

# **Local Plan Regulation 19 representations in document order**

## **Comments on Section 5: Place Shaping Policies: Paddock Wood**

## Comment

Consultee	Julie Shrubb [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Julie Shrubb [REDACTED]
Comment ID	PSLP_249
Response Date	21/05/21 13:33
Consultation Point	Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

### Question 1

Respondent's Name and/or Organisation	Julie Shrubb
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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.

5.238, 5.239, 5.256

### 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.**

As stated there is only 1 road in & out of Paddock Wood. This is already busy at peak times. With additional housing/population this will increase. Promised infrastructure has not been put in place.

Paddock Wood is liable to flood as it is on a flood plain. Tonbridge has experienced recent flooding due to over development. The flood barrier does help but the Capel development will add more pressure.

The housing is not affordable. Most young local residents do not earn enough to buy the cheapest of these properties - approximately £255,000 for a 1 bedroom apartment.

### 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 Capel Plan should not go ahead. Paddock Wood needs the High Street (Commercial Road) to be used. A crossing by the library would enable people to cross safely & encourage use. Do not close the railway bridge to all traffic except buses. This will mean a detour to Seven Mile Lane, driving back towards Five Oak Green and back into Paddock Wood for some residents to get to school, doctors, shops etc. There is also an ambulance depot which could mean somebody may lose their life if there is a delay.

### 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

# **Local Plan Regulation 19 representations in document order**

## **Comments on Section 5: Place Shaping Policies: Paddock Wood: Policy STR/PW 1: The Strategy for Paddock Wood**

## Comment

Consultee	Vince Greene [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Vince Greene [REDACTED]
Comment ID	PSLP_136
Response Date	14/05/21 19:33
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Vince 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/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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**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 14 years and have worked here for some of that time. I have a deep love of nature and our need and reliance on it, not only for food production but for biodiversity, pollination and clean air.

I am a ramblor of the countryside and enjoy the physical and mental benefits of walking around Paddock Wood and to nearby villages. The proposed removal of vast tracts of Green Belt would severely impact this essential and national activity, for me and countless others - permanently 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'. 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.

'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 Paddock Wood there would be 'High Harm' to it. I suspect the release of Green Belt land near Tudely Brook Farm on Whetstead Road on Paddock Wood's north west corner has not fulfilled all legal requirements and might have to be reversed. The 'strong barrier' it is said to be creating here is not strong because it is a precedent to further Green Belt release.

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 such as Foal Hurst Wood in Paddock Wood. Some local trees in other parts of the town 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 Plan of Paddock Wood 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. I understand the proposed water attenuation ponds will be part of them but nothing is legally binding yet. I am also worried for the protection of Bluebell Wood in Paddock Wood off Church Road and of the seeming lack of definition between the new building site and the wood and orchard beyond.

Fields used for hops and farming generally are part of our heritage and may be needed again if anything 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.

There is not enough provision for sewage treatment. I have seen the town centre flood very quickly many times as well as other areas of town like Church Road. The town's sewage and rain water run-off is at capacity. Consequently, the amount of potable and washing water needed for mass house building is not attainable. There are recent reports in the media of attenuation ponds in other parts of the country overflowing and of being accidentally contaminated with sewage in times of flooding. The proposed attenuation ponds for Paddock Wood are therefore a possible threat for the transmission of waterborne disease eradicated from the western world in the 19th century. The town also lies at the bottom of a huge regional basin.

I always find it a little unnerving walking through the Paddock Wood east car park as it is invariably full of cars manoeuvring or parked. There is therefore little to no space available for any more cars. The proposed increase in houses means there would be many more people wishing to use the shops, but they will find it very hard if not impossible to park there or anywhere else. They will not find many spaces in Commercial Road (the high street). I always see a traffic jam when I walk through there and the town centre is clearly at traffic capacity.

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 raised above; as would be the case with Capel and Paddock Wood. 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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**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.**

Because the population of the UK and of the borough of Tunbridge Wells is not going to increase at the phenomenal rate proposed to justify the massive development (birth rates are dropping markedly), the government's Standard Calculation for assessing house-building numbers must be used. The added 'c + 26%' figure for 'uncapped' and 'windfall' targets has to be abandoned!

#### **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:**

My alarm at the savage extent of the proposed developments together with my keen understanding of its needless long term detrimental effects, coupled with my deep concern about a fantastic region and it's natural environment make me an invaluable addition to any meetings and consultations. Please consider me for attendance and keep me informed.

#### **Question 8**

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

Reevaluate brownfield site usage and regeneration of existing and vacant properties to significantly reduce housing development impact. Reinvigorating towns is a better long term strategy that is a more common sense approach that generates fewer problems but yields greater dividends for the future. There are a huge number of vacant properties in Tunbridge Wells!

#### **Future Notifications**

**Please let us know if 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_183
Response Date	18/05/21 11:19
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
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 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:	<ul style="list-style-type: none"><li>. It is not positively prepared</li><li>. It is not effective</li><li>. It is not justified</li></ul>
Question 5	

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Not enough Detailed Information given to Residents.

#### Question 6

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No. It is Biased against Paddock Wood & Capel For Dumping 4000 In this Area, But Tunbridge Wells has been Exempt.

#### 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	William Forster [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Capel [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	William Forster [REDACTED]
Comment ID	PSLP_325
Response Date	24/05/21 12:42
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	William 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.**

Policy STR/PW 1 The Strategy for Paddock Wood

*[TWBC: This representation has been put against Policies STR/CA 1 and STR/PW 1 - see Comment Numbers PSLP\_324 and PSLP\_325]*

**Question 4a**

**If 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 under Regulation 19 Phase to the TWBC “ Strategy for Capel Parish” (Policy STR/CA1) and to the inclusion of land in East Capel in “The Strategy for Paddock Wood” (Policy STR/PW1). (Tudeley and East Capel)**

*I have lived in this area for 30 years and in Capel for c28years. As a family we have explored the countryside and made great use of available footpaths and facilities.*

*When the call for development land went out from TWBC, we specifically didn't put our 7 acres up, as we felt the area wouldn't benefit from building on acres of green fields in the parish. Our land has road frontage and is neither Green Belt nor AONB status.*

*I object to the proposed plan, both where it is sited and the volume it proposes. It is based on a disproven target, developer wish-fulness, and very limited insight on the scope of impact and what would need to be funded by TWBC and residents. It brings with it a huge political risk as well as commercial risk of failure, puts vast swathes of the garden of England under yet more concrete and fails to address flooding which such a site alongside, and in, a known flood risk area will bring.*

*I would add that we in the First World decry the 3rd World for the devastation of their natural environment, their cutting down forests and their destruction of grasslands and for the climate costs these changes bring. And here we are in Tunbridge Wells, with challenging climate targets already proposing to destroy our own, much reduced already, natural environment. The TWBC plan is to decimate 100s of acres of prime and picturesque habitats to load yet more concrete and steel in its place. It is such hypocrisy.*

#### **Locations - Why Capel.**

*The Borough has nearly 50 Borough Councillors, only 1 of which lives in Capel Parish. The Borough has 18 parishes and Capel Parish (1 out of all 18) is getting 60%+ of the whole Borough's target. The imbalance is both stark and cavalier. Furthermore the plan refers to Capel as 'deprived' as if that gives the borough the right to ride roughshod across the constituents wishes.*

*And TWBC says that Southborough's air quality management problems will be alleviated by the new town at Tudeley. That is plainly nonsense. Traffic on the A26 through Southborough would more likely increase not have it reduced by Tudeley new town. And anyway it will add the AQMA issues into Tudeley.*

#### **Plan**

*Over the summer of 2019 when the plan was 1st proposed there were 3000 properties available either for sale or rent within a few miles of Paddock Wood. Existing development in the area is not finding buyers. Furthermore the ONS has advised that the targets for building are too high and based on discredited calculations and TWBC has not addressed this with Government.*

*The plan should not be taken further until Government addresses the target numbers.*

#### **Disconnected Proposals**

##### **The new town**

- 1 There is no plan to alleviate traffic problems going into Tonbridge where the road to be used is already a choke point.
- 2 There is no planned new link between the north and south Tudeley new town developments across the railway. Existing bridges and the under pass are narrow and have traffic constraints. At least 2 new bridges would be required on the planned site if the blot of development is to have any chance of being a community.
- 3 The link road to the A228 from Tudeley New Town only addresses traffic going through between Tudeley and Colts Hill. It doesn't address traffic leaking through Paddock Wood traffic up to the A21 via Matfield, nor Badsell Road traffic and Paddock wood traffic past Transfesa.
- 4 The long-standing Colts Hill Bypass in the shape now being proposed by TWBC is not long enough to address the existing issues, let alone the vastly increased volumes. Nor does it address Kent's strategic link originally seen in the 25 year old proposal (accepted by TWBC) linking Pembury to Dampiers Corner.
- 5 The new development will increase traffic along the Pembury Road into Tunbridge Wells where traffic is already at a standstill during busy periods back to the A21. There is no plan element which considers the already creaking access to Tunbridge Wells.
- 6 Consideration has not been given to Tonbridge and that side of the boroughs' boundary. Tonbridge also has traffic problems and their station is already at capacity.
- 7 This development is being seen without consideration to the planned new houses elsewhere in Kent such as in Paddock Wood, in Marden, Staplehurst, Cranbrook, Maidstone and in Tonbridge. It is foolish to consider developments as isolated projects without external factors and there is no consideration from TWBC planners of how these will interplay and impact each other. At the very least there will be a major surge in traffic, already a weak point of both TWBC today and of the submitted plans.
- 8 Pembury hospital, new just a few years ago, doesn't have planned capacity for the new household population.

The Borough planners talk about developer levies as being the answer to many problems but are known to be unreliable. As cost escalate, the levy would run short. As new things are identified, the planned budget would not cover it and local taxes would get raised or services cut.

Bus funding by Developers is promised to help manage traffic, but it is not clear how that will work and whether it will work. Nor is it clear how it is funded when development stops. And the plan appears to rely on Autonomous buses, a technology that is not yet available and for which there are many hurdles, both technical and legal. Further there is an assumption people will use buses a great deal. That is not a proven fact, in reality the age of the bus is long gone and their use is a fringe aspect whatever we might wish - The main landowner uses his car to get to TWBC, not the Bus Stop on his doorstep for example.

#### **TWBC Historic Failure to deliver**

- 1 Over 40 years ago a planned development in Paddock Wood was stopped for a while when it was found there was no sewage capacity. History repeated itself with the present Paddock Wood estates being built.
- 2 When Transfesa was developed it was on the basis that Colts Hill would be bypassed. We still wait for that, despite reclassifying a small capacity 'B' road to an 'A' road to help the process.

#### **Alternatives:**

- 1 While a green field development is attractive to developers, it isn't to the community and no use of brownfield development is in the plan. Brownfield has not been properly investigated by TWBC for delivery of any significant part of the target. And we in the Western World decry other countries who rip out indigenous woods and plains for the development of Cities, seeing a very real risk to the world's climate. And Yet TWBC are looking to foist such a concrete plateau to hundreds of acres of green fields, hedgerows and woods.
- 2 A21 built infrastructure - Available Junctions and road capacity by castle hill and its proximity to existing sewerage is an opportunity ignored by TWBC Planners

Bearing these points in mind we can have little faith in the integrity, necessity and adequacy of the proposed plan. It should be dropped and the target addressed with Government.

#### **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

# Supporting Information File Ref No: SI\_20

## Comment

Consultee	David Marriott [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	David Marriott [REDACTED]
Comment ID	PSLP_328
Response Date	21/05/21 19:29
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.10
Files	<a href="#">PSLP_328-342_image3.jpg</a> <a href="#">PSLP_328-342_image2.jpg</a> <a href="#">PSLP_328-342_image4.jpg</a> <a href="#">PSLP_328-342_image1.jpg</a>

Data inputter to enter their initials here KH

Question 1

Respondent's Name and/or Organisation Mr David Marriott

Question 3

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

Policy HA3 - Affordable Housing



#### 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

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I both live and work in Paddock Wood. I live at xxxx, Maidstone Road, Paddock Wood, TN12 , address below (*TWBC Comment - full postal address redacted*) and am a director of Core Commercial on Transfesa Road. I am currently a flood warden for the town and was a Borough Councillor for 8 years.

I am not against the principal of development it just needs to be well conceived and NOT put existing residents at serious risk.

I wish to make representations to the Local Plan, in particular object to the proposed allocations for development at Paddock Wood, north of the railway line.

I object to the proposed allocations PW1 – 2, 3, 4 and 5.

I comment as follows:

##### 1. Green belt

The majority of the proposed allocation lies within the green belt and should not be built upon. This is the CPRE green belt map (*TWBC comment - map attached as file see attachments*):

##### 2. Flooding

A large portion of the site lies within flood zones 2 and 3, especially those areas to the east of Tudeley Brook:

(*TWBC comment - map attached as file see attachments*)

You should not allocate sites for development that are at risk of flooding or that take away flood absorption thereby throwing flood water onto development elsewhere.

Tudeley brook has its banks built up with an earth bund. In the past the brook has burst its banks and floodwater has flooded the fields to the east of the brook. An earth bank is like a levee in New Orleans and with extreme weather events (or with lack of maintenance) will break.

This is a photo I took at the junction of Tudeley Brook with Eastlands Lane on 16th February 2021 in my role as flood warden. You can see that the brook is overflowing onto Eastlands Lane and that the field is “protected” by the grassy bank but only just:

*(TWBC Comment - photo attached as file see attachments)*

Whatever development is placed in these areas will take away the existing soakaway absorption feature of the fields. The vegetation and agricultural nature creates a break through the clay “plug”. If you build over this area, even with “sustainable drainage”, there will be no break through the clay. Keeping voids under houses will eventually be forgotten and clog up losing their absorption.

Oversized drains to hold excessive rainwater and allow percolation dispersal as used in the recent industrial development (PMJ to Mack) on Transfesa Road does not work. This is a photo taken of Transfesa Road by the entrance to Mack on 27th December 2020:

*(TWBC Comment - photo attached as file see attachments)*

The Turnbull field between Transfesa Road and Lucks Lane to the east of Maidstone Road is regularly inundated. Having voids under the proposed commercial buildings or parking areas is both expensive and will eventually silt up.

### **3. Affordable Housing**

There is a severe shortage of affordable housing in the area and it is well known that employers have to bus in staff from the Medway Towns or Hasting. When I was a councillor there was talk of increasing the provision of social housing from 25% to 40% and I would support this. The developers will cry into their soup pleading that such would not make any development unviable which is not correct – it just comes off the land price. It is important that developers actually build the social housing units than give money to the local authority to build elsewhere which can be frittered away.

### **4. Highways**

I am advised that there is a proposal to close the road bridge of Maidstone Road over the railway line but I could not find reference to this in your documents. I assume that this is just a stupid rumour. In case however it is being slipped in through the “small print”, I strongly object. My wife is disabled and cannot walk into town. Are you suggesting she does a 5 mile drive to travel the 0.5 mile to the town centre?

### **5. Health Centre**

The existing health centre is already over capacity and indeed even before Covid there was a 2 week wait for doctor appointments. A new health centre needs to be actually built at developers expense, opened and fully staffed before any of the proposed houses are occupied.

I hope these comments are helpful. Please confirm that these comments have been incorporated into the 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)?**

## Comment

Consultee	Mr A Batchelder [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Mr A Batchelder [REDACTED]
Comment ID	PSLP_338
Response Date	24/05/21 15:34
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	A J Batchelder
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Traffic measures	
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.**

I wish to comment on the proposals from TWBC for future traffic adjustments in Paddock Wood.

The proposal to close, to all traffic other than buses and cycles, the railway bridge in Maidstone Road, Paddock Wood seems to be short-sighted and self-defeating. Access from the town northwards to sites such as the Garden Centre and those travelling south, to Waitrose and the centre, will necessitate residents driving an additional 4 miles - either around the bypass or using Church Road and Lucks Lane. The condition of Lucks Lane for cyclists and motorists is currently dire and further traffic will cause significantly more damage. Quite apart from the use of resources to make the extended journey the additional pollution caused by traffic making the extra journey will reduce the quality of life for those living in Lucks Lane and the surrounding area and, as I commented earlier, defeat, in part, the purpose of the proposals.

Current levels of cycling and walking, other than for pleasure, are unlikely to increase as a result of the imposition of these measures. Cycles are not built for carrying significant loads and the measures would disadvantage those travelling to shop from the north of the town into the centre.

The proposed suggestions for the centre of Paddock Wood do seem to have merit and would improve the experience of visiting the town. To enjoy that experience however residents and visitors must first get to the town. The closure of the railway bridge will potentially reduce the number of visitors and damage trade.

A J Batchelder

#### 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 wish to comment on the proposals from TWBC for future traffic adjustments in Paddock Wood.

The proposal to close, to all traffic other than buses and cycles, the railway bridge in Maidstone Road, Paddock Wood seems to be short-sighted and self-defeating. Access from the town northwards to sites such as the Garden Centre and those travelling south, to Waitrose and the centre, will necessitate residents driving an additional 4 miles - either around the bypass or using Church Road and Lucks Lane. The condition of Lucks Lane for cyclists and motorists is currently dire and further traffic will cause significantly more damage. Quite apart from the use of resources to make the extended journey the additional pollution caused by traffic making the extra journey will reduce the quality of life for those living in Lucks Lane and the surrounding area and, as I commented earlier, defeat, in part, the purpose of the proposals.

Current levels of cycling and walking, other than for pleasure, are unlikely to increase as a result of the imposition of these measures. Cycles are not built for carrying significant loads and the measures would disadvantage those travelling to shop from the north of the town into the centre.

The proposed suggestions for the centre of Paddock Wood do seem to have merit and would improve the experience of visiting the town. To enjoy that experience however residents and visitors must first get to the town. The closure of the railway bridge will potentially reduce the number of visitors and damage trade.

A J Batchelder

#### **Future Notifications**

**Please let us know if 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_354
Response Date	24/05/21 14:55
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
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

**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 Ferguson [REDACTED]
Email Address	[REDACTED]
Address	- East Peckham -
Event Name	Pre-Submission Local Plan
Comment by	Michael Ferguson [REDACTED]
Comment ID	PSLP_385
Response Date	25/05/21 14:44
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Michael Ferguson
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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.**

Local Cycling and Walking Infrastructure Plan: Phase 2

I have been made aware of the above which I see is dated March 2021.

I live in East Peckham and will therefore concentrate on your proposals for Paddock Wood.

If your proposals were to come to pass, Paddock Wood would certainly become a much more pleasant place for pedestrians and cyclists, principally because you would have turned it into a ghost town with no businesses and therefore no reason to visit the benighted place. Do you really have the powers to make changes that will, pretty much, instantly put perfectly good businesses such as Barsleys and Waitrose out of business.

The only sensible way into Paddock Wood from the North is along Maidstone Road. You propose closing it at the railway bridge to people in motor cars. Are you suggesting one detours through Lucks Lane or Wagon Lane? I happen to like my wing mirrors. On the Western side one could use Whetsted and Badsell Roads. Getting through the traffic lights at the end of Badsell Road is bad enough now, never mind with an increase in the traffic using it, plus extended waiting times to allow pedestrians and cyclists to cross at the lights, plus all the cars from the new housing estate being put up there. Oh yes, and just how well is that going for the builder?

I never cease to be astonished and some of the proposals which come out of the public sector, but this is madness of the highest order. How much time and money has been wasted on this nonsense which, for the good of Paddock Wood, simply must not come to pass.

## 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	Mrs Jane EM Lamb [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Lamb Park Homes
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Lamb Park Homes (Mrs Jane EM Lamb - [REDACTED])
Comment ID	PSLP_409
Response Date	25/05/21 17:21
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
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 Jane EM Lamb, Lamb Park Homes
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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 in receipt of the email below and have read your comments to David Marriott, my neighbour. [TWBC: Mr Marriott's email referred to above contained reference to his representation number PSLP\_328]. My husband, Steve and I live close to Mr Marriott and run Lamb's Mobile Home Park – a residential caravan park for the over 50s in the corner of Maidstone Road and Transfesa Road. It has been a caravan park since the 1950s and in our ownership since 1980. I was born in PW in 1964, my mother was local school teacher and Steve and I run local businesses.

I believe the Council planners are trying to overrun the area with housing without providing local amenities (shops, schools, GPs, dentists, parking etc). It's all very well trying to pedestrianize everywhere but our tenants are not all mobile, cannot walk the 900 m in to Paddock Wood and are not strong enough to carry their shopping home should a bus service not match their travel requirements, let alone try to balance a week's worth of shopping on a bike. The stupid idea about the railway bridge is beyond belief. How are those of us north of the railway meant to get into Paddock Wood? Add to that the plan last year to close Commercial Road to through traffic near the war memorial, meant that a trip to the bank, or Waitrose in Paddock Wood would result in me driving down Lucks Lane/Wagon Lane or down the A228 and along Badsell Road using Warrington Road or Church Road to get access, all options adding MILES to my journey. So much for cutting down car usage! In addition, we are land owners at Old Hay, access for which will be difficult with these proposals. I also own horses kept near Mascalls School. Again getting there would be disrupted were the bridge to be closed. I have to exercise my driving horses on the road and am often seen driving them around Paddock Wood. Closure to thru traffic in Commercial Road would limit some of my circular routes and detract from my enjoyment of my sport/hobby. It is not as though carriage driving rates highly in the local plans to get horses off the highway!

Finally, do any of the people making decisions about Paddock Wood, Capel or Tudeley actually live in the area? I suspect not. I am not a NIMBY (Not in my back yard) and accept the need for more housing, but surely filling Commercial Road with more retirement flats and a funeral directors is not reviving the local high street! Maybe the rationale, was for a one stop shop: old people in local flats are easily moved into the funeral director's when they die! Is the cemetery on the current outskirts of Paddock Wood going to be able to cope with the huge influx of people already expected, let alone when you build houses across the gap between Tonbridge and Paddock Wood? Locals, want good shops, not necessarily big named chain stores, adequate parking, not outsiders telling us how to exist in Paddock Wood and ignoring brown field sites or having to lose our countryside to provide houses for non-locals.

In the bigger picture with the proposal to merge Paddock Wood, Capel/Five Oak Green/Tudeley with Tonbridge for some garden city development, where are all the cars going to fit? The station car parks at both Paddock Wood and Tonbridge would not cope with possibly 4000 more cars and commuters and certainly the local road network and bus services cannot service these people either. My existing GP at Woodlands Health Centre, ignoring current COVID issues is so full, I have to book FOUR WEEKS in advance to see my GP. Add more housing and ..... plus if the railway bridge is closed to cars, I will have to do 4 miles to get there! (I have had both knees replaced and am still recuperating so cannot walk/stand for great lengths of time yet).

In summary I do not think TWBC planner are representing me or the residents 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)?**

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	Lesley Wakeling [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Lesley Wakeling [REDACTED]
Comment ID	PSLP_410
Response Date	26/05/21 09:20
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	Lesley Wakeling
Question 2	
Agent's Name and Organisation (if applicable)	Lesley Wakeling
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Paragraph 1,2,3 - with reference mainly to these points as they form the basis of the plan.	
Question 4	
<b>Do you consider that the Local Plan:</b>	
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 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.**

I object to the plan of building so many houses in green belt area. I also object that the infrastructure is not being put in place prior to the consideration of starting building works. The impact on the current residents is terrible and frankly scary. I am aware that consideration is being made to close the railway bridge on Maidstone Road to through traffic which cuts the town in 2. You have defined that most people live in the south of the town and there is a massive employment opportunity in the North, yet the bridge is the link to the 2. The intended traffic flow to enter PW from the North would cause massive congestion at Badsell Road, Mascalls junction and into the town. This would in turn cause shoppers to not come to PW and the shops would close. Look at Tonbridge High Street. People do not walk or cycle as they have lives where the car is integral to work/childcare/schools etc. Please reconsider this crazy decision and stop trying to turn what was a country town, the place I chose to live into a concrete maze where I do not wish to remain. Please consider the current residents and not the future ones who may or may not work locally/commute to London due to the change in working trend. These plans were drawn up prior to Covid 19 and should be reviewed.

#### 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 would ask that you consider the programme for any work and put infrastructure in place first, then build accordingly with consideration for current residents and their current needs. To make alterations just to tick 'Green Policies' is wrong. Yes we consider the future but how can having to drive twice as far to get to and from work because of a major detour with the railway bridge closed be an effective benefit to the environment. All the traffic sitting in a queue with engines running.

#### 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 do not support the long term plan for Paddock Wood. It is harmful to the environment and to my mind the infrastructure of the area is not being given priority. I think the plan needs a review following the change in lifestyles and work patterns due to Covid 19. Will people travel to London. Will people work locally, meaning 10-15 mile radius, therefore needing easy access to the full circumference of PW. If the retail area is to be encouraged then it needs to invite easy access for outsiders or it will close and die.

People rely on cars for their busy lives. Walking and cycling is a thing of the past for day to day living. Mum doesnt have time to walk the children to school, go home, get the car, go to work, drive home, walk to school etc and likewise with the shopping.

The railway bridge closure idea is mad and not a step forward at all.

I think TWBC is jut out to wreck Paddock Wood.

#### Future Notifications

**Please let us know if 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	Darren White [REDACTED]
Email Address	[REDACTED]
Address	
Consultee	Darren White [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Darren White [REDACTED]
Comment ID	PSLP_411
Response Date	26/05/21 08:58
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Darren White
Question 3	
To which part of the Local Plan does this representation relate?	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 4a

If 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 proposed number for Paddock Wood and Capel is totally unrealistic, during normal conditions the station and trains are full from Paddock Wood, so how are all these people going to get to London etc for work as there isnt sufficient employment in the area to support 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)?**

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:**

The proposed number for Paddock Wood and Capel is totally unrealistic, during normal conditions the station and trains are full from Paddock Wood, so how are all these people going to get to London etc for work as there isnt sufficient employment in the area to support them

**Future Notifications**

**Please let us know if 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	Alasdair Robertson [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Alasdair Robertson [REDACTED]
Comment ID	PSLP_441
Response Date	26/05/21 13:20
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Alasdair 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/PW 1 The Strategy for Paddock Wood

**Question 4a**

**If 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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Closure of Paddock Wood railway bridge

I understand there is a proposal re the above.

I would like to point out that this is an absurd and counter productive measure. Not only would this kill the commercial viability of the town it would also mean very lengthy alternative routes and subsequent co2 emissions. Furthermore it would prevent access to the station and make train travel impossible!

Please do not make this option a reality!

There are similar concerns with limiting car access on Commercial Road which would again prohibit access to the 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)?**

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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	Wendy Roberts [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] - -
Event Name	Pre-Submission Local Plan
Comment by	Wendy Roberts [REDACTED]
Comment ID	PSLP_459
Response Date	27/05/21 08:29
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Wendy 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/PW 1 The Strategy for Paddock Wood

**Question 4a**

**If 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 Wendy Roberts and I live on Maidstone Road in Paddock Wood. I live the Hop Farm side of the railway bridge and I am shocked to discover that Tunbridge Wells Borough Council are considering cutting off my side of Paddock Wood.

The idea of walking and cycling is all well and good but there are a lot of elderly and disabled people living on Maidstone Road and the roads off of it and you are essentially cutting them off from their town and medical centre. As a disabled person who cannot walk very far, I would have to drive out of Paddock Wood, drive onto the A228, left into Badsell Road and left again into Maidstone Road to get to Medical Centre or town centre. How is that good for the environment?

I want to object in the strongest terms to this disgusting discrimination of hundreds of Paddock Wood 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)?**

## Comment

Consultee	Val Severn [REDACTED]
Email Address	[REDACTED]
Company / Organisation	East Malling & Larkfield Parish Council
Address	[REDACTED] [REDACTED] Larkfield [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	East Malling & Larkfield Parish Council [REDACTED] [REDACTED]
Comment ID	PSLP_485
Response Date	26/05/21 20:04
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	East Malling & Larkfield 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/PW 1 The Strategy for Paddock Wood

Question 4a

If 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 been asked to respond to the above draft Plan.

It is noted the Plan seeks to meet the assessed housing needs of your Borough within its own boundaries and this is welcomed given the existing system.

However, the Parish Council appreciates the housing figures imposed, in effect, by Central Government have the regrettable consequence of requiring a level of development that ignores much of your Borough is in the Green Belt or Area of Outstanding Natural Beauty.

It would urge your Council, like we have our own Borough to question Central Government policies in this respect including the changes signalled in the Queens Speech which look likely to increase the pressure for more development in the South East and erode still further local peoples' ability to influence local planning.

However, the purpose of this letter is to express our concern about the effect of the housing proposals on this Parish in terms of traffic impact especially from Paddock Wood.

We realise our Borough is especially concerned about traffic impact on Tonbridge Town but we wish to press the case for a proper assessment on the impact on East Malling.

The route through East Malling with its narrow High Street and Chapel Street; low level railway bridge; Width Restriction Order and Conservation Area status with many listed buildings is unsuitable to take more traffic. It would be detrimental to the quality of life of local residents and the Conservation area.

It is also relevant that outside our Parish the crossroads at Watlingbury are an Air Quality Management area and little can be done there to ease the peak time traffic congestion which occurs.

We fear traffic flows from Paddock Wood will increase the numbers using the north-south route from East Peckham via Watlingbury crossroads through East Malling to the A20 and nearby junction 4 of the M20 at Leybourne.

It is considered everything possible should be done to direct such traffic to the A228 which was some years ago re-classified as the north-south route with the dualling of the West Malling By-Pass and down to Junction 4 by a Leybourne By-Pass.

We would also urge improvements, long promised, take place at Colts Hill and we note there is a reference to a by-pass of Golden Green linking to the A228.

In conclusion, we would ask that with KCC who we realise advise your Council on highway issues the effect on East Malling is properly 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)?**

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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	Gavin Joyce [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Yalding [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Gavin Joyce [REDACTED]
Comment ID	PSLP_491
Response Date	26/05/21 17:47
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Gavin Joyce
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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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Would you please note my comments regarding the above proposal.

I am against closing the railway bridge as I use Paddock Wood for both the railway station and shopping and live in Yalding to the north.

The alternative route is via the hop farm, to Five Oak Green then Paddock Wood. An additional 3 or 4 miles, increasing traffic on that route and adding pollution.

The station car park has more capacity on the southern side and the northern side is often full earlier. This will necessitate a 4 mile round trip for a commuter to park their car after arriving at the station.

This will impact businesses based in Paddock Wood as shoppers will 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	Simon Faiers [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Simon Faiers [REDACTED]
Comment ID	PSLP_492
Response Date	27/05/21 00:00
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Simon Faiers
Question 3	
To which part of the Local Plan does this representation relate?	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 4a

If 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 just watched the video about how to comment on the local plan. Is this the means by which ordinary people are supposed to make comments on the decisions being taken about the places they live by people who, mostly, live elsewhere? It's complex, onerous, full of legalese, bureaucratic and off-putting, which is quite possibly the intention. All I wanted to do was comment on the proposed closure of Paddock Wood railway bridge to all traffic but buses and, presumably, the ambulances coming out of Eldon Way.

Currently cars travelling between Paddock Wood and Maidstone travel over that bridge. Traffic travelling between Paddock Wood and Tonbridge or Tunbridge Wells goes the other way, either up Badsell Road towards Five Oak Green or through Matfield to Kippings Cross and the A21.

If the bridge was to be closed then the majority of that Paddock Wood / Maidstone traffic would have to come down Badsell Road. Anyone who lives in Paddock Wood can well understand the consequences of that. At rush hour, in particular, the tailbacks at the Colts Hill/Badsell Road roundabout will be worse. Traffic will also tail back from the junction of Maidstone Road and Badsell Road in Paddock Wood. I see it every day as it is now. I can only imagine how much worse it will become if the bridge is closed.

Some traffic will probably also divert to using lanes like Lucks Lane and Queen Street.

I cannot imagine what the perceived problem might be that this proposal is intended to address. Whatever it might be, closing that bridge will end up causing even bigger problems in Paddock Wood.

TWBC should stop tinkering with our Town.

## 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	Michael & Brenda Stewart [REDACTED]
Email Address	[REDACTED]
Address	- - - -
Event Name	Pre-Submission Local Plan
Comment by	Michael & Brenda Stewart [REDACTED]
Comment ID	PSLP_493
Response Date	27/05/21 11:10
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Michael & Brenda Stewart
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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.**

We cannot believe that the proposal to restrict travel over this bridge to buses and emergency vehicles has been made with any serious thought for the impact this would have on the communities to the south of Paddock Wood. A great many people from Yalding and surrounding villages regularly travel to the town for shopping and for essential access to the railway station. Alternative routes to the town would either be significantly longer or via narrow country lanes, or both. It would therefore be environmentally harmful and unquestionably damaging to the commercial viability of many retail outlets in the town.

It is impossible to discern any sense or purpose in such a proposal and we wish to record our strongest objections to 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	Chloe Hunn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Chloe Hunn [REDACTED]
Comment ID	PSLP_497
Response Date	27/05/21 09:29
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Chloe Hunn
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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 new resident of Paddock Wood, I live in Maidstone Road and have been here for four months. I disagree with the plan to remove vehicle access over Paddock Wood railway bridge, as this will effectively cut the town into two parts and reduce ease of access for residents and visitors, and cause a lot of chaos on nearby 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)?**

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 Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_525
Response Date	28/05/21 08:22
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
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/CA1	
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 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.**

CPRE Kent objects to this policy. It includes some policy provisions which relate to the strategic sites in addition to those specific to Capel Parish.

Our responses to this policy should be read in conjunction with our responses to the strategic policies (STR 1 – STR 10) and the strategic site policies (STR/SS1 and STR/SS2).

We suggest that the initial two paragraphs of the policy are retained, with the remainder of the development strategy for Capel “excluding land which forms part of the Strategic Growth sites at Tudeley Village and Land east of Capel and Paddock Wood”, as suggested by those paragraphs.

The Tudeley Village development (policy point 2), the Capel element of the Paddock Wood extension (policy point 3), compensatory improvements to the Green Belt within Capel (policy point 4), transport improvements (policy point 5) and use of developer contributions towards the expansion of Capel Primary School at Five Oak Green (policy point 6a) should be referenced in the preamble as being provided by the Strategic Sites (STR/SS1 and STR/SS3) but should not form part of the policy.

The items to remain within the policy are:

- . Set Limits to Built Development for Five Oak Green (policy point 1).
- . Seek developer contributions from residential schemes for open space, sport and recreation facilities, including improvements to the football pitches at Five Oak Green (policy point 6b).

Query whether this policy also include the standard policy provision for windfall developments, and the retention of employment space (at Brook Farm).

We note that the northern part of the site at AL/RTW17 falls within Capel parish. The preamble to that policy indicates that the area within Capel is to be retained as open space/landscape buffer to the built development and is not included in the proposed green belt release for the site and we suggest that this wording is repeated in the preamble to this policy.

Due to the distribution of development across the parish and within the parished and unparished areas that border it, we consider that a parish-wide Inset Map is required. This would provide the context for the policy, clarify the relationships in terms of scale and connectivity between Five Oak Green, Brook Farm and the proposed strategic sites while additionally improving visibility of the heritage assets and designated ecological and wildlife sites within the parish.

We support the Council's decision not to allocate the Castle Hill Garden Settlement Option (primarily within Capel Parish) that was submitted as an alternative to the Tudeley garden settlement allocation. CPRE Kent is opposed to building in the AONB or the green belt unless exceptional circumstances have been made out, which we do not believe would be the case here.

#### 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.**

Amend policy as suggested above – to ensure policy provisions for the strategic sites are not duplicated.

Provide an Inset Map for the whole of the parish – to provide the context for this 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 further discuss the points raised 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	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_595
Response Date	28/05/21 14:00
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
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/PW1	
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.**

Please see comments submitted under STR/SS1 (replicated below).

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.

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

#### 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**

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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

# 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_625
Response Date	28/05/21 13:11
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PSLP_616, 622-625_GSP for Yalding Parish Council_SI-2_Representation.pdf</a> <a href="#">PSLP_616, 622-625_GSP for Yalding Parish Council_SI-1_Covering Letter_Redacted.pdf</a>
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/PW 1 The Strategy for Paddock Wood

*[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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*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 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	Mark Andrew [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Mark Andrew [REDACTED]
Comment ID	PSLP_991
Response Date	02/06/21 21:07
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Mark Andrew
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 (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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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 for over 11 years. I do not believe the local plan is sound due to the following reasons.

It is clear that since the new development has started the traffic on Queen Street and around Paddock Wood has increased considerably. Large truck using the narrow roads and the increase in general traffic is making the road system in Paddock Wood dangerous, and with the limited bridge size on Queen Street and the refusal of the rail company to improve the bridges, adding the large number of properties to Paddock Wood is an unsustainable plan, with little or no real programme to deal with the increased population.

Paddock Wood is currently being allocated approximately 4000 new homes, 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. A more equitable spread throughout the borough, and reduction of the number of dwellings in Paddock Wood would improve the disastrous threat to the environment and damage to the community the local plan now poses.

The local railroad station in non-covid times has a full car park by 7:30 in the morning and standing room only on the trains. The train company have already stated they will not be increasing the number or size of trains passing through Paddock Wood. Much in the local plan for Paddock Wood is made of the public transport via train, however this is already an overcrowded and over committed facility with no plan for improvement or growth, the council are clearly aware of this, but seem to ignore this very real issue as it does not fit into their planning. However, this is already a problem and will increase in the future if the number of houses proposed goes ahead.

In addition, there is little community facilities with one very run-down gym, and little or nothing for the younger generation to do. The high street is being decimated with shops being turned into old people's homes. Already harming the community of Paddock Wood.

The doctor's facilities are already overcrowded, making it difficult to gain appointments within a reasonable time frame and nothing in the local plan addresses this. The same issue applies for school nursery's etc.

#### PROPOSED LAND

The local plan intends buildings to be located on high quality farmland in direct contravention of the government's policy to build on brown belt, or low-grade farmland, and avoid developing on high grade farmland. Local survey shows the land the plan intends to use is probable some of the best farmland in the UK for crop growth. Once built it is gone forever taking a very valuable and rare commodity from the country, decent planning should allow less building in a single place a better spread of building areas and avoid the destruction of high-quality farmland. This added to the destruction of so many trees, is another sign of a poorly thought-out programme.

One of the key objectives of the governments Sustainable Farming Policy is to:

Introducing the Environmental Land Management scheme to incentivise sustainable farming practices, create habitats for nature recovery and establish new woodland to help tackle climate change

A local plan which removes hundreds of trees, builds on high quality farmland and destroys wildlife habitat is clearly contra to this. A more reasonable housing number in Paddock wood could be undertaken without this wholesale destruction of farmland and orchards.

The governments Woodland Carbon Guarantee Scheme stated

Woodland Carbon Guarantee scheme will encourage farmers and landowners to plant more trees and help to tackle climate change

-

Yet the local plan for Paddock Wood includes the removal of hundreds of fruit trees which currently offer carbon enhancement and a valuable food source to the country. A more considered approach could reduce the loss of these assets considerable.

The local plan for Paddock Wood works against Government Environmental Policy's and should be reviewed with these in mind.

The removal of this number of trees will also have a negative effect on the flooding issues in Paddock Wood and the surrounding area. And although the local plan claims to address this it seems this is in words only as no workable flood reduction programme is covered in the details of the local plan and it is clear that new developments are having the ground built up to ensure water runoff. Clearly far from improving the flood issues in PW this will exasperate the issue. I note no guarantee from Tunbridge Wells local council as to the improvement in this situation is included in the documentation. At a minimum TWC should be pledging a guarantee, which should not be an issue if they believe their own words.

In addition, the council are allowing construction to be carried out by building companies who do not hold the basic standards such as considerate construction scheme membership. Paddock Wood is a community every road closure, late night working, mud on the roads and dust in the air effects people's lives, yet little or no consideration has been given to the quality of companies allowed to carry out work. I refer you to the current construction in Paddock Wood where protected trees where apparently accidentally removed, the same company had staff working on site late into the evening and have closed a major road into Paddock Wood without prior notification. At a minimum the council duty of care should ensure only high quality building firms with good reputations for considerate construction and good communication with local community's are used.

## 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 destruction/ removal of high-quality farmland, with only brown belt or poor-quality farmland being built over. This would bring the plan into alliance with the national guidance.



No removal of large orchards and the destruction of trees and wild habitat on a large scale as the plan for paddock wood currently does.

An environmentally plan with consideration for local and national environmental policy's

Use of only building companies who have a commitment to the environment and local community, such as companies with considerate construction membership, not any company regardless of their lack of credentials.

Reduction of housing in and around Paddock Wood and a more equitable allocation throughout the borough.

Guarantee from Tunbridge Wells local council as to the improvement of the flood situation.

#### 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:**

Local voice has been largely ignored throughout the processes. The council have simply overruled Paddock Wood town council and local action groups have not had a large voice in the process. The process should include clear communication with the local community and consideration of the local community voice. I would like to have a voice.

#### Question 8

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

The Paddock Wood sustainability section states:

"Because the inclusion of a new garden settlement and large urban expansion were found to be fundamental to the preferred strategy, the SA also considered alternative locations and scales to these aspects of the final growth strategy. The findings of this process were that, for the urban extension, although multiple settlements were considered, Paddock Wood was the only reasonable location for an extension and that a scale that maximises benefits for the housing objective whilst being set away from the constraints in the south (ancient woodland and AONB), but with land-take in the Green Belt to the west of Paddock Wood, in Capel Parish, to help address existing flooding issues, would provide a suitable and achievable, scale of extension. This option was found to have benefits for the economic, environmental and social elements of sustainability, albeit with most benefits being social and economic, rather than environmental."

With the high street being mostly destroyed, no major industry requiring growth through increased workforce and no real road infrastructure or scalable rail infrastructure how can this have a positive economical and social aspect. This is clearly just a statement with no real truth behind the words. Many of the houses are already being advertised to investors in China "a tube video of this can be found" and pricing of houses currently being built being high, how does this improve either social or economic prospects for the area.

## Future Notifications

**Please let us know if 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_1261
Response Date	04/06/21 14:00
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
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.	
STR/PW1 AL/PW1 and STR/CA1 Also ALL.	
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 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.**

Much of the development is proposed on green belt land and green belt protection was set up to prevent this type of development. If this goes ahead then there is no purpose of green belt protection status. The west of the borough is highly densely populated with major towns of Tonbridge, Tunbridge Wells, Paddock Wood also the close proximity of Sevenoaks and Maidstone which is already causing congestion and strain on roads and public transport as well as shops and services such as schools, hospitals and leisure facilities. The east of the borough is very lightly populated so would benefit with more housing to spread the load. Flooding is also a major factor and I would be concerned that while Tudeley might not flood at present the fields currently hold much water which prevents the water running off to the Medway too quickly. If built on then the surface run off would be much quicker and places down river such as East Peckham, Yalding and Maidstone are likely to flood to a worse degree and quicker than at present. Many sites at Paddock Wood where development is proposed are very low lying and are often flooded in the winter months. With these areas built on I do not believe that any flood prevention can prevent the areas being under water in times of heavy rainfall due to the streams and ditches being at almost ground level and if the ground did drain quicker then places down river on the Medway are likely to suffer more extreme flooding.

#### 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 my spreading the housing allocation to the eastern part of the borough would ease the congestion that is already occurring in the west of the borough and it would also not interfere with the green belt. This would also help to keep the flooding of areas along the river Medway to a minimum.

#### 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	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_1265
Response Date	04/06/21 13:00
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
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.	
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.**

I have already explained my association since 1989 with Paddock Wood in my comment on STR/SS1.

As in the previous comment, there are too many homes added here.

Paddock Wood does not have the capacity to absorb the size of the suggested development, and have any sense of community. The proposed new hall on the Memorial Field, which was needed **before** the new houses were/are built, will not be sufficient for the people coming with the vast number of new homes. The road system is not suited to take the number of new journeys - the environment will suffer from more air pollution, more noise, congestion, carbon used up waiting in traffic queues.

The policy suggests two more forms added to Mascalls School. I live in Siskin Gardens, and getting out onto Mascalls Court Road at school end times is a disaster. The parked cars cause obstruction, as do the children crossing Mascalls Court Road without pause or supervision, so no traffic can flow in either direction. An extra two forms will hugely increase this parking nuisance - where do you envisage the parents parking? They already use Linnet Avenues, Mascalls Court Road, Putlands Sports Centre, and there is no more space. It is no good saying they shouldn't do it - they do, because there is no alternative under the expensive and discriminatory school bus policies and the lack of safe cycle routes. No one can expect a child to walk 3 miles along a main road with no pavement, yet this is what the school bus policy expects. Parents will use their cars - so you need to change the bus policy and provide proper school buses to where people live. We need safe, dedicated cycle routes, separate from all other traffic. We need a proper joined-up transport policy.

I do not think it is sufficient merely to 'seek' developer contributions to infrastructure. This should be mandatory. Without the necessary infrastructure the town is unviable. Residents, old and new, should not suffer while developers make unseemly profits out of degrading the environment for the people, who seem to have so little say in any of this.

The cycle routes proposed do not seem helpful at all, nor do they seem to be dedicated. If I want to cycle to Tonbridge, I need to cycle along the B2017. I need a dedicated cycle route all the way from my home to Tonbridge, along the most direct route. We need sustainable active transport, not a half-hearted attempt that will not make it possible for even those keen to try. It is the hesitant and cautious who you need to get out of their cars - not those who are already cycling enthusiasts in their lycra who can cope with lorries passing within a whisker of their vulnerable bodies. You need to enable people who are visiting their friends in Tonbridge for a cup of tea, or popping to the shops or the doctors, wearing normal clothes, to feel able to cycle.

The number of new homes will surely require a new primary school. That is not mentioned.

#### 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\_72

### Comment

Consultee	Emma Heather ( )
Email Address	
Address	
Event Name	Pre-Submission Local Plan
Comment by	Emma Heather ( )
Comment ID	PSLP_1333
Response Date	04/06/21 16:07
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Files	<a href="#">flood.jpg</a>
Question 1	

Respondent's Name and/or Organisation	Emma Heather
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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.

The Strategy for Paddock Wood paras 5.230 - 5.245Policy STR/PW 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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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.**

##### Infrastructure

The current plan for building in Paddock Wood is in excess of the scale that the town can cope with. The current building works that have planning permission and are ongoing are just the tip of the iceberg when considering the entirety of the planned building TWBC has in store for Paddock Wood. However there has been little by way of changes to the current infrastructure to enable the town to cope with the current crop. The junction of Badsell road with the A228 and with Maidstone Road is already difficult during rush hour. The Colts Hill roundabout does not cope well with traffic leaving Paddock Wood in the morning rush hour. The additional traffic here from the new developments will exacerbate this issue. The junction at Maidstone Road and Badsell Road (I live on the corner here) is always busy. The morning rush including travel to Mascalls school makes it almost impossible for me to leave my driveway in the morning. The added traffic will only make this worse. In addition the proposed closure of the railway bridge to all but buses will put a heavier burden onto this junction as more people try to leave Paddock Wood via this route. This has not been properly considered by TWBC.

##### Services

There are limited services within Paddock Wood. The Dentist and woodlands Health Centre are oversubscribed already so the additional houses and occupants will make this worse. There appears to be no plan to improve the town centre for commercial premises; recent additions have been the approval of a nursing home with the removal of some commercial premises, the loss of a food outlet to be replaced by residential block and also a second funeral parlour. This does not equate to making the town centre a place for residents shopping requirements.

Whilst there is mention of the proposed community centre on the memorial field and additional amenities there is no real indication of how these will be implemented and if they will meet with the approval of the local residents.

##### Flooding

There is a well known ground water flooding issue in Paddock Wood in addition to Tudley Brook bursting its banks. My garden floods whenever there is heavy rain. My property is not in a recognised flood plain and as such it is my view that the building of properties throughout Paddock Wood will cause additional pressure on the current residents as well as those in the new builds without significant flood prevention planning that I do not believe has been carried out.

#### 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.**

#### **Infrastructure**

It is my belief that the junctions on Badsell Road would not be able to cope with the proposed additional housing and the concomitant increase in traffic no matter what the modifications are. I believe that in order to cope with the current developments the junction at Badsell and Maidstone Road must be modified into a more free flowing junction to prevent congestion build up. I understand that this was part of the proposal for the site opposite however there appears to be no sign of this progressing or that it is a requirement in the local plan.

The railway bridge should not be closed to through traffic, this will prevent the additional pressure on the Badsell Road junction.

#### **Services**

I am unsure where the location of these are intended to be. There is no clear requirement or incentive for the developers to allow space for this and the town centre is apparently being filled with residential properties or unnecessary commercial ventures. Without the guarantee that these services can and will be supplied the local plan cannot work and is unsound.

#### **Flooding**

I cannot see a way to prevent flooding on a known flood plain in an area where there is a ground water problem. I understand that Southern/South East Water have failed to put the foul water system in place as they had planned. The building work to the South of Paddock Wood has already caused an increase in the flooding to my property and the water is significantly silted. I cannot see a way that the plan can be made sound regarding 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)?** . 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.** [flood.jpg](#)

#### **Future Notifications**

**Please let us know if 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	Jo Edwards ( [REDACTED] )
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Jo Edwards ( [REDACTED] )
Comment ID	PSLP_1334
Response Date	04/06/21 15:48
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Jo Edwards, Sport 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.

STR/PW 1 (6)

### 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 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 the Council's Reg 18 draft Local Plan policy AL/PW 4 the site was proposed to be allocated for the provision of a community hub subject to requirements including.

- 1 An assessment has been undertaken which has clearly shown the area of playing field which would be lost as a result of the development is surplus to requirements; or the loss of playing fields resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;

In the current draft policy this requirement has been removed, as have two other requirements for the site's development.

The submission draft policy is not now compliant with paragraphs 96 or 97 of the NPPF or Sport England's Playing Field 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.

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 policy should be amended to include the requirement for any development on this site to demonstrate that, an assessment has been undertaken which has clearly shown the area of playing field which would be lost as a result of the development is surplus to requirements; or the loss of playing fields resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;

#### 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 policy as drafted is clearly contrary to the Council's evidence base for playing pitches provided by its Playing Pitch Strategy 2018 in which it is stated in several sections that the site should be protected unless its loss is justified or mitigated in accordance with Sport England's policy.

The omission of this requirement now has not been justified. The current planning application relating to this development does not comply with Sport England's policy and the Local Plan policy appears to have been redrafted to enable its requirement and that of paragraphs 96 and 97 of the NPPF to be overlooked.

### Future Notifications

**Please let us know if 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	Julian Wilson ( [REDACTED] )
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Julian Wilson ( [REDACTED] )
Comment ID	PSLP_1353
Response Date	04/06/21 16:03
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
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	

**If 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.**

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	Monique ten Grotenhuis ( [REDACTED] )
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Monique ten Grotenhuis ( [REDACTED] )
Comment ID	PSLP_1363
Response Date	04/06/21 16:44
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Monique ten Grotenhuis
Question 3	
To which part of the Local Plan does this representation relate?	Policy
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 - PADDOCK WOOD PAGES 138 TO 172.	
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 ☐ . ☐ 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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I have yet to see anything in the plans that can adequately deal with the strain on the infrastructure of Paddock Wood, whether this is traffic, parking, transport links, or flooding & drainage. Nothing in this takes into account that large scale overdevelopment of any one area will do nothing but blight the area & take away from it any individuality. The lush farmland of orchards & crops will be lost forever and the affects on our environment will have nothing but a detrimental 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)

#### Future Notifications

Please let us know if 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_1471
Response Date	04/06/21 16:11
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-1 Cover Letter Redacted.pdf</a> <a href="#">PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-2 Representation.pdf</a> <a href="#">PSLP_1448-1479(not inclusive)_Troy Planning for PWTC SI-3 PW TC Response to Reg. 18.pdf</a>
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/PW 1 The Strategy for Paddock Wood

[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.

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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 – 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 different 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 I 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	Bjorn Simpole [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Tunbridge Wells Constituency Labour Party
Address	[REDACTED] [REDACTED] Tunbridge Wells [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Tunbridge Wells Constituency Labour Party [REDACTED] [REDACTED]
Comment ID	PSLP_1529
Response Date	04/06/21 15:52
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	TW Labour Party
Question 3	
To which part of the Local Plan does this representation relate?	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	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.

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 Labour Party believes that the proposed allocations for Paddock Wood are excessive and not justified.

#### 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	Claire Derbyshire [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Tudeley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Claire Derbyshire [REDACTED]
Comment ID	PSLP_1720
Response Date	04/06/21 16:56
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Claire Derbyshire
Question 3	
To which part of the Local Plan does this representation relate?	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

*[TWBC: this representation forms part of Comment Number PSLP\_1718 against Policy STR/CA 1]*

**Question 4a**

**If 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 object to the inclusion of land in East Capel in "The Strategy for Paddock Wood" (Policy STR/PW1).

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.

**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
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## 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_1760
Response Date	04/06/21 16:27
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
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\_1759 and PSLP\_1760]

**Question 4a**

**If 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 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**

**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

# 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_1888
Response Date	04/06/21 11:43
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">C Richards - Appendix D Climate Change Flood Zone 3a map.JPG</a>
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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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.**

5.153 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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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 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

**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

## Comment

Consultee	Susan Lovell [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Paddock Wood [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Susan Lovell [REDACTED]
Comment ID	PSLP_1901
Response Date	04/06/21 16:43
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.9
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mrs Sue 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/PW 1 The Strategy for Paddock Wood	
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.**

##### Policy STR/PW1

##### Number of Houses

TWBC's numbers were calculated on old figures and there is already evidence that the housing numbers are hugely inaccurate. TWBC has the right to challenge the government on the number of houses - and it should do so!

I am unhappy that Paddock Wood and Capel are jointly getting the lion's share of the housing - a figure of 68% has been mooted, or 33% for Paddock Wood alone! There should be a fair spread across the borough. The noise and air pollution of 250 houses built in Paddock Wood every year will make living and working in the town a living hell.

I am not happy that numbers of houses on each potential development site have been estimated. This has made it almost impossible to make any reasoned judgements on the matter.

**Housing need and type** - the latest calculations show that much less housing is actually needed (some sources have said it's almost half!) 'Affordable' housing is rated at 80% of market value - how many local people will actually be able to afford these homes? The garden village principles state that there should be housing types that are genuinely affordable.

There are people in Paddock Wood who dream of owning their own home but there is no way that they will be able to afford an average £378,000 family house in the borough, let alone in their own town. Residents should be encouraged to live within a close proximity to their family.

I believe the homes that are currently in development are being marketed to those in Greater London.

**Paddock Wood should remain of a largely Rural nature** - This statement is part of PWTC's draft neighbourhood plan. Effectively doubling the size of Paddock Wood does not match this statement in any way. Development proposals should not have an adverse impact on the landscape setting of Paddock Wood and should maintain the distinctive views of the surrounding countryside from public vantage points within and adjacent to the built-up area.

From Castle Hill view point in Brenchley the views will be irrevocably changed.

TWBC should be seeking and reassessing out other sites such as the A21 corridor (the Castle Hill proposal) and Blantyre House.

**Flooding** - TWBC want to build on category 2 and 3a flood risk areas. This hugely contradicts the NPPF Climate change flood risk assessment. Huge amounts of developers' money will inevitably be spent on flood mitigation, diverting funds from other essential infrastructure.

Southern Water employees have also told me that as soon as it rains the storm tanks are full, so there will have to be other valid sites for more of these tanks. The infrastructure needs to be put in place before the houses and roads are built.

**Biodiversity** - wildlife and plants. Countless creatures will lose their habitat. I have major concerns over the habitat of tawny owls, kestrels, sparrowhawks, buzzards and other wildlife (Including their prey) if PW1\_7 and other large areas of agricultural land are heavily built upon. Families of these creatures are a common sight/sound over that area. If you remove or alter the habitats of the local wildlife The proximity of more people and their pets to historically natural areas will invariably be detrimental.

The draft local plan states that there will be a 'net gain' i.e. more trees will be planted than lost. However, these will be saplings. A mature tree will take up between 50 and 100 gallons of water per day. The removal of mature trees and hedgerows will decimate the habitat of thousands of animals and birds in Tunbridge Wells Borough Council's draft local plan. Planting additional trees and hedgerows will not adequately help these creatures, as they will not be able to make their homes in young trees. We need to ensure that developers calculate the impact of any developments using the government's agreed biodiversity impact accounting metric.

(Gov.uk/government/news/spring-statement-2019-what-you-need-to-know/)

Biodiversity net gain is of course a government requirement.

Church Road's important hedgerows are well over 30 years old, as defined by the Hedgerows Regulations 1997 and there are laws against these being destroyed.

**Roads** - There will inevitably be a new road built East of Paddock Wood, possibly within PW1\_7. This will cause more light and noise pollution. I hope that Church Road will get the footpath it so desperately needs as soon as possible. The infrastructure will need to be present before the developments. Current residents cannot continue to risk their lives while walking to the town centre or station. Church Road needs improving in that cars, travelling in both directions, pass our row of houses over the white line in the road. There needs to be more done for traffic calming than the extension to the 30mph limit, which nobody seems to take notice of anyway.

The country lanes within our area will not withstand the increased traffic, including the industrial traffic such as Scrapco and Osmonds at Old Hay.

**Green Belt land** - policies AL/PW1 & AL/CA3 - an exceptional reason is needed to build upon green belt land. Sevenoaks has already had its local plan rejected by the government due to this.

**Green Spaces** - I am concerned about the green space/rest area behind the Wesley Centre as it has been labelled as a potential development area and giving us a local green status may frustrate the potential. This should be labelled as a local green space and kept that way.

Otherwise, there is potential for building on that site which is not what local residents want.

I am concerned about the Mascalls school playing field being given as insufficiently evident as a local green space. I would hope that this would not be built upon.

I'm also concerned about the natural woodland behind Warrington Road/Heather Bank 1.27 ha of natural woodland - this is important wildlife habitat and should be protected.

There is ancient woodland, ponds, and meadows to the south-east of Mascalls school, bounded by Mascalls Court road and Chantler's Hill (including a public footpath.) It should be treated as a local green space. This area is not marked on your local green spaces assessment.

Paddock Wood Primary School's playing fields, AS\_54, should be marked as a green space and protected.

**Wellbeing** - The accessible natural green space standard (ANGSt) recommends that everyone should have accessible natural green space of at least 2ha in size, no more than 5 minutes' walk from home... In the Tunbridge Wells green infrastructure framework for draft local plan item 40, gap analysis recognises this. In the table, the key access issues states that paddock wood has got very poor access. Following on from that, there should be one accessible 100 ha site within 5 km of "home" there is not one in Paddock Wood. Item 41 states that there is significant opportunity to provide for and address any shortfalls in natural green space provision, as part of the master planning process, according to green garden settlement principles. I would like to flag this to make sure that this actually happens.

The candidate local nature reserves, to the SW and E of PW will not meet this standard for those living in the NW of PW, so these conditions have not been met. The green wedges have not been adequately detailed to enable me to comment. However the one strip of land at the very east of Paddock Wood (PW1\_8) seems unsuitable as it is right between a solar farm and Queen Street.

TWBC already recognise that **air and noise pollution** is a downside to these developments.

My house in Paddock Wood is on the main road but semi-rural. I chose this house for peace and quiet. I have already been affected by the noise of Mascalls Court at the back of my property and subsequently the Church Farm development. Now I have the threat of more roads and houses being built, causing a huge amount of noise. This is not what I moved to Paddock Wood for! **Light pollution** will be a factor too - not just from street lamps, which will no doubt be low-pollution LED ones, but from vehicles on the road and the new houses and other buildings.

**Rural feel to Paddock Wood** - the green and Rural feel to the approaches to Paddock Wood, in particular from the south (from Brenchley) and West (from Five Oak Green) should be safeguarded and enhanced, as per PW's draft Neighbourhood plan. Policy G3 also states that 'development proposals that would lead to the join up of the built up areas of Paddock Wood and Five Oak Green will be resisted.' Tunbridge Wells Borough Council's local plan is based upon development to the west of Paddock Wood, which belongs to the east of Capel.

This totally goes against our Green infrastructure policy, therefore I am totally against the development to the East of PW.

**Heritage** - There is a huge development planned to the East of PW - possibly a 'neighbourhood centre.' There are listed buildings that will be surrounded by development areas on 3 sides, namely 1 and 2 Rose Cottages will be surrounded by PW1\_7, PW1\_8 and the Mascalls Court development. The row of 4 houses on this stretch of Church Road (of which mine is one) have been completely surrounded with development sites. The beautiful views of the countryside and historic farmsteads over the fields, which add to the financial value of the properties, will be ruined. Will homeowners be adequately compensated for this intrusion? Is it even legal for houses to be built in the area within the curtilage of these listed buildings?

Policy AL/PW4 states that the community centre will be placed on the Paddock Wood Memorial Playing Fields. This was purchased using donations by the people of Paddock Wood and then more recently, I am told that the deeds were transferred into PWTC's name.

Also the town had a poll, which stated that the residents were not in favour of the community centre at the PWMPF. This is not democracy and it is wrong. There are more suitable sites for the community centre.

The linear route of the historic railway line should be afforded protection against future development.

**Transport** - there will be an increased number of commuters, non-existent parking spaces, (AL/PW2,) more dangerous parking in residential roads, not enough seats on trains (issue with length of platform so rail companies will not be able to just add more carriages.)

**Sewerage** - Southern Water is already over capacity; antiquated and mixed type infrastructure cause back-ups and flooding when it rains; all waste water is coming through from Capel parish to PW's water treatment works in North-East Paddock Wood.

**Education** - Schools and transport to them (especially Tonbridge - e.g. Trains, Tudeley Lane)

Also TWBC state that further education is covered in Royal Tunbridge Wells - it really isn't!

On the Mascalls Court Farm development the new primary school has been put on hold, because it has been decided that it is not needed because potential numbers are too small.

**Agriculture** - With TWBC's plan, a large amount of grade 2/3 land will be lost, including some of Ribena's blackcurrants (PW1\_9.)

**Health provision** - Another GP surgery has been allowed for, but they do not take into account the lack of GPs in the NHS. NHS England have admitted to me that they cannot recruit GPs.

**Police** - Increase in population = increase in crime. TWBC want to double the population of PW so we should at least have a part time police presence. With the proposed demolition of the police station, we will have nothing.



**Sports provision** - A sports hub is planned between Five Oak Green and PW, which floods.

A cricket pitch would sink there - the lime would wash away. If TWBC/PWTC's plan for the Community Centre goes ahead, the PW Memorial Playing Fields will lose its cricket pitch. The tennis courts have already been closed 'for the Winter' (as at 2019) as they are in bad repair and dangerous. Will they ever come back in to use?

**Utilities** - There is currently no gas pipe serving East Paddock Wood - this, I assume would have to be installed at great cost, or other alternatives provided

This probably does not cover all of my feelings on these developments but I have spent hours poring over these documents.

I am very upset that the consultation was not made easy for people who find it difficult to respond, such as the elderly, infirm, those who have mental health problems, etc. I do not believe TWBC has served its residents at all well in this 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.**

Make a fresh plan, which takes into account the true housing need. Don't build on Green Belt, which is there to prevent urban sprawl.

## 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 home borders the East parcel of Paddock Wood. Furthermore, I am actively involved in the organisation Stop Overdevelopment of Paddock Wood.

## Future Notifications

**Please let us know if 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	Liz Simmonds [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Liz Simmonds [REDACTED]
Comment ID	PSLP_1933
Response Date	04/06/21 16:45
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Liz Simmonds
Question 3	
To which part of the Local Plan does this representation relate?	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 4a**

**If 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 looked at the proposed developments for Paddock Wood and have several concerns. I have tried to access the consultation online but it has been an absolute nightmare - unwieldy, unhelpful, bureaucratic and impossible. Is this how objections are curtailed?! Please advise if emails are not being taken into account for this consultation.

Whilst I fully appreciate the need for more use of walking & cycling, other factors need to be taken into account. Paddock Wood is a rapidly growing town. It has the potential to be a really good town with already a large secondary and primary school with good reputations, a sports centre (missing a much-needed swimming pool) and a shopping centre which provides nearly every thing you need.

1). Paddock Wood also serves the rural community and cutting off access by closing the bridge and closing car parks will make it much more difficult for these people to visit the town.

2) There is NO public transport for outerlying areas to use. There is currently 1 bus a week into Paddock Wood from Collier Street for example. It is too far to cycle particularly for the elderly population in villages.

3). By cutting access to Paddock Wood from the main road into the town means that large numbers of lorries will use (or try to) the small and entirely unsuitable country lanes.

4). In order for Paddock Wood to flourish people need to access the shops. This proposal will strangle commerce in the town. Apart from those who can walk others will go elsewhere. Tunbridge Wells might profit from this with its retail parks but Paddock Wood will struggle & quite possibly end up a dormitory town for commuters. It needs shops & restaurants.

5). Shutting Commerce Road last year was a complete disaster and I really can't see how it will be anything else. Again, where do people who have to come to the town by car actually park if the car parks are 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)?**

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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	Mrs Sue Lovell ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Stop Overdevelopment of Paddock Wood
Address	[REDACTED] [REDACTED] Tonbridge TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Stop Overdevelopment of Paddock Wood (Mrs Sue Lovell - [REDACTED] )
Comment ID	PSLP_1947
Response Date	04/06/21 16:54
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Stop Overdevelopment of Paddock Wood
Question 3	
To which part of the Local Plan does this representation relate?	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.

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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.**

(see web link)

This Change.org petition has been signed by Paddock Wood residents, businesses and supporters, as follows:

"Tunbridge Wells Borough Council are about to consult (Regulation 19) on their new Local Plan. In this, they plan to place over 50% of their new housing allocation in Paddock Wood and East Capel, assimilating the two. Paddock Wood should perhaps be 'grateful' that the planned number of new houses has been reduced to 3.6K. However, this is in addition to the 1000+ already in progress over the 3 recent consented developments.

The plan states that TWBC desire public engagement and involvement, to 'include consideration of how the natural and historic environment of the local area is reflected and respected' yet the overwhelming response they received during the Regulation 18 in 2019 consultation have been mostly ignored.

The plan will include building on some of the best farmland in the borough, removing hundreds of trees and building on the floodplain around Paddock Wood, where many properties already suffer from surface water **flooding**.

**Flooding** - TWBC want 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. 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 which are assisting to disperse the run-off, but if these are developed the situation will be exacerbated. The recently-started Church Farm development has already exacerbated Paddock Wood's flooding issue; indeed the developers have removed a number of mature oak trees, which were not mentioned in the original plans. Mature oaks can draw up 50 gallons of water per day, so any further development will significantly impact the environment, including the flooding issues, not to mention the ecological impact.

**Biodiversity** - wildlife and plants. Countless creatures will lose their habitat. Save Capel have done their own biodiversity report which can be found here: (see web link)

**Green Belt land** - an exceptional reason is needed to build upon green belt land. It is important to avoid 'urban sprawl' and its loss will effectively cause Tonbridge to join up with Paddock Wood. 407.576ha of Green Belt land will be de-designated. That's 5.71% overall green belt in the borough, with 148.194ha of this being PW/East Capel.

Sevenoaks has already had its local plan rejected by the government due to this.

**Wellbeing** - The accessible natural green space standard (ANGSt) recommends that everyone should have accessible natural green space of at least 2 hectares in size, no more than 5 minutes' walk from home... The candidate local nature reserves, to the SW and E of Paddock Wood will not meet this standard for those living in the NW of Paddock Wood.

TWBC already recognise that **air and noise pollution** is a downside to these developments. **Light pollution** will be a factor too (not just from street lamps, which will be low-pollution LED ones.)

**If TWBC is successful and this local plan goes ahead, residents will be subjected to continuous development for the next 15-20 years.**

**Sports provision** - A sports hub is now planned for the East side of Capel, with no associated building, i.e. no changing facilities. This area is in flood zones and is also inappropriately located for Paddock Wood residents, especially if they have no private transport.

**Roads/Transport** - The infrastructure will not be suitable for such an increase in population, without major disadvantages to residents. We are a small rural community, with narrow country lanes, which are already being used by unsuitable HGV traffic - this can only get worse over the next 15-20 years with 350 homes being planned every year, especially with an increased number of commuters vying to get to the railway station. There will be fewer parking spaces to go round, which will lead to more dangerous parking in residential roads. 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.

We also envisage a negative impact on **community services**. Our local police station is being sold off for development, but an increase in population = an increase in crime. TWBC wants to double the population of Paddock Wood, so we should at least have a part time police presence. With the removal of the police station, we will have nothing.

**Health Provision** - Our GP surgery is already over-subscribed. A new surgery has been promised but with fewer doctors taking up general practice, we fail to see how this will be staffed.

**Housing need and type** - The latest calculations show that much less housing is actually needed (some sources have said it's almost half!) 'Affordable' housing is rated at 80% of market value and Social housing is 60% of market value - but how many local people will actually be able to afford these homes? Homes on the current new developments are already being marketed with a 1-bed apartment at £252-275K. How many local people on low incomes can afford to buy a £200K 'affordable' flat? These are being marketed to people nationwide through Sage Housing. We are open to some new housing in our town and villages to provide housing for the local community but the disproportionate allocation to our area is unfair, unnecessary and environmentally disastrous.

**This plan is not demonstrably sound and, we would suggest, not legally compliant.**

Tunbridge Wells Borough Council needs to appreciate the scale of opposition to this development. Please sign this petition to help us become a voice they can hear.

We would like to encourage all residents of Paddock Wood to act now and write to their local borough councillors - details can be found at [www.writetothem.com](http://www.writetothem.com) We also need proactive help to help organise the campaign over the Regulation 19 consultation. If you would like to join our Facebook group, head over to (see web link) which will give you the most up to date information on how we are progressing.

We, the respondents to this petition respectfully ask that considering the points mentioned, and the fact that this plan is overwhelmingly unpopular with residents and councillors alike, TWBC reconsider pressing forward with this process and rethink the local plan and its alternative options."

**816 have signed as at 04/06/2021**

## 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.**

Take respondents' views into consideration.

Make a fresh plan, which takes into account the true housing need. Don't build on Green Belt, which is there to prevent urban sprawl.

### 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:**

Stop Overdevelopment of Paddock Wood is an unincorporated residents' association and needs to be actively involved in the planning Paddock Wood.

### Future Notifications

**Please let us know if 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\_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_1988
Response Date	02/06/21 15:17
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7
Files	<a href="#">DHA Planning for Inter-Leisure Ltd full representation and SI.pdf</a>
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/PW 1 The Strategy for Paddock Wood

*[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**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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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**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**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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.**

## **1.6 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.

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**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	Stephen Hicks ( [REDACTED] )
Email Address	[REDACTED]
Address	[REDACTED] Tonbridge TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Stephen Hicks ( [REDACTED] )
Comment ID	PSLP_2002
Response Date	04/06/21 13:05
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KH
Question 1	
Respondent's Name and/or Organisation	Stephen Hicks
Question 3	
To which part of the Local Plan does this representation relate?	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 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.

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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.**

Page 167-168 mention infrastructure. The current three developments are proceeding however the plans around water infrastructure / flood control have not been closed out. I believe that discussions with the water company were not effectively closed out before the start of building. Given the well-known issues with flooding in areas of Paddock Wood, the infrastructure plan must be reviewed and a consolidated plan of works put in place before any further works (or phases of build) are allowed. The situation that has been allowed to develop indicates roles and responsibilities (and accountability) for the successful execution of a full remediation with the water company and building firms need urgently reviewed.

#### 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 infrastructure work (water – waste – flood prevention) needs to be completed prior to any further work being allowed. The work must not utilise existing pipework given it is not “fit for purpose” and needs resolving prior to any further build work commencing.

#### 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.**

In terms transport, previously the rail firms had considered having trains run “fast” and not stop at stations such as Paddock Wood. This would have a serious impact on sustainability. It would also suggest that potential new stations at Capel would not be a serious option.

### **Future Notifications**

**Please let us know if 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	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_2059
Response Date	04/06/21 16:05
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
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/PW 1 The Strategy for Paddock Wood	
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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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

**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\_144

## Comment

Agent	Mrs Jane Piper ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Barton Willmore
Address	26 Kings Hill West Malling ME19 4AE
Consultee	( [REDACTED] )
Company / Organisation	Crest Nicholson
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Crest Nicholson ( [REDACTED] )
Comment ID	PSLP_2072
Response Date	04/06/21 15:53
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-10 Appendix 3 Fig.5 Visual Appraisal Plan</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-11 Appendix 3 Fig.6 Opportunities &amp; Constraints Plan</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-4 Appendix 3A.1</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-2 Appendix 2 Flood Risk &amp; Drainage Overview</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-9 Appendix 3 Fig.4 Site Appraisal Plan</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-3 Appendix 3 Landscape &amp; Visual Assessment</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-6 Appendix 3 Fig.1 Site Context Plan</a> <a href="#">PSLP_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-1 Representation &amp; Appendix 1 Site Plan</a>

[PSLP\\_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-5 Appendix 3A.2](#)  
[PSLP\\_2064, 2066-2074, 2077 Barton Willmore for Crest Nicholson SI-7 Appendix 3 Fig. 2 Topography Plan](#)  
[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-8 Appendix 3 Fig. 3 Landscape Character 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-14 Review of Sustainability Appraisal](#)

Data inputter to enter their initials here 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/PW 1 The Strategy for Paddock Wood

*[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: . 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: the following paragraphs are relevant extracts from the representation. For the full representation and appendices, please see supporting documents]*

**Policy STR/PW1: The Strategy for Paddock Wood and Page 166**

**Not justified or effective.**

4.123 For clarification, the section title on p.166 and the title of Policy STR/PW1 should be ***“The Strategy for the Parish of Paddock Wood”*** as it is in the Index of Policies.

4.124 Policy STR/PW1 1. and 2. should be **deleted** and redrafted as supporting text at the beginning of the section, as other policies refer.

**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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**Suggested Modifications**

4.125 For clarification, the section title on page 166 and the title of Policy STR/PW1 should be ***“The Strategy for the Parish of Paddock Wood”*** as it is in the Index of Policies.

4.126 Policy STR/PW1 1. and 2. should be deleted and redrafted as supporting text at the beginning of the section, as other policies refer.

**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.

**Future Notifications**

**Please let us know if 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_2173
Response Date	04/06/21 09:43
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PSLP_2159-2198_Judith Ashton Ass for Redrow Homes</a> <a href="#">PSLP_2159-2198_Judith Ashton Ass for Redrow Homes (1)</a>
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/PW 1 The Strategy for Paddock Wood

[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 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 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/PW1

8.7 Whilst supporting this policy generally, we have 2 comments upon the details contained within it. The first relates to point 5 and the delivery of a two-form entry expansion to the existing Mascalls Secondary School. Whilst land is being reserved for this facility, we would seek clarification from KCC that this facility is still required/ that the schools plans have not changed with regard to how future needs are to be addressed as we have heard anecdotal evidence that would call this requirement into question. TWBC thus need to justify this requirement.

8.8 The second point relates to criterion 10 and the reference to the Strategic Sites Masterplanning and Infrastructure Study February 2021 (or a version of this as amended); which as set out above should be subject to consultation with all relevant parties before any amendments to are adopted so as to establish the implications of the proposed changes for those promoting these sites/ ensuring the local community have a chance to have their say on what is being amended and why.

**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 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:**

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\_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_2199
Response Date	04/06/21 16:56
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Kent County Council-full representation.pdf</a>
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/PW 1 The Strategy for Paddock Wood

[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 requests that the policy includes reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area.

#### 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	Mr Raymond Moon ( )
Email Address	
Address	 Paddock Wood TN12
Event Name	Pre-Submission Local Plan
Comment by	Mr Raymond Moon ( )
Comment ID	PSLP_2292
Response Date	02/06/21 14:54
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Raymond Moon
Question 3	
To which part of the Local Plan does this representation relate?	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	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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information 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.

#### Section5: Place Shaping Policies Introduction

#### Paddock Wood

#### Pg 166. The Strategy for Paddock Wood.

**5.239** This paragraph clearly states the importance of identifying the flood risk in the area and the importance to recognise this when agreeing planning applications and the policies in this DLP. The most risk is North of the railway and no residential development should be allowed in this allocation as in previous Local Plans with only commercial development being acceptable.

**5.240** The release of the GBL west of Paddock Wood and none of the exceptional circumstances justify this release set out in Policy STR/SS 1. The only justification is to allow the allocation of new dwellings to meet the TWBC allocation and the unchallenged Government Allocation.

**5.241** This is a false statement regarding the number of presently agreed houses which is at least 1400 new dwellings within the last Local Plan. It should also take into account the number of windfall houses built in PW during that time and the pressure put on the existing inadequate infrastructure.

**5.242** The significant growth planned for PW 3,490-3,590 dwellings will significantly change the existing character of the Town and is not sustainable as regards the present provision of medical facilities and capacity at the primary school and Mascalls School. The present Town centre will also not be able to sustain the new houses. In short the allocation is disproportionate to the overall TWBC allocation and this document seeks to justify the figures by false statements and attached documents. The number was picked out the sky and then make it sustainable.

**5.244** There is frequent mention of a Masterplan through out this whole document to again support the allocation of 3,590 houses and there is no detail of the plan and the legal requirement put on developers and other utilities and stakeholders in the Town. A previous masterplan was promised for PW and it did not happen. The detail of the masterplan must be presented and agreed in this DLP.

#### Policy STR/PW 1

#### The Strategy for Paddock Wood

- 1 Mention is made to Affordable housing but no mention of the need for Social housing as we come out of the Pandemic. The affordable housing in PW not affordable to many residents even with the present TWBC policy on its provision to developers. The TWBC is missing its target on this provision. We need more Social housing.
- 2 Flood mitigation at present on the existing new developments predominantly relies on drainage ponds which is not sustainable in the future as we experience Climate Change and more extreme

weather events. The fact is they are being built on high Flood risk areas and should not be allowed. There has to be a limit to how many houses that are sustainable within the present infrastructure.

- 3 No mention is made to protection of Foal Hurst Wood nature reserve owned by PWTC as more houses are built around its boundary. Light pollution is a major threat to the present wildlife that exist in the wood including resident Dormouse.

#### **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	Mr Raymond Moon ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Paddock Wood Labour Party (PWLP)
Address	[REDACTED] TONBRIDGE TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Paddock Wood Labour Party (PWLP) (Mr Raymond Moon - [REDACTED] )
Comment ID	PSLP_2315
Response Date	02/06/21 15:02
Consultation Point	Policy STR/PW 1 The Strategy for Paddock Wood ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paddock Wood Labour Party
Question 3	
To which part of the Local Plan does this representation relate?	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	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.

#### Section5: Place Shaping Policies Introduction

#### Paddock Wood

#### Pg 166. The Strategy for Paddock Wood.

**5.239** This paragraph clearly states the importance of identifying the flood risk in the area and the importance to recognise this when agreeing planning applications and the policies in this DLP. The most risk is North of the railway and no residential development should be allowed in this allocation as in previous Local Plans with only commercial development being acceptable.

**5.240** The release of the GBL west of Paddock Wood and none of the exceptional circumstances justify this release set out in Policy STR/SS 1. The only justification is to allow the allocation of new dwellings to meet the TWBC allocation and the unchallenged Government Allocation.

**5.241** This is a false statement regarding the number of presently agreed houses which is at least 1400 new dwellings within the last Local Plan. It should also take into account the number of windfall houses built in PW during that time and the pressure put on the existing inadequate infrastructure.

**5.242** The significant growth planned for PW 3,490-3,590 dwellings will significantly change the existing character of the Town and is not sustainable as regards the present provision of medical facilities and capacity at the primary school and Mascalls School. The present Town centre will also not be able to sustain the new houses. In short the allocation is disproportionate to the overall TWBC allocation and this document seeks to justify the figures by false statements and attached documents. The number was picked out the sky and then make it sustainable.

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#### Policy STR/PW 1

#### The Strategy for Paddock Wood

- 1 Mention is made to Affordable housing but no mention of the need for Social housing as we come out of the Pandemic. The affordable housing in PW not affordable to many residents even with

the present TWBC policy on its provision to developers. The TWBC is missing its target on this provision. We need more Social housing.

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#### **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)?**

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Paddock Wood:  
Policy AL/PW 1: Land at Mascalls  
Farm**

## 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_2200
Response Date	04/06/21 16:56
Consultation Point	Policy AL/PW 1 Land at Mascalls Farm ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Kent County Council-full representation.pdf</a>
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 AL/PW 1 Land at Mascalls Farm

*[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 requests direct reference to Public Footpath WBT268.

#### 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	Mr Raymond Moon ( [REDACTED] )
Email Address	[REDACTED]
Address	[REDACTED] Paddock Wood TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Mr Raymond Moon ( [REDACTED] )
Comment ID	PSLP_2293
Response Date	02/06/21 14:54
Consultation Point	Policy AL/PW 1 Land at Mascalls Farm ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Raymond Moon
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy AL/PW 1 Land at Mascalls Farm	
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.

##### Allocation policies for Paddock Wood

##### Land at Mascalls Farm (AL/PW1)

**5.253** The protection of Foal Hurst Wood and the link to Brick Kiln Wood should be included to protect the present Dormouse population in FHW.

**5.255** The site allocation of 400 homes is over intensive and unsustainable within the DLP

**5.256, 5.257** These statements highlight the probability that the allocation of 3,590 will be exceeded as the duration of the plan progresses and the limit of 3590 must not be breached.

##### Policy AL/PW 1

##### Land at Mascalls Farm

This development already has planning permission so why is it in the DLP and appears to be open to consultation, it is 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)?

## Comment

Consultee	Mr Raymond Moon ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Paddock Wood Labour Party (PWLP)
Address	[REDACTED] TONBRIDGE TN12 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Paddock Wood Labour Party (PWLP) (Mr Raymond Moon - [REDACTED])
Comment ID	PSLP_2316
Response Date	02/06/21 15:02
Consultation Point	Policy AL/PW 1 Land at Mascalls Farm ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Paddock Wood Labour Party
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy AL/PW 1 Land at Mascalls Farm	
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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##### Allocation policies for Paddock Wood

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##### Policy AL/PW 1

##### Land at Mascalls Farm

This development already has planning permission so why is it in the DLP and appears to be open to consultation, it is 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)?

# 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_1874
Response Date	04/06/21 11:43
Consultation Point	Policy AL/PW 1 Land at Mascalls Farm ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7
Files	<a href="#">C Richards - Supporting Information - map A.JPG</a> <a href="#">C Richards - Supporting Information Map B.jpg</a> <a href="#">C Richards - Supporting Information - section A and section C.JPG</a> <a href="#">C Richards - Supporting Information - table A.JPG</a>
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 m<sup>3</sup>. (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

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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 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

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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	[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_1234
Response Date	03/06/21 15:31
Consultation Point	Policy AL/PW 1 Land at Mascalls Farm ( <a href="#">View</a> )
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	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Policy AL/PW 1 Land at Mascalls Farm	
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. 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. Our previous assessment of the site was only valid for 12 months due to our sewer network constantly evolving as new development connects upstream which will affect the available capacity downstream. The assessment reveals that existing local sewerage infrastructure 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 new wastewater infrastructure.

Proposals for 413 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).

This site incorporates Southern Water's Badsell Road Paddock Wood Pumping Station (WPS). In order to mitigate any noise and/or vibration generated by its essential operation, a 15 metre gap between the pumping station and any residential dwelling would be required.

#### 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 be added to Policy AL/PW 1

Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout.

#### 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