjoy. We now have 2 daughters now 12 & 9 who also love their village location, they both attended the local Capel Primary and my eldest is now at Weald Grammar in Tonbridge. One of our favourite walks as a family is over the fields to the Poacher & Partridge for Lunch. This 50 minute walk will effectively be ruined by the proposed plan. How can a AONOB be ruined by a the plan deciding to place over 50% of its housing location in one small ward on the borders with Tonbridge. As I said our daughter now attends school in Tonbridge 3 miles away. The rush hour traffic (outside of covid restrictions) sees the traffic levels more than doubling the journey time for this short distance and it is not uncommon for the traffic jam to tailback right to FIVE OAK GREEN to the primary school. How can a proposal putting 4,000 houses into 1 location not have any impact on an area. Tonbridge & surrounding areas will just completely ground to a halt with over 4,000 extra cars on the roads. The parish will increase 500% in size and the infrastructure to supposedly help with the traffic (additional roads concreting yet more local fields/ local countryside) will never be in place before the volume of new houses are built. One proposed road would mean concreting farmers field which are home to cows & crops. My daughters have especially loved watching the different crops grow over lockdown and even written to local farmers and become friends with them and even been allowed to name the new calf's after showing such an interest. All this will be lost. With regards to infrastructure I am concerned also as to how sewerage system will cope with the 500% increase in homes in the area. It struggles to cope at the best of times and over the last few years Paddock wood have had sewerage collapses from the strain of new homes built in the area where with infrastructure not considered first. The water companies may suggest wonderful plans but will they be in place before any vast scale of building went ahead? I could continue on much more infrastructure problems, school oversubscriptions in the area as new primary & secondary schools will not be built again until xx amount of houses are built and places in the area are already oversubscribed. With 25+ years to build the housing to this scale you can see that the local problems will get far worse with not infrastructure happening before the plans start. Flooding is also another big issue for the proposed areas. The parish has suffered local flooding in recent years with excess water coming off of the fields that are proposed to be built on. Concreting these areas is just going to exacerbate these problems for the new homes and surrounding areas. How is this a plausible plan? Finally the local wildlife will be dramatically affected. We have seen recently on walks so many animals my daughters have never seen before, lizards, multiple butterflies, buzzards, herons and these are just to name a few. There will be so many animal habitats affected by this vast proposal. Why could the plan not see other brown sites be considered including the Castlefield's area to reduce the impact of the whole are being placed on the boroughs boundary where it is out of site out of mind for the other 19 wards. The proposed housing needs (to which are questionable on them being the realistic 'true' figures) need to be spread amongst the ward in the borough and greatly reduce the size of the proposal in Tudeley. I am concerned that the supposed housing allowance for 'local people ' in these figures will never be truly met when greedy developers put a price tag on them. I can see my daughter's who love this are will never get to bring their families up in this area as it will be too expensive to live and who would want to live in a concrete city?

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I have lived in Five Oak Green since 2004 and moved into the village newly married with my Husband. It is an lovely small community surrounded by amazing countryside that us and locals enjoy. We now have 2 daughters now 12 & 9 who also love their village location, they both attended the local Capel Primary and my eldest is now at Weald Grammar in Tonbridge. One of our favourite walks as a family is over the fields to the Poacher & Partridge for Lunch. This 50 minute walk will effectively be ruined by the proposed plan. How can a AONOB be ruined by a the plan deciding to place over 50% of its housing location in one small ward on the borders with Tonbridge. As I said our daughter now attends school in Tonbridge 3 miles away. The rush hour traffic (outside of covid restrictions) sees the traffic levels more than doubling the journey time for this short distance and it is not uncommon for the traffic jam to tailback right to FIVE OAK GREEN to the primary school. How can a proposal putting 4,000 houses into 1 location not have any impact on an area. Tonbridge & surrounding areas will just completely ground to a halt with over 4,000 extra cars on the roads. The parish will increase 500% in size and the infrastructure to supposedly help with the traffic (additional roads concreting yet more local fields/ local countryside) will never be in place before the volume of new houses are built. One proposed road would mean concreting farmers field which are home to cows & crops. My daughters have especially loved watching the different crops grow over lockdown and even written to local farmers and become friends with them and even been allowed to name the new calf's after showing such an interest. All this will be lost. With regards to infrastructure I am concerned also as to how sewerage system will cope with the 500% increase in homes in the area. It struggles to cope at the best of times and over the last few years Paddock wood have had sewerage collapses from the strain of new homes built in the area where with infrastructure not considered first. The water companies may suggest wonderful plans but will they be in place before any vast scale of building went ahead? I could continue on much more infrastructure problems, school oversubscriptions in the area as new primary & secondary schools will not be built again until xx amount of houses are built and places in the area are already oversubscribed. With 25+ years to build the housing to this scale you can see that the local problems will get far worse with not infrastructure happening before the plans start. Flooding is also another big issue for the proposed areas. The parish has suffered local flooding in recent years with excess water coming off of the fields that are proposed to be built on. Concreting these areas is just going to exacerbate these problems for the new homes and surrounding areas. How is this a plausible plan?

Why have other suitable sites not been considered within the borough?. there are other suitable brownfield sites that should be considered and haven't within the borough, there are now empty office buildings, such as AXA that are for sale, also the old cinema site and the main one at Castlefields site that have suitable land that is not an AONOB. I understand that there is a housing need but not to this level and certainly not to this scale in one area. If Tudeley is to be considered, if numbers are not met in other suitable locations, then this must be as an absolute minimum distribution to the greenbelt in terms of size and scale

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

Please come and visit our area when reviewing this plan and walk the areas to see how vast the scale and destruction will be to a local small ward of the borough. This needs to be considered in person to see the flaws in the plan not just looking at it on paper .
Thank you for your time in considering my response

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Anne Waddingham [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Anne Waddingham [REDACTED]
Comment ID	PSLP_1260
Response Date	04/06/21 12:25
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Anne Waddingham
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I am a resident of Golden Green, not far from the proposed new housing development at Tudeley (Policy STR/SS 3). I have lived here for 24 years. Our son attended Skinners School.

One of the crucial deciding factors in my decision to buy here was the fact that the house was built on the brownfield site of an old factory and no countryside was destroyed.

I walk extensively in the countryside around Golden Green and am particularly concerned with promoting biodiversity, being a member of several conservation organisations. I have won two Silver Awards for my wildlife garden in the Kent Wildlife Trust's Wildlife Garden annual awards. I have also conducted annual bird surveys locally for the British Trust for Ornithology for the past 15 years.

My objections to "The Strategy for Tudeley Village" (Policy STR/SS 3) are as follows.

- 1 Creating the proposed garden settlement at Tudeley will cause immense habitat destruction and be detrimental to residents of the Parish of Capel and Tonbridge. Green Belt woodland, hedgerows, meadows and farmland must be protected. Flora and fauna that is very special to the area will be destroyed or displaced, including rare species. We are very fortunate in this area to still have turtle doves, nightingales and cuckoos, species that are declining at an alarming rate. (See *State of Nature 2019* report <https://nbn.org.uk/stateofnature2019/>). Urbanisation, including road building, was identified as one of the main drivers of decline.
- 2 It has been acknowledged by the government, mental health charities and the scientific community that engaging with nature is beneficial to people with mental ill-health and it can contribute to a reduction in levels of anxiety, stress, and depression. As our countryside disappears under concrete, where will they go? Many don't have the means or ability to travel distances to national parks or country parks. This necessity for access to nature has been particularly highlighted by the lockdowns during the Covid-19 pandemic.
- 3 Covering farmed fields with houses and roads will make the Medway flood more often and increase flood risk not only in Tudeley but also in Golden Green, East Peckham, Tonbridge and Yalding. Flood risk mitigation and "betterment" could have disastrous consequences for all, as the measures being looked at are based on old data that does not fully consider the impact of climate change.
- 4 Pollution will inevitably occur – air quality will degrade, and noise and light pollution will increase. Most people living in the new garden settlements will drive privately owned cars and the traffic congestion in and around Tonbridge will become totally unacceptable. The proposed closure of Hartlake Road will only exacerbate this.
- 5 People living in Tudeley will use Tonbridge Station for commuting and the increased numbers of passengers on already packed commuter trains from Tonbridge Station – already the busiest station in the South East outside London - will be unsustainable. Parking in and around Tonbridge Station will be even more difficult. Network Rail have confirmed that a station at Tudeley is not viable at present and so will not be built in this plan period.

- 6 The costs of infrastructure on the Tonbridge & Malling side of the boundary will have to be carried by Tonbridge & Malling residents whilst Tunbridge Wells will receive council tax from the residents in the new dwellings. There will be an increase in pressure on Tonbridge health services, amenities and car parking because residents from the new garden settlement at Tudeley will use Tonbridge as their local town, not Tunbridge Wells, because Tonbridge is much closer and hence more convenient.
- 7 The housing need calculated by the government is based on erroneous and out-of-date calculations. Recent ONS figures show that population growth in the borough is slowing and does not take into account the effect of Brexit.
- 8 Finally, on a warm day last summer, I sat in the churchyard of All Saint's Church in Tudeley. The peace and quiet and the wonderful bucolic views were a balm to the soul. When it's surrounded by houses and busy roads, who will count the cost of what we have lost?

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Sean Waddingham [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Sean Waddingham [REDACTED]
Comment ID	PSLP_1256
Response Date	04/06/21 12:48
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Sean Waddingham
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

As a resident in Golden Green for over 20 years and living in the area supported by TMBC I strongly feel that the proposed development of Tudeley village is an ill thought-out and poorly considered attempt to plant an unsupported mass of housing on the very boundary of TWBC's area where it will depend and overstress Tonbridge's resources whilst contributing revenue to Tunbridge Wells' coffers. I do not consider there has been adequate effort in the "duty to co-operate".

At a time when Government policy is supposed to be above "levelling up" development across England the reinforcement of the natural economic attractiveness of the South-East by eroding the protection afforded by the "Green Belt" policy to allow large scale housing development, is surely insupportable. Protection under the Green Belt policy should not be waived for convenience. The current plan is based on obsolete information and policies, and should be rejected as unsound as it fails to comply with current national policies.

The Tudeley site is separated from any existing employment opportunities, and the nearest are all located in Tonbridge, since the proposed site is as far as possible from Tunbridge Wells central, creating huge pressure on local transport infrastructure. It may well be that a considerable part of the employed population will be London commuters, needing to use Tonbridge station which is already overstressed at rush hours, as it already has a large catchment area. None of the required infrastructure for employment, education and commercial activity is included in the plan, which is a "dormitory development" relying on an adjacent authority for all its support measures.

The creation of a huge new rainfall run-off paved area at Tudeley instead of remaining productive, absorbent farming land, and which can only exacerbate existing flooding problems downstream of the Leigh Barrier is incompatible with policy. New expenditure planned to enhance the Leigh Barrier's protection for Yalding and other potentially flooded areas including my own home at Golden Green will be wasted if a new source of run-off is created outflanking this defence.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?	.	No, I do not wish to participate in examination hearing session(s)
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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Gail Watson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Gail Watson [REDACTED]
Comment ID	PSLP_395
Response Date	25/05/21 16:17
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Mrs Gail Watson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3 Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

.	It is not effective
.	It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

I have lived in Capel for more than 20 years, having moved to the area from Sevenoaks because of the peaceful countryside and to get away from traffic congestion and a built up area. We live on the outskirts of Five Oak Green and will be directly affected by the proposed link road which will run from Capel Primary School immediately in front of our house.

Since moving to the area the road traffic has become more of a problem, with cars racing down Church Lane and along the main road in Five Oak Green, where it is amazing that there have not been serious fatalities. There are times each day when we cannot go out by car because of cars parked on both sides of Church Lane, during term time. Occasional mobile speed cameras have no effect. Even today there are times when there are lengthy delays to get to/from Tonbridge because of the hold ups near the Somerhill schools, and having TGV next door will make this even worse. The area around the FOG shop is already very dangerous, with traffic constantly passing and no easy parking, with cars parked all around the green and on pavements and delivery lorries making it impossible to pass at certain times of the day. Increased traffic volumes will make all of this considerably worse.

The building plans are totally out of proportion to the local area, meaning that Capel will be swamped by a huge number of houses nearby. It is currently very difficult to get a doctor's appointment, meaning that thousands of families will be joining already stretched surgeries. There will be a similar knock on effect in respect of all other local services and transport.

The plans for the land East of Capel and surrounding Paddock Wood, together with TGV will almost all be built on farmland to the benefit of one already wealthy individual, and will make life a lot easier for TWBC as there is only one landowner to deal with. It was only a few years ago that TWBC turned down a modest planning application from the Poacher and Partridge pub saying that this would spoil the surrounding countryside, yet the same individuals are now happy to build 4000 houses literally next door.

The current proposals have taken no regard to alternative sites proposed, such as the Castle Hill proposal. Equally no consideration has been made to scaling down the proposals to a more manageable level. As such, I feel that the public consultation is a tick box exercise and a sham.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No serious consideration has been given to other sites such as Castle Hill and a smaller TGV.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To make my views known

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Jon Webber ([REDACTED])
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Jon Webber ([REDACTED])
Comment ID	PSLP_2262
Response Date	04/06/21 09:04
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Jon Webber
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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Please accept this email as my formal objection to the plans to build the additional houses at Tudeley.
Regards, Jonathan Webber.

Objections to Capel plan

The Capel plan is ill conceived and is very likely, based on past experience, to be poorly executed.

The Capel plan is ill conceived for the following reasons:

1. The infrastructure in terms of roads, trains and other transport is insufficient to meet the needs of the current users, let alone a significant increase:
 - a. The B2017 is backed up for well over a mile most mornings between 8-9am from Somerhill up to and beyond Alders Road, and then along the road leading to the A21. Hartlake Road is insufficient for today's traffic, let alone the increased level and is constrained in terms of width by existing properties and the bridges, including the main line railway bridge. The updated proposal suggesting that Hartlake road is permanently closed will cause even more stress for local residents.
 - b. In pre-COVID times – and for our future of commuting, the trains from Tonbridge were already frequently overcrowded and standing room only and there is insufficient parking at the station to cope, leading to residential streets being clogged up
 - c. There is a real lack of decent secondary school places in the area and whilst I applaud your decision to build another school, it's position in terms of transport can only be described as woeful
 - d. The doctors surgeries are overflowing and are unable to cope with the existing patients that they have today. It is not possible to get a telephone appointment for a non-urgent case – as determined by the patient and therefore likely wrong – within one month
2. Flooding in the area is a real concern and you are deliberately putting residents in Hildenborough, Tonbridge and Yalding in higher risk of flooding
 - a. Hartlake Road is a flood plain and is managed, particularly during winter months with these towns in mind. By concreting over the local fields immediately adjacent and the hills that naturally run into the flood plain is a ridiculous idea creating higher water levels and creating danger for the housing already on the Hartlake Road itself
 - b. More of the gravel pits have been recently excavated suggested that there is a real lack of joined up thinking here; where exactly do you expect the water to go?
 - c. There seems to be a real lack of forethought regards water management as a result of “new town” Capel and I have yet to see any plans in this regard
3. Regeneration of Tonbridge may be seen as a result of these plans, although it is doubtful that this even features as a valid concern for Tunbridge Wells council. If regeneration is a thought here, then the “new town” will singly fail to provide an answer
 - a. The “new town” is in the wrong place and it's distance from Tonbridge will not provide easy access without additional buses along a congested road (see 1a)
 - b. The residents are most likely to see Tonbridge as a train station stop rather than a town in its own right and merely clog up the roads in parking (see 1b) creating resentment rather than regeneration
4. The location of the “new town” is utterly beautiful. Unlike Kings Hill, which was an old airfield, the fields surrounding Capel provide fresh air, walks and enjoyment not just for the local residents but

many from the wider area. COVID saw a huge increase to the numbers of people who have enjoyed the countryside. The views up to and from the hillside by Tudeley church provide huge well-being benefits which once lost will never be replaced

5. The local residents strongly object for a number of reasons. They have chosen to live outside of towns and find themselves being subjected to this issues of towns such as Tunbridge Wells, without much interest or limited and apathetic consultation merely for the wealth benefits of a few local, and likely wealthy landowners. There is a sensible alternative overcoming many of the transport issues linked above, namely Castle Hill.

The plan is, in my opinion, likely to be poorly executed for the following reasons:

- 1 Tunbridge Wells Borough Council have a long and poor history of infrastructure management. Tunbridge Wells itself has been clogged with traffic for well over 50 years with few access roads into and out of the town. In the past 50 years, this has not stopped the council enabling infills for additional housing in multiple locations around the town. Forest Road is a typical example of a residential road which used to have circa ½ the current residents and was much easier to get through. I have frequently travelled half of the distance of the M25 in a shorter time than I've got from one side of Tunbridge Wells to the other
- 2 Tunbridge Wells Borough Council is, in effect, outsourcing it's responsibility to the very edge of its district. In other words, having messed up the main town, it is now failing to learn from its infrastructure mistakes and looking to create the same traffic issues in Capel/Tudeley. By placing the town at the very edge of its border, it is adopting an "out of sight, out of mind mentality" whilst still collecting council tax, but really making amenities the responsibility of others
- 3 There seems to be a real disconnect between the building of multiple houses and the infrastructure. The building itself will create huge logistical issues for lorries, builders even before the level of traffic created by the residents increases significantly. If you are serious about this plan – and refuse to contemplate others – then you need to create a proper road network before any house building actually starts. This means building new roads between the site and directly to the A21, not repurposing the existing roads and hoping for the best
- 4 There were multiple advantages to the Kings Hill site, not least being a brownfield site, that are not repeatable for the chosen site for Capel. It did not create 97% objection from the existing residents because it had a decent road network which could be accessed, schools, doctors etc., were part of the plan and were defined within the body of the town itself.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

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If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box. Not Stated

Comment

Consultee	Kate Webber [REDACTED]
Email Address	[REDACTED]
Address	- Golden Green -
Event Name	Pre-Submission Local Plan
Comment by	Kate Webber [REDACTED]
Comment ID	PSLP_732
Response Date	01/06/21 08:44
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.7
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Kate Webber
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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For office use only

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Comment

Consultee	Nicola Gibb [REDACTED]
Email Address	[REDACTED]
Company / Organisation	West Peckham Parish Council
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	West Peckham Parish Council [REDACTED] [REDACTED]
Comment ID	PSLP_1115
Response Date	03/06/21 15:20
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	West Peckham Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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This submission is from West Peckham Parish Council on behalf of the residents of West Peckham, a small village on the east side of Tonbridge and Malling Borough.

TWBC wish to put very a major housing allocation adjacent to the border with Tonbridge and Malling Borough Council area. This will have major effects on the local road and rail infrastructure for the residents of the local parishes. No mitigation of the effects are planned.

We are concerned that the proposed development will generate significant traffic on the roads connecting to the M20 as the limited junction between the A21 and the M26 does not encourage eastbound traffic to travel via the A21.

The B2016, Seven Mile Lane, already carries a heavy and increasing traffic load as does the A228, Kings Hill, currently making it difficult to leave West Peckham village across the dangerous junctions. The increase in traffic due to the proposed major development will increase the likelihood of serious accident at the Seven Mile Road crossroad with Mereworth Road, adjacent to Mereworth Primary School and at the junction with The Street and the A228.

Many local residents commute to London and the trains at Tonbridge are already full. The increase in numbers of commuters getting on at Paddock Wood will make these crowded trains unusable, potentially causing more people to travel by car.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

. No, I do not wish to participate in examination hearing session(s)

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

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Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Marji Whale [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED], Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Marji Whale [REDACTED]
Comment ID	PSLP_1919
Response Date	04/06/21 11:49
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Mari Whale
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy STR/SS 3 The Strategy for Tudeley Village

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

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I totally object to the building Scheme that has been proposed for Tudeley, Capel and the areas beyond, bordering Tonbridge Town. No infrastructure is in place to support this massive development and Tonbridge will bear the brunt of this, more so than Tunbridge Wells.

The Scheme is beyond belief and totally not viable for our small country villages and our Tonbridge Town, which will be forever destroyed by the immense impact of such a Scheme. The traffic situation is already out of hand and, therefore, any building of this size planned, should be scrapped, immediately.

Tonbridge Town is already overcrowded by people with traffic hold up's everywhere, there is no justification for a Scheme of this size. Tunbridge Wells council is totally out of order to overstretch this part of Kent.

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Comment

Consultee	David Wildman [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	David Wildman [REDACTED]
Comment ID	PSLP_148
Response Date	16/05/21 17:14
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	David Wildman
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS 3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know
Question 4a	

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

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I live adjacent to the A228 on the outskirts of Pembury. The area covered by the proposed development is therefore at some distance from the place where I live. although I do walk and otherwise visit and pass through that area frequently. Even though I do not live there, I feel strongly that the proposed development would destroy both the recreational value of significant areas of Green Belt, and also the character of a large area of immense charm that presently is enjoyed by far more people than just those who live close to the proposed development.

The local road infrastructure is already overloaded and certainly not capable of supporting 4000+ new homes from developments proposed for Tudeley and East Capel. In particular the A228 and the A264 will not support extra traffic into and out of Tunbridge Wells town centre. The A264 is already almost impassible at peak times. The A228 carries a great deal of ambulance traffic between Tunbridge Wells and Maidstone hospitals. I live adjacent to the A228, and already find it difficult and dangerous to join the road.

A station at Tudeley seems unlikely as an option to relieve pressure on road transport, but it is difficult to see how additional parking could be provided at either Paddock Wood or Tonbridge Stations where parking is already difficult.

The proposed development falls entirely within the Green Belt and an area considerably larger than the proposed development will inevitably be blighted. Associated necessary infrastructure such as new or wider roads will cause further blight. Other current infrastructure including schools, hospitals, libraries, gyms and other recreational facilities etc will be overloaded, and addition of new facilities will further blight the countryside.

The development itself would fall entirely within the Green Belt and would result in almost continuous development from Paddock Wood to Tonbridge. Apart from direct destruction of Green Belt on which the development would stand, it would serve to break apart two Green Belt areas thus substantially increasing its destructive effect.

Question 6

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question

5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not believe the proposed development is capable of modification that would make it acceptable

Question 7

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If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

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Comment

Consultee	Julian Wilson [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Julian Wilson [REDACTED]
Comment ID	PSLP_1808
Response Date	04/06/21 16:03
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Julian Wilson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
STR/SS3 and STR/PW1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	Don't know
Complies with the Duty to Cooperate	Don't know
Question 4a	

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As a resident of Tonbridge I feel justified in raising my concerns about proposals in the Tunbridge Wells Borough Council area. Firstly the area is effectively a single area for employment, housing, retail and entertainment (I myself have in the past both lived and worked in Tunbridge Wells and often go there for entertainment and shopping). Secondly the proposals will have a very significant impact on Tonbridge, especially as the proposed 'garden village' at Tudeley will increase the amount of traffic in my town.

The wrong housing in the wrong place and the climate emergency

Unfortunately the construction of large numbers of homes based on building what is profitable will do nothing to bring down the cost of housing. Indeed there have been reports of buyers in the United States and China looking at purchasing new-build homes in Tunbridge Wells Borough for investment purposes, as well as an ever-growing buy-to-let sector fuelled by government policies. However things could be improved significantly were a much higher minimum density per hectare adopted. As the CPRE has noted, some developments would provide less than 15 homes a hectare. Setting a minimum for all sites of 30 homes a hectare – and much higher in or adjacent to larger settlements - would halve the amount of land required and bring the cost per home down. It is also clear that low-density 'executive-style' homes lock in car – and therefore carbon – dependency and are insufficient to support local businesses and services. In July 2019 Tunbridge Wells declared a climate emergency and any new housing or commercial developments should be forced to show how they will decrease the amount of carbon emitted, something which must include a shift from personal motorised transport to public and active transport. It is also worth noting that there is increasing concern about the effect on health of emissions of particulates from braking, which may be an even more significant issue with electric cars than petrol and diesel ones.

Route for future transport infrastructure at Paddock Wood and Capel – STR/SS3 and STR/PW1

Tunbridge Wells (town) is very poorly connected by rail to most of Kent, as has been acknowledged by Network Rail. There is a UK-wide acknowledgment that railways are becoming an ever-more significant part of our transport infrastructure and for many journeys are a better option than buses. Unfortunately there is limited scope to increase the number of trains on the railways in West Kent, due to capacity constraints such as the number of platforms at Tunbridge Wells and Tonbridge stations, the single-track tunnels between Tonbridge and Hastings and the pattern of fast and stopping services between Tonbridge and Orpington. There are, however, serious proposals to reinstate rail services between Tunbridge Wells, Lewes and Brighton and to improve Medway Valley Line services.

In the longer term (albeit many decades) it would be advantageous to directly link a future Brighton to Tunbridge Wells service with the existing Paddock Wood to Strood service, thereby avoiding a reversal at Tonbridge and the heavily congested existing Tunbridge Wells to Tonbridge section of line. However the proposals for Paddock Wood West and Capel Garden Village as they stand would impede this as they would lead to development of the most logical route for such a railway (which would run above ground between Paddock Wood and Five Oak Green before entering tunnelled sections for the remaining route beneath Pembury and Tunbridge Wells).

As the existing railways in our area have in several cases been in continuous use for 175 years it is clear that their planning should be for the longer term. Such a scheme would perhaps not be viable for many decades (although any significant expansion of Paddock Wood would make it more pressing), it would be logical to identify such a route and protect it from development. Many proposals to either reopen or to construct new railway lines have foundered on the fact that development has taken place on the optimum alignment, something which is causing very significant cost increases for the ongoing East – West Rail programme to the East of Cambridge and elsewhere. A relatively small amount of protected land would avoid the need for expensive and disruptive demolition.

Council housing

The clearest way to actually address the shortage of affordable homes is by Tunbridge Wells Borough Council again becoming a significant landlord. High quality modern council estates, such as the award-winning Goldsmiths Street development in Norwich, provide excellent homes at a level of rent affordable to those living and working in the local community. Any council-owned land which has been identified for sale to developers could be used to build similar housing to meet the needs of the local community.

Tudeley Garden Village – STR/SS 3

This proposal, while exceptionally profitable for the Hadlow Estate, should be rejected. Many of the points about car dependency and low density apply quite clearly to this. Housing in Tudeley and Capel is much more expensive than in much of the borough and the unspecified proportion of ‘affordable’ housing may therefore be more expensive than the average home in Tunbridge Wells, Tonbridge and Paddock Wood. There is no serious detail about how the ‘promotion’ of walking and cycling is to be enforced but short of a complete ban on motor vehicles it seems likely that the overwhelming majority of trips to neighbouring towns will be by car, something made even more significant by the apparent failure to include a railway station or frequent new shuttle bus service. Indeed this is admitted in the plan by recognising that this development will require the construction of a new bypass. It is also concerning to see the idea that the prejudices of the Prince of Wales about architecture are to be the guiding principles behind the aesthetics of the development. Their application at Poundbury, near Dorchester, has rightly been condemned by architects.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ms Bridget Fox [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Kempton Way Grantham NG31 6LL
Event Name	Pre-Submission Local Plan
Comment by	Woodland Trust [REDACTED]
Comment ID	PSLP_1420
Response Date	04/06/21 16:31
Consultation Point	Policy STR/SS 3 The Strategy for Tudeley Village (View)
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Woodland Trust
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS 3 The Strategy for Tudeley Village	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know

Is sound

No

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Woodland Trust does not take a position on the creation of new settlements on greenfield sites per se. We are however concerned about the inclusion of ancient woodland in this site, risking the protection afforded this vital habitat in the NPPF and reflected in the draft local plan policy EN13.

Ancient woodland is a precious habitat that should be protected and managed in a sustainable way to maximise its wildlife, landscape and historical value. Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. Ancient woods are important reservoirs of biodiversity, but already highly fragmented, so that they and their associated wildlife are particularly vulnerable to encroachment from development. Further details on the necessary protection for ancient woodland can be found in the Woodland Trust's Planners Manual for Ancient Woodland (2nd edition 2019).

<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>

Existing and emerging national policy requires not only the protection of existing habitats but their enhancement and extension. Policies for biodiversity net gain and nature recovery cannot be delivered if irreplaceable ancient woodland is eroded.

The Tudeley Village site includes the following areas of ancient woodland:• Unnamed ASNW at TQ62844531• Unnamed ASNW at TQ63184518• Unnamed ASNW at TQ63524535• Unnamed ASNW at TQ62124555

We note and welcome the proposal in EN13 to assume a 25m buffer zone for ancient woodland. However, given the scale of development proposed at Tudeley Village, we feel that a larger buffer is required to secure the necessary legal protection for the ancient woodland.

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We recommend redrawing the site boundaries to exclude areas of ancient woodland from land allocated for development.

Whether the ancient woodland is within or outside the development site, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Buffer zones can form part of the accessible natural green space required for future residents.

This will improve compliance with national policy by protecting the ancient woodland from loss or fragmentation and from harmful effects of pollution or encroachment on root areas. It will also make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Woodland Trust is the UK's leading woodland conservation charity with specific expertise on the management and protection of ancient woodland.

Comment

Consultee	Lawrence Matthews [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Pembury [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lawrence Matthews [REDACTED]
Comment ID	PSLP_275
Response Date	22/05/21 17:51
Consultation Point	Map 31 Site Layout Plan (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Lawrence Matthews
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy STR/SS3.Strategy for a new Garden Village in Tudeley.Map31 5.199 to end	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Most submissions under Regulation 18 were ignored by Council. The development is totally against the wishes of local Residents. There was little co-operation by the Council to provide timely plans for review. There was also a reluctance to engage with Tonbridge Council who do not want this Development on their border, for numerous reasons.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The Vision must have been written by a PR Company, and is an insult to Resident intelligence. It could not possibly be self contained. The infrastructure would not be there. How could it be inspired by the Princes Foundation approach? Its two miles from Tonbridge. A walkable community? People would use their Cars, Vans etc. The Roads around the area are already grid locked. This would just increase the problem. The Masterplan makes provision for a Railway station. BR have already stated that it would never happen. There is mention of a centre to include retail, employment and commercial services. The major Stores, Super Markets have already said that the size of the Development would not be sufficient to warrant their stores. There is mention of a new drainage system. It is currently Farmland. The cost of these new services and infrastructure would be enormous starting from scratch. It is not suited on so many reasons. This includes the following.

INFRASTRUCTURE
TRANSPORT
POLLUTION. NOISE , LIGHT AND CO2 EMISSIONS
WATER AND SEWERAGE
FLOOD RISK

ENVIRONMENTAL CONCERNS. Do we really have to take an area out of the greenbelt? We need to be taking steps to keep urban sprawl to a minimum.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_19

Comment

Consultee	Reverend Dr Jeremy Ive [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Capel United Church (Church of England and United Reformed Church)
Address	[REDACTED] [REDACTED] TONBRIDGE [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Capel United Church (Church of England and United Reformed Church) [REDACTED]
Comment ID	PSLP_263
Response Date	02/06/21 16:42
Consultation Point	Map 32 Tudeley Village Plan (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	TWBC submission All Saints' Tudeley -- Regulation 19.pdf (2) TWBC submission All Saints' Tudeley - Regulation 19_redacted.pdf
Question 1	
Respondent's Name and/or Organisation	Revd Dr Jeremy G A Ive, Vicar of Tudeley, Capel and Five Oak Green within Capel United Church (Church of England and United Reformed Church)
Question 2	
Agent's Name and Organisation (if applicable)	N/A
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Map 32 Tudeley Village Plan

Question 4

Do you consider that the Local Plan:

Is legally compliant Don't know

Is sound Don't know

Complies with the Duty to Cooperate Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Regulation 19 Proposed Representation by the Ecumenical Church Council of Capel United Church to the planned development of Tudeley Village by Hadlow Estate.

Capel United Church (being a Local Ecumenical Partnership between the Church of England and the United Reformed Church) and by the Diocese of Rochester. Members of the church community have a range of views on the proposals and many will express their views through various means, including participation in the formal Regulation 19 consultation exercise which TWBC is running in 2019. For this reason, we shall not be taking a general view on the proposals such as those of Capel Parish Council (q.v).

However, the Ecumenical Church Council has specific areas of concern as was resolved on 2 December 2020 (with subsequent changes to the plan taken into account). The application by the Vicar and Churchwardens to the Regulation 18 process in October and November 2019 is below with additional areas of concern for submission to the Regulation 19 process in March and April 2021 regarding the proposal from Hadlow Estate for the development of the proposed Tudeley Village.

All Saints' Church, Tudeley

All Saints' Church is a mediaeval parish church, lying within the ecclesiastical parish of Tudeley, Capel and Five Oak Green and in the civil parish of Capel. It is in regular use for public worship. What makes it extraordinary is that it houses stained glass windows designed by Marc Chagall, of great beauty and artistic significance, which attract visitors from around the world.

Matters of concern

1.Location: The location of the church in any development would need to be carefully planned, so that the church setting relates well to its environs, rather than being cut off from a new centre of

population. Ideally, All Saints' would be approached by an open precinct, providing a clear focus for the community.

We are glad that this concern has been responded to through the provision of a green between All Saints' Tudeley and the centre of the Village, including the proposed Primary School. However, there is a concern about the proposed housing block to the NE of the church S of the railway line, which will affect its surroundings not least the view N from the churchyard to Greensand Ridge and beyond. This will significantly affect the situation of a building much-beloved internationally. **The Ecumenical Church Council of Capel United Church, therefore, oppose this block of housing, and propose instead that it be turned into parkland, which could also help in the following ways:**

- . **Offset the run-off from the road and church down the slope towards the railway line which might be adversely affected by the new building development perhaps with the provision of more ponds and suitable vegetation to absorb excess water immediately to the S of the railway line;**
- . **provide a preservation area for local biodiversity;**
- . **serve as a 'green lung' and a place of immediate access for the residents of Tudeley Village for quick nature breaks and dog-walking; and**
- . **offset the problem of the massing and density of housing around All Saints' Church at the point which most affects its cherished view and outlook.**

2. Parking: Effective ministry to our congregation and community, as well as the benefit to tourism and the local economy of welcoming visitors to view the Chagall windows or to attend concerts and other events, depends on the availability of sufficient parking for cars and coaches. Two parking areas that are leased by the church from the Hadlow Estate appear to be included within the footprint of the garden village. There is also a risk of the church parking areas being pre-empted by others, should insufficient (or inconvenient) parking be provided within the development. There should be careful consideration as to how suitable parking for the church will be maintained and protected.

There is a concern that the existing additional parking area seems to be no longer designated in the plans.

3. Access: At present, access to All Saints' is along a shared private road, which is in an indifferent state of repair. Should development take place, this may have to change. Certainly, the existing access road cannot easily sustain even the present strain upon it. It may well be that access to All Saints' should be from a different direction, depending on whatever roads were developed for the future. This should not adversely affect access.

The issue of access is more widely affected by the growth in traffic which the new development will cause along the B2017 between Five Oak Green and Tonbridge. **We welcome the plans for a cycle route and walkway to run between Tudeley Village and Tonbridge Station but stress the need for a shuttle service between Five Oak Green and Tonbridge, ideally on its own dedicated route, to offset the pressure of traffic along that section of the B2017.**

4. Security: The church is normally open (and unattended) during daylight hours. Its celebrated stained-glass windows have no physical protection, which would diminish their visual impact. It would be unfortunate if concerns over nuisance, noise, damage, or insurance were to inhibit either of these circumstances. Moreover, the church would need to cover the cost of any security arrangements which would need to be put in place.

The placing of the housing block mentioned in 1. and the increased traffic along the B2017 have bearing on these concerns as well.

Revd Dr Jeremy Ive, Vicar of Tudeley, Capel and Five Oak Green, 27 May 2021

The Vicarage, TN12 6TL [TWBC: telephone number and email address redacted]

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Capel United Church (being a Local Ecumenical Partnership between the Church of England and the United Reformed Church) and by the Diocese of Rochester. Members of the church community have a range of views on the proposals and many will express their views through various means, including participation in the formal Regulation 19 consultation exercise which TWBC is running in 2019. For this reason, we shall not be taking a general view on the proposals such as those of Capel Parish Council (q.v).

However, the Ecumenical Church Council has specific areas of concern as was resolved on 2 December 2020 (with subsequent changes to the plan taken into account). The application by the Vicar and Churchwardens to the Regulation 18 process in October and November 2019 is below with additional areas of concern for submission to the Regulation 19 process in March and April 2021 regarding the proposal from Hadlow Estate for the development of the proposed Tudeley Village.

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Matters of concern

1.Location: The location of the church in any development would need to be carefully planned, so that the church setting relates well to its environs, rather than being cut off from a new centre of population. Ideally, All Saints' would be approached by an open precinct, providing a clear focus for the community.

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- . **provide a preservation area for local biodiversity;**
- . **serve as a 'green lung' and a place of immediate access for the residents of Tudeley Village for quick nature breaks and dog-walking; and**
- . **offset the problem of the massing and density of housing around All Saints' Church at the point which most affects its cherished view and outlook.**

2. Parking: Effective ministry to our congregation and community, as well as the benefit to tourism and the local economy of welcoming visitors to view the Chagall windows or to attend concerts and other events, depends on the availability of sufficient parking for cars and coaches. Two parking areas that are leased by the church from the Hadlow Estate appear to be included within the footprint of the

garden village. There is also a risk of the church parking areas being pre-empted by others, should insufficient (or inconvenient) parking be provided within the development. There should be careful consideration as to how suitable parking for the church will be maintained and protected.

There is a concern that the existing additional parking area seems to be no longer designated in the plans.

3. Access: At present, access to All Saints' is along a shared private road, which is in an indifferent state of repair. Should development take place, this may have to change. Certainly, the existing access road cannot easily sustain even the present strain upon it. It may well be that access to All Saints' should be from a different direction, depending on whatever roads were developed for the future. This should not adversely affect access.

The issue of access is more widely affected by the growth in traffic which the new development will cause along the B2017 between Five Oak Green and Tonbridge. **We welcome the plans for a cycle route and walkway to run between Tudeley Village and Tonbridge Station but stress the need for a shuttle service between Five Oak Green and Tonbridge, ideally on its own dedicated route, to offset the pressure of traffic along that section of the B2017.**

4.Security: The church is normally open (and unattended) during daylight hours. Its celebrated stained-glass windows have no physical protection, which would diminish their visual impact. It would be unfortunate if concerns over nuisance, noise, damage, or insurance were to inhibit either of these circumstances. Moreover, the church would need to cover the cost of any security arrangements which would need to be put in place.

The placing of the housing block mentioned in 1. and the increased traffic along the B2017 have bearing on these concerns as well.

Revd Dr Jeremy Ive, Vicar of Tudeley, Capel and Five Oak Green, 27 May 2021

The Vicarage, TN12 6TL [TWBC: telephone number and email address redacted]

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The comments with the supporting diagrams highlighting the areas of the map referred to are in the attached document (q.v.)

If you would like to attach a file in support of your comments, please upload it here. TWBC submission All Saints' Tudeley -- Regulation 19.pdf (2)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Ashley Saunders [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ashley Saunders [REDACTED]
Comment ID	PSLP_1284
Response Date	04/06/21 13:51
Consultation Point	Map 32 Tudeley Village Plan (View)
Status	Processed
Submission Type	Web
Version	0.1

Question 1

Respondent's Name and/or Organisation	Ashley Saunders
---------------------------------------	-----------------

Question 3

To which part of the Local Plan does this representation relate?	Policy
--	--------

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

All

Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	Don't know
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

In addition to what has already been mentioned is that this development includes schools. Many pupils attend schools by public transport and while the public transport network in Tonbridge cannot cope with any more school traffic for safety reasons Tudeley is not the place either. The area is served poorly by busses with the only route via Tonbridge and Paddock wood there would be no viable places to add to new bus routes thus making it difficult for school children to use public transport unless from Tonbridge or Paddock wood which will rule out many travelling by public transport. This will mean a huge increase in car to and from the area for school drop off and pick up.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Schools need to be built in areas served well by public transport which includes bus and train. The schools in Tonbridge show what can be achieved but even Tonbridge is now getting over congested and sometimes dangerous with the high levels of school pupils. Schools need to be spaced out better and with good transport links. This could be better achieved if the eastern part of the borough was developed instead of cramming people into the western corner.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Paul Chalklin [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Paul Chalklin [REDACTED]
Comment ID	PSLP_735
Response Date	01/06/21 10:18
Consultation Point	Map 33 Transport Connections: Tudeley Village (published with the permission of David Lock Associates Ltd) (View)
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Paul Chalklin
Question 3	
To which part of the Local Plan does this representation relate?	Policies Map
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Map 33	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	No
Complies with the Duty to Cooperate	Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not positively prepared

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Link road from proposed Colts Hill Bypass to junction of B2017 and Church Lane

The plan for a new road linking the potential Colts Hill bypass to the junction with the B2017 and Church Lane proposes a junction outside Five Oak Green Infants and Junior school and the proposed Secondary school. This junction will be busy and producing pollution at the junction in close proximity to children, being a primary link between Tunbridge Wells to the proposed Tudeley Village and a link from villages to the east and Tonbridge.

This proposed link road also crosses Sychem Lane with no indication on the plan how this intersection is to be made. This road is very popular with local residents walking in the area. It would appear to just sever the lane.

The proposed link road although to the south of Five Oak Green still passes very close to residential housing and will be a permanent source of noise and light pollution. This road also proposes to cross Green Belt land.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box: Yes, I wish to be notified of future stages of the Local Plan

Comment

Consultee	Mr Ian Bailey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tonbridge & Malling Borough Council
Address	Council Offices Gibson Building WEST MALLING ME19 4LZ
Event Name	Pre-Submission Local Plan
Comment by	Tonbridge & Malling Borough Council [REDACTED] [REDACTED]
Comment ID	PSLP_1503
Response Date	03/06/21 16:26
Consultation Point	Map 33 Transport Connections: Tudeley Village (published with the permission of David Lock Associates Ltd) (View)
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Ian Bailey, Tonbridge & Malling Borough Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Maps 32, 33 and 34 (Policy STR/SS3)

[TWBC: see also representations PSLP_1495 (covering letter whole Plan), PSLP_1496 (Policy STR/SS1), PSLP_1497-1501 (Policy STR/SS3), PSLP_1502 (Policy STR1) and PSLP_1503 (Policy STR/SS3 Maps 33 and 34)].

Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	Yes
Complies with the Duty to Cooperate	Yes

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

There appears to be a mapping error in respect of Map 33 and Map 34, which show the location of the new Secondary School as outside of the Garden Village site boundary, while Map 32 shows the school within the site boundary.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For consistency, the maps should make clear that the site is inside the boundary, as the delivery of the school is now addressed by Policy STR/SS3.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan