

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

4.0 Paddock Wood strategic growth

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

**Yes                      No**

**Legally Compliant** Not Selected Selected

**Sound**                      Not Selected Selected

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

Please see representations attached

**Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see representations attached

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

As a resident in Paddock Wood all my life and during that time also as a Paddock Wood Town Councillor for over 30 years, I have seen the once village and Parish grow to a small Rural Town designation. Within that time the population has grown with the thousands of new houses in the town from the 1960s to the present day. It is also fair to say that the Infrastructure has not kept pace with this expansion with little capital build to cope with this future growth. The formation of the Local Plan resulted in the public hearings in 2022 of which I participated and made various contributions and indeed would like to appear in any future hearings concerning the Local Plan.

The main Proposed changes relating to Paddock Wood (PW) include the reduction of 1000 houses and any new residential build on Flood Zone 1 only. The Sports Hub recommended within the Paddock Wood Neighbourhood Plan be removed and proposed improvements to various sports facilities around the Town. Also Secondary Education provision was to be reduced due to the reduction of 1000 new houses included in the Local Plan.

The Capel & Tudeley Village removal from the plan would result in 2,800 less houses and provide instead, of a 15 year supply, only a 10 year supply after this present Local Plan process has finished.

This will result in an immediate Call for Sites in and around PW and more houses and no active and viable Masterplan to build the required infrastructure for PW to cope.

**[TWBC: The following should go under 3.0]**

The inspectors report clearly states that there are some issues to address concerning the viability of the Garden Village in reference to the highways issues and aspects of inclusion of the Green Belt and indeed lists at great length the following options to TWBC:

He goes on, at paragraph 96, to identify three options for the Borough Council to consider. *“They are:*

- *Provide additional information to justify the Tudeley Village allocation as submitted.*
- *Modify the submitted Plan by making significant changes to the Tudeley Village allocation, and in doing so, seek to overcome the soundness issues identified above.*
- *Delete the allocation from the submitted Plan*

3 issue areas where identified, Location and Accessibility, The Five Oak Green By Pass, and Deliverability and even a small reference is made to the Hadlow Estates response to the TWBC response to the Inspectors letter.

It is clear that the removal of the Tudeley Garden Village was a political decision to remove 2,800 houses from the Local Plan and the easy option regarding the issues raised by the Inspector which could have been addressed and still keeping the Garden Village on the “table”

The Hadlow Estate stated “we still believe and believe today that bringing forward this community (Garden Village) through the Local Plan was the right thing to do, not least for the current and future generations who want nothing more than a decent place to live”

“A long-term solution to the housing crisis requires long-term planning and decision making. A draft Local Plan with the allocation for the Tudeley Village removed would represent a missed opportunity to bridge the generation divide between those that have a home they call their own, and those that do not”

The inclusion of a Garden Village has clear objectives and advantages.

1. It enables the DLP to have a 15 year plan and a more managed call for sites in the future in and around PW. **The removal of the Tudeley village will only deliver a 10 year plan not supported by the Inspector in his letter to TWBC.**
2. It addresses the decline in UK home ownership for those aged 25-34
3. New home delivery is falling and availability is less affordable in Rural Areas.

A new village settlement would have delivered new Infrastructure:

1. A new Foal Water and Surface Water Network designed to manage more extreme climate events and climate change.
2. New roads, streets and cycle networks designed to integrate with the existing Highways network
3. New schools, New General Practice Access and other infrastructure in the area.

A long term solution to the housing crisis requires bold and long term decisions. I accept that no location is 100% perfect , but the Tudeley village was well researched and planned and would have delivered over 2,800 houses. Logically the Tudeley Settlement remains the best option for the whole Borough. Sevenoaks District Council also recognises the benefits of a new village and has a proposal in its Local Plan for 2,000 + new houses.

TWBC has taken the easy option rather than the “Logical Choice” forward and regrettably PW

**[The following should go under Strategy and Implementation]**

**Strategy and Implementation**

4.6 Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is surrounded by some land which, uniquely for Tunbridge Wells, is outside the Green Belt and AONB. The Inspector therefore agrees with the Council in concluding that the strategy for growth at Paddock Wood represents a ‘logical choice’.

**Review of the allocation in light of the Inspector’s initial findings**

4.14 “The Council considers that the work undertaken on masterplanning is thorough and extensive and, whilst under some circumstances, an SPD could take some time to draft, consult on, and adopt, meaning that the speed to which associated housing may come forward could be delayed, much of that work is in place and it is anticipated that the process of adoption of the SPD would keep pace with the adoption of the Local Plan in order that its adoption might be either aligned to the same timeframe or very soon afterwards.”

4.14 The TWBC reliance on a Supplementary Planning Document SPD is recognised within its response to the Inspectors Letter and suggests that public consultation could be speedy to implement within this consultation and previous submissions in the original DLP inquiry . The assumption is that the Masterplan is working from the Inspectors original conclusion but to date it has failed to deliver. The present planning applications relating to new Housing development from the old “ Elm Tree” Pub towards Queen Street includes provision for a Private Foal Water Sewage Network on site far from the principles of Master Planning to ensure all this Infrastructure is in place for future development in PW included in the response to the Inspectors letter.

4.16 “Further consideration is given below in relation to the various substantive matters raised by the Inspector” I challenge this and that the TWBC response has indeed not addressed the “ substantive” matters the Inspector refers to within the concept of Master Planning in PW and planning for the future. It is also clear that the again the assumption that the TWBC has adopted Garden Settlement Principles for PW is not proven with its response. If the same principles where applied then the Tudeley Garden Village would be still on the table so why is it ok for PW?

**[The following should go under Flood Risk and Housing]**

4.17- 4.28 It is clear within the NPPF that TWBC has failed to apply a Sequential Test and Exceptions Test regarding the proposed new development in PW and highlights a fundamental flaw in the argument that the flooding risk has been removed via the Masterplanning. The stated flood assessments from the TWBC within the Master Planning are flawed and do not take into account the proposed new build in Flood Zone 1 and how that relates to Flood Zones 2 & 3 with the new modelling and the need to mitigate surface water flooding directly on the proposed new development sites.

There are clear flood areas in PW including Gravelly Stream which in Paddock Wood runs along the western side of Paddock Wood and crosses Badsell Road by culvert. Historically this stream has flooded over the years. Water from Tudeley Brook Stream has been diverted into Gravelly Stream resulting in a blocked culvert under the railway resulting in flooding in Laxton Gardens, Ribston Gardens and parts of Allington Road. Considering the potential early Call for Sites in PW as the result of only a ten year plan, TWBC have not addressed this in responding to the Inspectors Letter.

The proposed new development at Queen Street by Redrow and Persimmon, previously mention near the old " Elm Tree" Pub presents serious issues for Paddock Wood and the Rhoden Stream. Over recent years with already new housing, Rhoden Stream has been asked to cope with new houses on Green Lane, and of late in Church Road ie Church farm. Rhoden Stream is reaching saturation point. The Masterplan has not delivered any infrastructure improvements along these crucial watercourses around PW.

Without a clear Masterplanning approach, it has resulted in the Swatlands Employment Site to be approved before the Local Plan is adopted. The new flood risk evidence indicates that this site might not have been approved had the Council followed the evidence and the requirements of the NPPF.

4.29 "The original reduced development option of housing outside of flood zones 2/3 (Option 3) comprised 2,840 dwellings, which in itself was a reduction of 610 dwellings from the full-scale growth option progressed to examination (Option 1 – 3450 dwellings). The newly developed revised 'Option 3' would represent a further reduction of 308 dwellings from that original 'Option 3' and demonstrates the extent to which the development parcels have altered as a result of the updated flood modelling which has been undertaken"

It is welcome that the Inspector recognised that any future development in PW has a high flood risk and suggested and agreed by TWBC that new houses should only be built on Flood Zone 1. This has materialised by the TWBC proposing a reduction of 1000 houses but there is still a proposal of over 2,600 new houses in PW from the original Inspectors enquiry and subsequent letter of response. Regrettably there is no reference made in the Master Planning that proposed building on Flood Zone 1 has the potential with Climate change to appear in Flood Zones 2 & 3 in the future thus putting at risk again a proposed 10 year Draft Local Plan. A short term solution to placate a response to the Inspectors letter and justify removal of the Tudeley Garden Village. The losers would be PW residents in the long term coping with increased flooding risk in the present Flood Zone 1.

It is clear that within the TWBC response to the Inspectors letter that the Masterplan again is not working with the lack of a sound update to the Flood Risk mitigation and any substantial improvements to the Infrastructure to cope with a 10 year Plan and the subsequent Call for Sites required after this present Draft Local Plan Consultation.

**[The following should go under Sports and Leisure provision]**

4.53 – 4.61 It is noted that the Sports and Leisure Hub has been deleted within the TWBC response to the Inspectors letter and replaced with various enhancements to existing sports facilities around the town, including Putlands indoor activities and the Athletics track on the Putlands sports field. The justification for this change is that there are 1000 less houses within PW in the TWBC response.

The suggested enhancement programme totally ignores the Paddock Wood Neighbourhood Plan (NHP) where future sports provision was provided for by the inclusion of a Sports Hub. With 15 years being reduced to a 10 year plan the predicted Call for Sites in and around PW will potentially see a projected 9,000 new residents in PW in the next ten years. This is double the present

population to over 17,000 people in PW, a clear need for a Sports Hub in the Town. The argument is clear within the Neighbourhood Plan that rather than “Sticking Plaster “ solutions the future is the provision of a new Sports Hub in the ever expanding Town. A logical future as the town grows.

As regards engagement with PWTC and the residents there is a fundamental failure to ensure that the decision to take the Sports Hub off the table within the NHP was not actively shared with PWTC with adequate consultation. The logical question is regarding the principles of a NHP why was the Sports Hub removed knowing that within the near future there is an undeniable need in the Town for a new Sports Hub. The recent provision of the New Community Centre has been in the making for many years in PW and the shelving of the Sports Hub now will only delay it for the future. The confidence in the concept of a NHP will also be damaged if the Hub is axed. I ask the TWBC to review its decision and discuss and engage with PWTC and plan for the near future.

**[The following should go under 5.0 Transport Related matters]**

5.15 Mention is made of a draft “ Bus Feasibility Study” to service the expanding population and access to the Town Centre regarding existing bus routes and a potential new service to serve the new housing in PW. This inclusion is inadequate and lacks a coherent strategy and deliverable solution. A similar scheme was proposed regarding the Green Lane development and the service collapsed after 2 months! The new bus route is not deliverable by TWBC but is within the remit of KCC Highways and other stake holders such as Arriva bus company. There is no sound evidence that discussions have taken place on this proposal within the TWBC response and the Masterplan.

Transport enhancements including the Railway Bridge pinch point are mentioned and suggested but the major stake holder Network Rail has not been engaged in any meaningful discussions with TWBC or even with PWTC. The Masterplan proposes new crossing points over the railway for the future regarding walking and cycling but again no meaningful engagement with Network Rail to date.

The planning for PW Town centre appears not to take into account the predicted number of houses over the next ten years around PW and the ability to serve that increasing population.

It appears the decision to scrape the 2,800 Tudeley Village and the 1000 houses in PW has been decided then the justification built around that decision rather than linking with the Masterplan for PW and discussions with PWTC and the residents of PW.

**[The following should go under 14.0 Commitment to early review]**

**Conclusion and Summary**

Since the TWBC response to the Inspectors Letter the NPPF has undergone some amendments particularly regarding the ability of Local Authorities to be able to be flexible in determining the actual housing need in the whole Borough. Part of this is to “ meet as much of an areas identified housing need as possible”. It is clear that TWBC is mis interpreting this by allocating an unfair proportion of new housing to PW in relation to the whole Borough. The burden on existing Utilities and services in the Town, including Flooding and Foal Water/Sewage provision and services such as schools and GP provision are not able to cope within the present infrastructure in and around the Town and with the increase in predicted population even less likely to cope.

Even with a reduction of 1,000 new homes the TWBC still allocates 2,600 new houses for PW in the Draft Local Plan. This is even more unsustainable as the Draft local Plan is for 10 years only when the Inspector recommended a 15 year plan. After the ending of the present consultation regarding this Draft Local Plan an immediate “ Call for Sites” will be required from TWBC to meet its present

housing need across the Borough. The logic unfortunately will lead to the door of the present land owners around PW and not those in around the town of Tunbridge Wells. The high proportion required from PW is unfair and will dramatically change the whole identity of PW from a small parish village to a Middle size rural town.

The TWBC has missed the opportunity to be bold and further the sound logic of having a new Garden Village in the Borough and place the burden of its removal on the residents of PW with this Draft Local Plan.

The TWBC has not progressed any sustainable Infrastructure improvements in PW within the present Masterplan only words on services it does not provide or improvements , regarding Sports facilities and the Town Centre.

The provision of a 10 year plan fails the residents of the Borough and the residents of PW. Future growth has been compromised across the Borough with PW again being “ the logical area of growth” in the Borough. Ask any resident regarding this statement and they will reply only those that do not live in PW will agree with this statement.

The clear opportunity to create a purpose built and sustainable infrastructure within its boundaries regarding a new Garden Village has been missed. Sevenoaks District Council saw this logic and has included a 2,000 new Village concept in its Local Plan.

The Draft Local plan should be about the Common Good for all residents across the Borough and not just for PW and other isolated sites. The TWBC Response to the Inspectors Letter and its decisions are biased and flawed against all the residents of PW and any future population growth in the Town. The easy options have been made and the burden of these have been placed on PW for the future.

The delays in the provision of a Draft Local Plan are regrettable and are having profound consequences with the Planning decisions being made by TWBC but a Draft Local Plan not fit for the future is not the answer at the expense of the Future of PW and its Rural Identity as explained in my contribution to this present consultation.

For the reasons explained I object to the TWBC response to the Inspectors letter.

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

Yes, I wish to participate at the examination

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

As a concerned resident of Paddock Wood for over 50 years I wish to participate in any future hearings on the Local Plan as the Town is constantly having to cope with more housing without adequate Infrastructure in place , the increased risk of flooding and the concerns that the Masterplanning in place will not safeguard the whole complex nature of Paddock Wood as a community in the future.