

Mrs Teresa Homewood

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Policy

What is the reference number?

Policy STR/SS 1

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

The TWBC revisions relating to Paddock Wood fails to address the Paddock Wood Neighbourhood Plan which was approved by the community in October 2023, with a majority referendum by local residents,. Yet not only has this vote been ignored the new plan extends 2600 into areas of Paddock Wood, that were not allocated previously for development. This is appears to be very underhand by TWBC planning and is gravely concerning. Residents are aware that the success of Save Capel campaign has now forced TWBC to decide on a brand new idea to place 2600 houses, within the same area just outside of the original proposal for the development of Capel. The existing 3 large development sites are still unfinished, there are so many built that are still unsold, despite TWBC assurances that when the sites were passed for planning (despite years of completely legal protests which were dismissed by TWBC and passed anyway) the following would not happen: they have allowed to developers to advertise abroad and sell the affordable housing to Croydon Council. The affordable Retirement apartments at the north of Commercial Road have also been sold by TWBC, it is now a halfway house. The development at Badsell Road should have included a pumping station, this was not built and has now caused multiple burst water mains in the area, causing temporary road closures, sink holes and the complete closure of Ringden Avenue for 7 months to try and accommodate the new houses

An enormous amount of work went into the Paddock Wood plan which seems to have been basically ignored which again is very concerning. The principles of the Neighbourhood plan should reflected throughout any continuing growth strategy should consider this plan

The Borough Council's strategy for Paddock Wood is deeply and completely flawed and not compliant with the National Planning Policy Framework regarding flood risk. Firstly, the main areas for development are on Flood 2 and Flood 3 levels, this would have a complete negative impact on existing residents and the new development proposed. The fact that the plans for new industrial estate being built on Swatlands Farm did not take into consideration the concerns of local residents with regards to this consistent flooding in this area of Paddock Wood. Unfortunately, once Gallaghers started to dig the foundations, within less than 24 hours these foundations were completely flooded. Tunbridge Council choose to build on flood plain farm land instead utilising the empty units on the North Farm Estate. Residents are aware that it was the Maidstone firm Gallaghers that were awarded this contract by TWBC planning, which was rushed through without due care to the flooding issue in Paddock Wood and before the referendum on the Paddock Wood local plan. It is also duly noted that Swatlands Farm is much more convenient for the firm Gallaghers traveling from Maidstone to site - in fact its one of the nearest to Maidstone and one of the last in TWBC jurisdiction. The area where this new development where TWBC have blind sided proposal is within the same Flood Level 3 area we have yet to see the detrimental impact to the environment, with increase in traffic and pollution and the worrying concern to residents with regards to flooding as the existing culverts in Lucks Lane, Maidstone Road and Wagon are already full to capacity, as the new industrial estate is yet to be built.

As residents we have real concerns that this failure to apply the NPPF requirements proves it is not able to deliver a safe and sensible development strategy. There is significant flooding in Paddock Wood, for example Gravelly Stream along the western side. This accepts diverted water from the Tudeley Brook Stream in Five Oak Green which fills the culvert under the railway and then floods areas around Ribston Gardens and Laxton Gardens and up towards Badsell Road. Paddock Wood is therefore already suffering flooding from streams located in Capel Parish. There is no consideration of this issue in the plan. The proposed new development at Queen Street by Redrow/Persimmon (S12.10) plans to develop a new sewage works which will deposit at minimum of 50,000 litres a day into the Rhoden Stream (S12.15 and S12.16). This leads to issues with the culvert under the railway line (East Rhoden Stream) as it has insufficient capacity and if this is improved just pushes the problem onto Queen Street and down stream properties and villages. There is no mention of realistic solutions to deal with this – even before the 37% increase of rainwater mentioned elsewhere. This stream already has increased flow due to the Green Lane and Church Road developments and serious flooding will occur if this level of increase is allowed. Worryingly the Borough Council seem to consider wastewater, freshwater and surface water as one issue which shows a complete lack of understanding of the serious flooding issues Paddock Wood is suffering. All of the above is already causing issues, due to the high water table on the new housing sites in Paddock Wood, they are already experiencing damp problems which seems to show building control are not doing their job correctly. People are buying these properties in good faith only to end up with serious building defects in years to come. With further flooding and building of houses on flood plain land this will eventually create problems with houses being insured. There is no mention of how existing Zone 3 properties South of the railway and North – Lucks and Wagon Lane plus Queen Street flood risk will be mitigated. TWBC proposals do not take into account the 37% additional rainfall from Brenchley, Matfield and development either. Without further development there are already known sewage problems in Paddock Wood and Queen Street which have issues of sewage coming into homes and at times of high rainfall drains overflowing and not being able to flush toilets. Sewage water frequently sprays from the plant at the Lucks Lane plant near Queen Street as far as the bottom of September Cottage. If it is impossible to increase sewage capacity (s11.4 – S11.6) and already services are stretched how can further development be considered? NOT MENTIONED in the report is the 37% increase in expected rainfall brought about by global warming and the impact this will have

on the existing infrastructure never mind new homes. No mention has been made of the rainwater run off from Brenchley and Matfield and its effect to Paddock Wood and developments down stream. This report shows a blatant lack of understanding, at best, of the issues Paddock Wood faces in regards to flooding and there are serious concerns that the infrastructure has not been put in place prior to the building of all these extra houses which will cause problems with effluent management and further flooding.

Paddock Wood town centre has not been included in the Paddock Wood Structure Plan, which is very concerning. This is being overlooked and TWBC are solely focusing on developments around the town without the required investment in order to manage the growth of the area. This means the present facilities are expected to cope with the additional homes proposed. Aside from the lack of basic amenities, without improvement this creates dormitory settlements with associated traffic issues. Dealing with the Town centre as a supplementary paper is disingenuous and not to include it in the local plan a significant missing piece of the jigsaw – so significant that we consider that the revisions are being made in isolation and encouraging a less than joined up approach. People need a welcoming town centre to provide places to socialise, eat out, a range of independent shops and businesses and provide an incentive to walk into town rather than drive to surrounding areas. The omission of the town centre from the local plan is a massive and damaging oversight. The entire plan to deliver increased housing to Paddock Wood must surely be considered in terms of need. The 30 new houses / flats already built in Paddock Wood town centre are remaining empty bar some of the Churchill Retirement complex. To enable these small developments, this has required the demolition of existing premises i.e. Chinese restaurant; fish and chip shop; hairdressing salon; flower shop and police station to be replaced by residential properties that seem to not be selling. There are still a number of houses to be built in the existing developments many of which are being sold outside of the "local area" including London Boroughs and being actively marketed abroad.

The scale is astonishing for a small town with NO associated infrastructure improvements. The developments permitted under the previous Local Plan have added nothing to the town in terms of betterment for local residents and the lack of a cohesive strategy for the existing and planned developments is extremely disappointing.

There are 2600 additional houses planned for Paddock Wood in the near future Paddock Wood has been allocated around 50% of the entire borough. Yet, TWBC reduced our allocated amount by 1000 houses, from 3600, so now they have removed the planned sports hub.

In conclusion

There are limited plans for improvements in infrastructure including roads, rail, buses, GPs, dentists, shops, crime and antisocial behaviour prevention.

The most concerning is the lack of consideration and planning given to the flood area where the new extensive development is to be proposed

The development is not required. The new estates are not selling the quota predicted, Paddock Wood lost its Police Station to new houses, few of which have been sold.

There has been, concerningly, very little discussion with Paddock Wood Town Council with regards to this proposal

No reference has been made about the Paddock Wood Neighbourhood Plan, despite to legally binding referendum of it now being our local "planning document"

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) 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.

Firstly, the most concerning is the lack of consideration and planning given to the flood area where the new extensive development is to be proposed

The development is not required. The new estates are not selling the quota predicted, Paddock Wood lost its Police Station to new houses, none of which have been sold.

The proposal has not in any way been positively prepared for the area, so many considerations that are vital have been ignored. This is another rushed planning proposition by TWBC which has deliberately blindsided Paddock Wood because of the successful campaign of Save Capel.

Why is it only Paddock Wood and Capel considered for this development?

Please use this box for any other comments you wish to make.

This unjustifiable proposal has been deliberately rushed through due to Save Capel's successful campaign, yet it is underhand as it still affects Capel in a detrimental way. TWBC have not conformed with previous developments within Paddock Wood, have ignored flooding problems, traffic, pollution, lack of police presence, anti-social behaviour on the increase

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

Yes, I wish to participate at the examination

If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:

The residents of Paddock Wood should be considered when TWBC keep overriding concerns