

Ms Charlotte Glancy
c/o Banks Solutions,
80 Lavinia Way,
East Preston,
West Sussex,
BN16 1DD

FAO Inspector - Matthew Birkinshaw

Cc: TWBC local plan consultation,
PWTC

23 October 2024

Dear Mr Birkinshaw,

Re: Tunbridge Wells Local Plan Examination

We write in response to your letter of 15 October to residents who submitted responses to the local plan consultation earlier this year.

Your letter provided an update on the Tunbridge Wells Local Plan examination and explained that after the stage 3 hearings in July the Inspector wrote to TWBC asking them to carry out a public consultation on certain additional evidence that had been submitted.

TWBC duly launched a consultation which runs from 11 September to 23 October and provided 20 updated documents against which responses can be made. All of the documents merit thorough consideration but those that impact residents of Paddock Wood are those that particularly concern us.

Although the request to consult the public has been met, we question whether the real views of the public will be heard through this process or if it is the intention of TWBC to conduct this consultation to 'tick the box.' The documents are not easy to read, use technical language and frankly make it too difficult to establish what the key issues are and what impact they will have on the town and residents of Paddock Wood.

We do not have the expertise to provide a reasoned response to issues such as flood mitigation and traffic management. The original local plan promised 'betterment' for Paddock Wood. This has yet to materialise and from what we can glean from the documents there is little detail on how things are likely to improve with, to date, no infrastructure improvements having been delivered as a result of the three developments already in situ despite promises which remain unfulfilled.

We question the absence of any 'plain English' version of the documents published as part of the consultation, which would help the 'man in the street' understand what is at stake. There have been no face-to-face meetings held in Paddock Wood to enable residents to discuss the updated documents with planning officials, and there are certainly no 'easy read' versions of the documents, which would have helped more people understand what is being proposed. The Paddock Wood Neighbourhood Plan barely merits a mention, which emphasises the disconnect between TWBC and the town's residents.

Over the past couple of days, with the deadline for responses looming, a small amount of information has been shared by those better able to scrutinise the documents. Concern has been expressed over the lack of general clarity around the proposals, including the necessary infrastructure improvements and costings. The secondary school and health care provision also lack any real detail, and there are concerns about the way TWBC have conducted the flood assessment, including the 'sequential test' around which there is little detail in terms of the site allocation. It appears that the documents are rich in 'planning speak' and light in meaningful, tangible detail.

We feel that TWBC are unlikely to receive many responses from members of the public to the consultation although this may not be representative of the true feelings in the town. The process

is far too difficult for anyone other than those immersed in planning to grasp. There is little transparency and much hiding behind complicated documents which hide the real impact the proposals for massive development will have on a small town and its residents who feel powerless in the face of TWBC's steamroller approach.

Consultations of this type do not give us a voice but more increase the feeling of despondency and of the whole thing being a 'done deal' over which we have no say.

We realise that the above does not constitute a formal response to the consultation but we intended to bring to your attention that TWBC have made it difficult for residents to contribute. However, we attach an appendix, which reflect the comments that we have assembled from our members

Thank you for your time.

Members of the Stop Overdevelopment of Paddock Wood group
(Number in Facebook Group: 1212)

Attached:
Appendix - representation from Stop Overdevelopment of Paddock Wood group.

Appendix: Stop Overdevelopment of Paddock Wood representations

PS_095 Revised Policy Wording for Policy STRSS 1 – Paddock Wood and Land at East Capel (September 2024).pdf

PS_105-TWBC-Final-Infrastructure-Delivery-Plan-IDP-August-2024.pdf

PS_098 Action Note on Action Point 28 - Local Plan Sequential Test regarding Strategic Allocation Policy STR SS1 Land at Paddock Wood including land at east Capel (September 2024)

The comments/objections are as follows:

The Infrastructure Delivery Plan (IDP) is too vague.

- There is mention of 5-year and 10-year periods but no detail on phasing ie what PW can be clear of having and when that would be.
- There is mention of the number of homes, but not enough detail on infrastructure that would be forthcoming (more detail down below).
- The details on the costs of infrastructure improvements are not clear enough. Only “indicative costs” have been given but more concrete costs are now needed.

Secondary schools:

- TWBC is now focussing on the expansion of Mascalls Academy to allow for the expected increased number of secondary pupils. However, there is only a high-level agreement to this, so it cannot be considered a foregone conclusion.
- The plot allocated for a new secondary school (in North Western parcel) now seems a lower priority. In any case, has KCC agreed to fund this? It is not clear. They are under huge financial pressures, hence why the focus is perhaps now on Mascalls expansion, which would be funded by the Academy itself and developer contributions. But this is still not confirmed.
- If Mascalls expansion were to be agreed to go ahead, what would happen to the northwestern plot allocated for an additional secondary school? The land is in flood zone 2 so cannot have residential housing in it. So what would be the plan for that land?

Section 7 joint working

- The parties are committed to constructive joint working to bring forward and deliver the proposed 3FE expansion to Mascalls Academy. To this end, the parties are committed to stakeholder liaison, in respect of the proposed 3FE expansion to Mascalls Academy, including engaging with Parish Councils, associated Neighbourhood Plan groups and other local groups. How and when is this expected to happen? Nowhere does it mention asking parents in PW. Who are the other local groups mentioned in 7.1, page 24? (From PS_097a Statement of common ground TWBC and KCC August 2024)
- In short, the secondary school provision is still very unclear.

Heath infrastructure:

- Mention is made of new health establishments, but what exactly would be provided is not defined. It is vague.
- The plans suggest separate providers in the East and West of PW but no detail is given as to what exactly they would be providing (eg GPs, dentistry etc)
- Instead, PW would need at least a full new medical centre like Woodlands and another dentist surgery. These should be included in the short-term commitments, as healthcare facilities are already over-subscribed, due to the recent three major development sites.

Flood risk:

- There is no mention of flood risk management and how it intended that future flooding as a result of developments be avoided
- There is no mention of a specific policy for PW and nothing is mentioned in the document regarding western parcel STR/SS1
- TWBC has said that the Environment Agency (EA) has accepted that it is acceptable to develop on the western side of PW (and TWBC has provided a letter to show that). However, flood risk

assessments are not done by EA and should be done by KCC and/or the Upper Medway Drainage Board. Instead, TWBC seems to be doing their own flood risk assessment and relying on EA analysis.

- TWBC was asked by the inspector to explain clearly how they had implemented the “Sequential Test”. This was to explain why some sites for development were identified over others. Specifically, regarding the more flood-prone area to the west of PW:
- In the Local Plan Sequential Test document above, TWBC explained the flow in terms of what they needed to consider
- But they made no mention of what areas were considered and then rejected and what the exact reason for rejection was.
- No flood modelling was included in any of the submitted analysis
- TWBC has therefore not done what the Inspector requested TWBC to do so that residents in PW could be sure that the areas to the west of PW were the only ones available for additional development.
- We believe the two streams, Gravelly Way and Tudeley Brook streams, which are in the area shaded dark blue, have not been addressed.
- We believe that the Council should go further than simply discourage building on flood-risk areas. Building in these areas should not be allowed.

Walking/cycling/connecting routes and access:

- There are separate plans for each parcel but no overarching plan for the whole of PW to allow connection across the whole town.
- People will still revert to using cars when doing their shopping.

Roads:

- There is focus on roads outside PW but no focus and capacity/changes within the town
- There is no detail regarding improvements to roadways/highways in PW.
- Local roads are very congested with traffic. The B2017 to Tonbridge, going through Five Oak Green & Tudeley is very congested in the mornings & evenings, and has a continuous stream of cars. Any car turning right or a lorry stopping causes traffic jams. The B1260 has huge queues in the rush hour at Kippings Cross. What plans are in place for road improvements? If the A228 had improvements & Mooted bypass it might help, but with all of the extra houses, it will be worse. For many of us living in the lanes/roads around Paddock Wood using public transport is not an option.

Waste Treatment plants:

- There is no clarity on how enhanced waste treatment would work if developments are approved
- No land has been identified as available for a new plant and no detail is given as to where a new plan needs to be.
- TWBC refers only to “slight expansion” being needed but this would not be enough given the increased number of homes.

Bus routes:

- New bus route support information is very vague and not tangible enough.

New sports hub:

- No plan is given for a new sports hub building - only outside spaces are provided for.
- PW would need an additional proper hub to provide the full range of sports requirements.

Consultation between TWBC and PWTC:

- The lack of consultation was raised as an issue by PWTC and PW residents at the July hearings.
- There has since only been one meeting between the 2 councils and it took place very recently (18 October 2024).
- There was no clear agenda and no reference was made to the effect of developments on PW town centre.
- There should have been greater transparency and contact between the councils and TWBC should have exercised its duty to consult to a much greater degree.
- There has been little to no reference to the PW Neighbourhood Plan in the documentation. This is important for the issues around Heritage & sports & more generally for issues like travel/ getting around & landscaping the individual sites etc.

Submitted by Sue Lovell,

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[REDACTED] n behalf of Stop Overdevelopment of Paddock Wood Group. Number in membership:
1212.