



**Tunbridge Wells  
Borough Local Plan (2020 – 2038)**

**Main Modifications Consultation  
Representation Form**

**Please use a separate form/sheet for each  
representation/main modification**

Ref:

(For official  
use only)

We welcome your comments on the Tunbridge Wells Borough Local Plan Main Modifications Consultation.

The consultation also includes a number of other documents as listed in Box 1 below upon which representations can be made, including an updated Sustainability Appraisal and updated Habitats Regulations Assessment.

Completed forms must be received at our offices by midnight on **Wednesday 30<sup>th</sup> April 2025**.

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: [LocalPlan@TunbridgeWells.gov.uk](mailto:LocalPlan@TunbridgeWells.gov.uk) or print them off and send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please refer to the [Guidance Note on Making Representations](#) for further information. The Guidance Note explains the soundness tests and statutory plan making requirements relevant to this consultation.

**PART A – CONTACT DETAILS**

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title		Mr
First Name		Troy
Last Name		Hayes MRTPI
Job title (where relevant)		Founder & Managing Director

<b>Organisation (where relevant)</b>	<b>Paddock Wood Town Council</b>	<b>Troy Planning + Design</b>
<b>Address Line 1</b>		<b>33 Foley Street</b>
<b>Address Line 2</b>		<b>London</b>
<b>Address Line 3</b>		
<b>Postcode</b>		<b>W1W 7TL</b>
<b>Telephone number</b>		<b>0207 0961 329</b>
<b>Email address (where relevant)</b>		<b>info@troyplanning.com</b>

## **PART B – YOUR REPRESENTATION**

**(Please use a separate form/sheet for each representation)**

<b>1.</b>	<b>Name of the Document to which this representation relates (please tick):</b>
<b>X</b>	<b>Schedule of Proposed Main Modifications</b>
	<b>Sustainability Appraisal (Part 2)</b>
	<b>Habitats Regulations Assessment (Part 2)</b>
	<b>Schedule of proposed Map Changes (Policies Map/Inset Maps)</b>

<b>2.</b>	<b>To which part of the document listed in Box 1 above does this representation relate to?</b>
<b>If Main Modification (please quote number e.g. MM1)</b>	MM81
<b>Chapter and (if applicable) subheading</b>	
<b>Policy/Paragraph number</b>	

<b>3.</b>	<b>Do you consider the Main Modification / document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):</b>
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3.1	Legally Compliant	Yes		No	X
3.2	Sound	Yes		No	X

4.	<p><b>Please give details of why you consider the Main Modification/document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this.</b></p> <p><b>Or</b></p> <p><b>If you wish to support the legal compliance or soundness of a main modification/document, please also use this box to set out your comments.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
<p><b><u>Main Modification MM81 – Policy STR/SS 1</u></b></p> <p>PWTC raised numerous soundness concerns with the wording of Policy STR/SS 1 (The Strategy for Paddock Wood including Land at east Capel) as previously worded. The policy text has been re-written, however, many of these soundness concerns raised by PWTC remain of concern. We have highlighted the most important issues below, as we consider that these contribute to an unsound policy wording.</p> <p><b>Development Principles</b></p> <ul style="list-style-type: none"> <li>• The proposed ‘<b>limits to built development</b>’ for the Green Belt area west of Paddock Wood are unaltered despite a reduction of circa 1,000 dwellings and the newly added paragraph 7 regarding residential development which shall be within Flood Zone 1 only. This is incongruous with the flood risk evidence and the parameters for residential development within the policy, which reduce residential developable areas regarding flood risk, but not other uses. Furthermore, it does not adapt the limits to built development in general and the Green Belt boundary in light of the reduction of housing numbers.</li> <li>• Despite this requirement for ‘<b>garden settlement principles</b>’, there is no clear definition for what ‘garden settlement principles’ shall be embedded in the development proposals. Is it the list of principles in paragraph 5.187 in the Pre-Submission Local Plan? If that is the case, then it needs to be referred to here and a policy should be added to the Local Plan setting this out. It is still unclear how these Principles were developed by TWBC. Furthermore, how have the garden settlement principles been accounted for in the Viability Study? There is no mention of these in the Viability Study let alone costs assumed for ensuring the</li> </ul>	

principles are achieved in the future proposals which would clearly result in additional development costs.

- Clause a) refers to the **mix of housing** and it states that the development proposals as a whole shall provide a mix of housing types, size, and tenure in line with Policy H1. However, the first paragraph of Policy H1 uses almost the same wording as clause (a). The second paragraph simply refers to relevant Local Plan or Neighbourhood Plan policies for the area. We do not see any other local plan policies that provide more detail. The Paddock Wood Neighbourhood Plan Policy PW H11 (Housing Type and Mix) also refers to the requirements of the Local Plan. Policy H1 of the Local Plan then states that requirements may be informed by 'intelligence' such as 'local planning evidence base' 'parish housing surveys' and 'other relevant analyses'. This results in a 'circular' policy that is ineffective.
- Clause b) refers to the delivery of '**mixed communities**' but does not define what this means. It only specifically mentions accommodation for those with different accommodation needs, including the needs of older people. Are there any other types of accommodation that need to be listed here? What is the need based on? It then requires 'at least' one sheltered and one extra care housing scheme, one in the east and one in the west. This does not provide any details regarding the scale of older persons' provision and how it might meet any identified needs. What is meant by 'one on the east and one on the west' – which parcels is this referring to? Who will oversee these housing types? Will these be KCC run or private or mixed? This policy clause would be ineffective in the absence of clarity and an unambiguous language of the expectations in terms of 'mixed communities' and typology, scale, and parcel location of extra care housing schemes.
- Clause c) requires that a '**landscape-led**' approach be taken, which the Town Council supports. To help clarify what is meant by 'landscape led' and therefore for the policy to be effective, we consider more information is required defining 'landscape led'. We note that this term is also used in Policy STR 8 of the Local Plan. This clarification and elaboration of the term should be provided in the supporting text and also in the Glossary to the Local Plan; otherwise, it is unlikely to be effective. We would recommend the Council refer to the South Downs Local Plan (2019) and South Downs Design Guide SPD (2022) for good definitions for landscape-led design.
- Clause e) regarding **low carbon** design and construction is ineffective as it does not specify any requirement relating to Policy EN 3 (Climate Change Mitigation and Adaptation) in the context of Paddock Wood and its allocations. Policy EN 3 would apply to any development regardless of this clause. PWTC would expect this policy to refer to specific design and construction (including energy) expectations in line with Policy EN 3 that would be suitable and supported in Paddock Wood and particular parcels, if necessary.
- **Recreational, green and open space** requirements (clause f) need to be set out in this policy and justified by technical evidence base. This current lack of clarity is

likely to lead to inadequate and poorly designed recreational, green and open spaces which are clearly required to support this strategic development. Map 28 does not even indicate 'schematically' how 'informal and formal recreational needs' and 'areas of green and open space' are provided. This is clearly not justified or effective and the recreational, green and open space requirements.

- Clause g) covers **biodiversity**, and it mainly refers to Policy EN 9 (Biodiversity Net Gain), which states that proposals must demonstrate conformity with the Biodiversity Net Gain Hierarchy. Unfortunately, it fails to adequately set out the Biodiversity Gain Hierarchy, which is distinct from the NPPF 'mitigation hierarchy', as raised in our previous representations. Furthermore, clause g) states that development proposals shall meet the biodiversity objectives of Policy EN9 in an integrated and comprehensive manner, however, it does not explain what an integrated and comprehensive manner would be in the context of the strategic sites in Paddock Wood. In that regard, the policy wording is ambiguous and ineffective.
- **Flood risk** wording (clause h) is unacceptable as proposed. Our previous representations explain in detail the poor policy wording insofar as it does not align with Policy EN 25 (Flood Risk). Furthermore, clause h) refers only to surface water flooding, where the main source of flood risk in the area is from rivers, which is not covered in the policy. Moreover, the wording of the clause should be improved, as it is not currently clear as it suggests that flooding elsewhere shall be improved. The wording should refer to reduce flood risk instead, as improve flooding implies the opposite of the policy aspiration. Therefore, in the absence of clear and unambiguous wording and compliance with Policy EN25, this clause is ineffective.
- Clause k) regarding **walking and cycling** is not an effective policy wording as it is missing reference to all the key infrastructure that will require safe walking and cycling links. This policy wording should also include the railway station, schools, sports, recreation, health and other key local facilities. The policy does not refer to an overall 'walking and cycling strategy' which is required for there to be any hope of a joined-up system of walking and cycling infrastructure that will genuinely encourage and persuade residents to use active travel rather than drive private cars. The policy should refer to the Cycle infrastructure design (LTN 1/20) (Guidance for local authorities on designing high-quality, safe cycle infrastructure) for the required standard of this infrastructure. Whilst the new clause wording refers to Vision and Validate/Monitor and Manage principles, it is not clear what these principles are and where they are defined in the Local Plan. The policy supporting text should explain what is meant by Vision and Validate/Monitor and Manage principles. In that regard, this policy is an unambiguous clause, and the walking and cycling linkages wording is insufficient to ensure the active travel aspirations of the Local Plan, therefore, it is ineffective as currently worded.

**Paragraph 4** relates to **piecemeal development** and effectively provides a clause for allowing 'piecemeal development of individual sites' as long as they conform to the above requirements of the policy'. We consider this is unjustified and consider that the wording

“that do not conform to the above requirements” is deleted from the policy. This will help deter and prevent piecemeal development coming forward, which is a considerable risk for this strategic allocation and has been a key risk identified throughout the hearings. Furthermore, any clause regarding piecemeal development should stress that the piecemeal development or artificial partition of parcels would be refused where they present uncertainty in the delivery of the allocation policy requirements, masterplans and all relevant infrastructure. In the absence of a more robust and efficient policy wording, this clause would not be sound.

**Paragraph 5** states that “planning applications for development should be informed by appropriate landscape and visual impact assessments, biodiversity and heritage studies where necessary.” Unfortunately, it is unclear why the Council has only included the requirement of these studies and not others from this list. There are many more studies that are required for applications, including detailed flood risk studies and flood risk strategies, drainage strategies, transport assessments and transport plans. We would like to see a more comprehensive list provided rather than just three types of studies. Furthermore, “where necessary” should be deleted from the policy wording, as it adds uncertainty on when these studies and assessments would be required and this decision cannot be left to a developer in the future, but should be understood at plan-making stage, or at least, relevant parameters for this requirement should be established in the policy. Should the above not be corrected, this policy paragraph would be inefficient.

PWTC would also like to raise concerns with the addition of a **new paragraph 7** to Policy STR/SS 1 (The Strategy for Paddock Wood including Land at east Capel). Paragraph 7 states: *“All residential development shall be within Flood Zone 1, and planning applications shall be supported with an up to date site specific Flood Risk Assessment in accordance with Policy EN 25.”*

The above paragraph was not included in the pre-submission policy text, and it adds a significant constraint to all allocated sites for residential development (Parcels A, B, C, D and F, approximately 2,450 dwellings) as developable areas would be limited to Flood Zone 1. This would be a substantial constraint for development of Parcels A (North Western) and B (Western), which are allocated for 1,290 dwellings and the majority of the two parcels is within Flood Zones 2 and 3, being Flood Zone 1 a small portion of the two parcels, presenting capacity problems to deliver 1,290 homes as well as potential significant impacts on landscape and views, as development within Flood Zone 1 only would likely lead to higher density.

Furthermore, the above constraint should be considered in light of other development principles, masterplanning and strategic infrastructure requirements, which would also add constraints to the developability of Flood Zone 1.

We are concerned that this modification (MM81) to Policy STR/SS 1 has not been supported with a robust assessment of capacity and viability of the development strategy in consideration of the flood risk specific requirements (i.e. residential development within Flood Zone 1). Therefore, the Council considers it not to be justified and positively prepared, and whilst developing homes within the safest flood risk area is necessary, the implications to the deliverability on these sites has not been sufficiently assessed. Therefore, we consider this paragraph to be unsound.

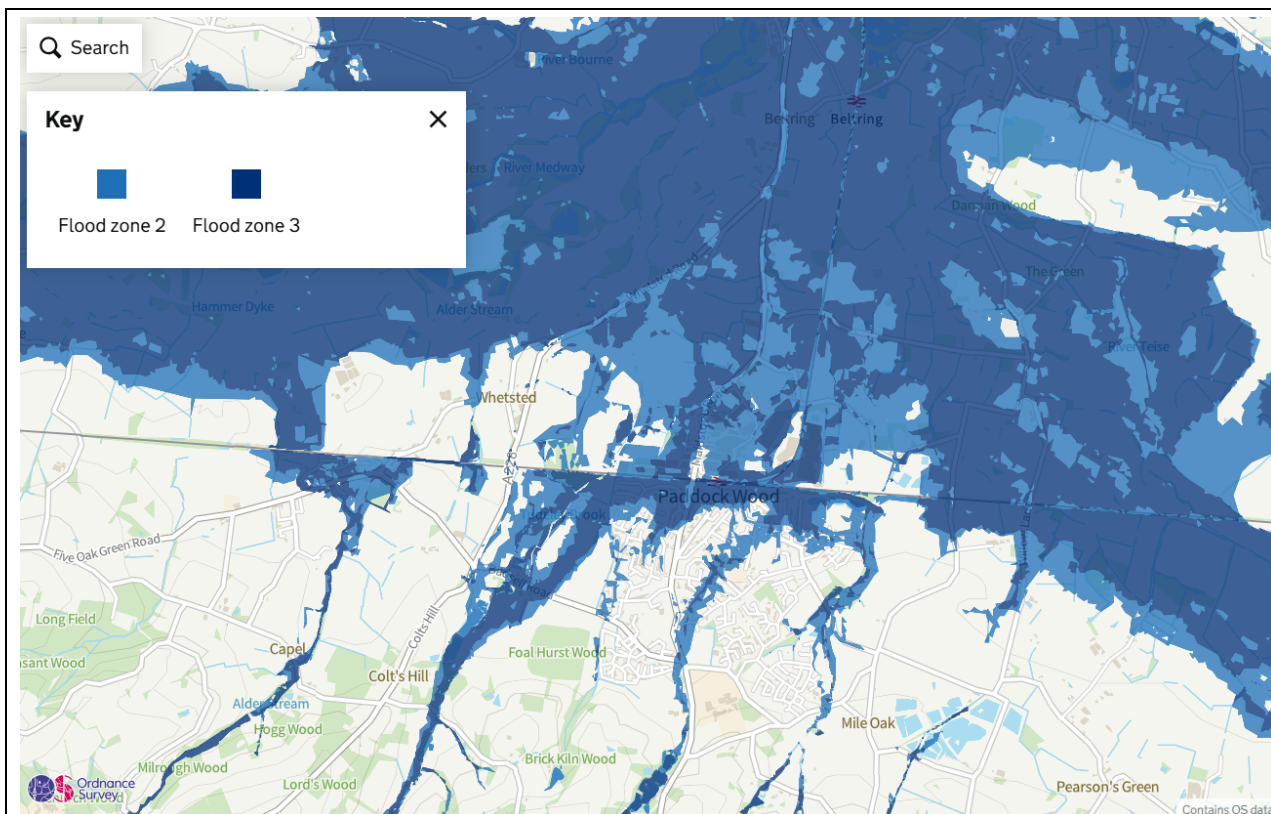


Figure 1: Map of Paddock Wood showing Flood Zones 2 and 3. Source: Environment Agency.

## Masterplanning

We are concerned with the ineffectiveness of the masterplanning section of Policy STR/SS 1. Masterplanning is only required for western and eastern parcels, but these are not individually identified, and we can only assume that these are parcels A, B, C and D. No mention is made to parcels E (Northern) and F (Town Centre), and no justification is provided for not being included in the masterplanning requirement. There is no reason or justification provided in the policy or its supporting text as to why some parcels and not others should have a masterplan.

The responsibility of preparing masterplans has changed from previous Local Plan iterations. The pre-submission Local Plan required a Framework Masterplan Supplementary Planning Document (SPD) (prepared and adopted by the Local Planning Authority), but the Main Modifications version omits this masterplanning leadership by the LPA and expects them to be produced by developers instead. The initially proposed policy wording stated: *“These Framework Masterplans will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood and east Capel. The SPDs will set out guidance to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site. It will provide guidance on design, phasing, and site access to ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood”*. We are concerned that the proposed new wording involves a delegation of the masterplanning process, which is unjustified and would fail to provide an effective policy and design framework for the development in the absence of parameters, a process and more measurable and specific expectations in the Local Plan with regards to masterplans. In the absence of these LPA-led SPDs, who will warrant the

above-mentioned guidance and goals? Who will ensure that PWTC will be actively engaged with in the masterplanning phase?

Furthermore, no reference is made in the policy to masterplans having to be coordinated, spatially and in time, to deliver the development across all parcels in a manner that is supported with sufficient and adequate infrastructure, as well as coherence with other parcels and existing development.

No indication is provided of the process for approving masterplans nor the status of the masterplans once approved. Initially, they were expected to be SPDs, but would they become part of the Development Plan, or would they just be part of a pre-application? Will there be public consultation? It is important that PWTC and other key stakeholders are consulted on these masterplans. If they are simply submitted as part of the pre-application process, then they would not be available for public comment. Furthermore, public consultation should be led by the LPA and not by developers, in the interest of an early, proportionate and effective engagement process, in line with paragraph 16 of the NPPF.

Paragraph 8 states that development proposals shall be in accordance with masterplans that will respect the requirements of paras. 2 to 7. This wording sounds optional and needs to be strengthened to state that proposals must meet the requirements of paras 2 to 7 of the policy. In addition, this should state that proposals must meet the overall requirements of this strategic policy as well as the other policies of the Local Plan as a whole.

We are concerned that the wording of paragraph 8 is weak in securing a cohesive extension to Paddock Wood, as it allows development proposals and masterplans to be prepared for a single parcel or even part of a parcel only, lacking any coordination between developments and parcels. This would jeopardise the spatial, functional and time coherence of the strategic site.

Our previous representations included a series of concerns with regards to paragraph 9's clause a), as '**functional links**' are not defined, and it is not clear whether this would require infrastructure or not. If it does, this needs to be included in the policy to be effective. Clause b) refers to **heritage assets**, but it provides a lower protection to assets in the strategic site than policies EN4 and EN5. The language should be clear on what is expected from the development to 'sympathetically integrate' assets and their setting in the development, as this is not wording used in the NPPF. Furthermore, **structural landscaping and treatments** should be shown on masterplans, but the clause remains ineffective in the absence of an actual requirement for landscaping, such as connecting existing green and blue infrastructure assets, habitats, retaining existing hedgerows, etc. Moreover, clause e) is ineffective in securing **sustainable transport measures** in the absence of reference to a map or specifically identified services and infrastructure that would be required. **Links** in clauses e) and g) should also include the railway station and facilities Paddock Wood. Otherwise, there is no certainty to developers on which sustainable transport links should be master planned.

Paragraph 10 sets out some requirements for the employment allocation (Northern Parcel), but it does not require a masterplan process for it. Considering the substantial flood risk within the Northern Parcel and the mix of uses (approximately 4.25 hectares of Class E (g), B2 and B8 employment uses) lead to a complexity to develop this parcel in a cohesive manner and in line with the strategic site allocation aspirations. Therefore, a



masterplan would be expected, including specifications on the proportion of uses and the necessary infrastructure to support the relevant use mix. A mix of a large proportion of storage and distribution uses would have substantial impacts on the diversity of the employment provision, the necessary infrastructure and the typology and size of plots and buildings. The uncertainty of not having further detail on the mix, parameters and a masterplan leads to the ineffectiveness of this paragraph in securing high-quality design, employment and infrastructure, in line with the Local Plan aspirations.

Finally, paragraph 11 relates to the **phasing and implementation** of masterplans requirements for Eastern and Western Parcels, but the policy fails to set out control mechanisms for the delivery of the Northern and the Town Centre Parcels, or the Strategic Site as a whole.

### **Strategic Infrastructure**

Paragraph 12 relates to securing infrastructure through conditions and Section 106 legal agreements, which shall be capable of being integrated and phased and its impacts satisfactorily and mitigated. Yet, the masterplanning requirements in this policy do not include the whole Strategic Site, only part of it, and masterplans and planning applications can take place at different times and separately from others, with no clear phasing or implementation plan of the whole Strategic Site. Therefore, paragraph 12 is ineffective in integrating and phasing development, as the Local Plan does not set out the parameters for the coordinated implementation of the site and its associated infrastructure. Furthermore, the meaning of 'integrated and phased' and 'impacts satisfactorily and mitigated' is not clear, and these two expressions lead to uncertainties in their interpretation that could imply an ineffective implementation of the policy.

Clause b) of paragraph 12 misses key facilities and infrastructure that would be necessary for the 'early establishment of a self-sufficient and cohesive community', such as sustainable transport (including active travel) infrastructure. The omission of sustainable transport (and the insufficient reference to cycle and pedestrian links in clause c)) as necessary infrastructure for the early establishment and cohesion of the community would not be justified and it is important that it is mentioned specifically as part of the supporting infrastructure provision, in order to be positively prepared (so infrastructure meets local need and is consistent with achieving sustainable development) and it is justified on the Local Plan vision and objectives, as well as being effective and not deferring this to a later stage.

Whilst paragraph 13 states that the delivery of infrastructure shall be informed by ongoing discussions with Paddock Wood Town Council and other stakeholders, we consider the wording to be insufficiently clear on the process. Would the Town Council be involved at master planning stage? Would it be involved at the pre-application stage? If so, how? Being informed by discussions with PWTC is not the same as actively engaging with PWTC. We consider that in order to fulfil the NPPF requirement of effective engagement (paragraph 16 c), this policy requirement should require active engagement with stakeholders and not only relate to the delivery of infrastructure but also to the planning and design of infrastructure as earlier necessary stages for infrastructure delivery. In the absence of the above, paragraph 13 will be ineffective and would fail to ensure that infrastructure (and the plan) is shaped by early, proportionate and effective engagement.

There is a second paragraph 13, which should be paragraph 14 (typo). This paragraph requires development proposals in relation to all Parcels to be supported by planning

obligations for the timely provision and/or contributions for the implementation of highway, education, health and other infrastructure in the Infrastructure Delivery Plan (IDP). However, the wording is not clear, and it does not effectively identify which are the relevant parties that should be involved in the consultation process. Would PWTC be consulted on? This text is ambiguous and should be reworded to be effective.

Paragraph 15 identifies the following infrastructure to be funded:

- a) **Sports and leisure provision**, but it does not identify where in the Strategic Site (or which Parcel) should be located. Furthermore, it states that it 'shall include a 25m swimming pool if feasible'. This is not a robust policy wording and the location of the facilities should be identified (or parameters outlined: e.g. in walking distance from the railway station, not more than 200m away from a bus stop, adjacent to other mix uses...) and the wording of the swimming pool should be stronger: 'which shall include a 25m swimming pool'. In the absence of the above, this policy requirement may be ineffective in securing adequate facilities for the local community based on need, catchment potential and sustainable location and transport.
- b) The '**health provision**' requirement is not sufficiently clear and should identify what the provision should be in terms of type, form, scale, or whether the extension of existing facilities should be explored first. This requirement is ineffective as many facilities could meet the 'health provision' requirements but not be adequate for this development in terms of location, scale or need. Since Paddock Wood has not had any increase in health provision with the recent and current developments, it would be very important that the the strategic infrastructure section of the policy is clearer in terms of the scale of the health provision expected.
- c) Regarding the **secondary school provision**, PWTC is concerned that the approach followed is unsound given the lack of understanding of the deliverability of an expansion of Mascalls Academy at the Local Plan making stage, which should have been assessed. The new secondary school at the North Western Parcel should have also been assessed in terms of viability and deliverability. This issue could lead to the educational facility requirement not being effective when a planning application comes forward as its deliverability and viability have not been sufficiently assessed.
- d) In the absence of a complete and connected active travel infrastructure network, the potential for modal shift would not be maximised. As per our previous comments regarding **cycle and pedestrian links**, the proposed wording is ineffective in facilitating the modal shift on which the Local Plan relies upon. Walking and cycling routes (infrastructure, not just designations) should be required within all parcels, and connecting all parcels, facilities and the railway station (and not simply stop at the site boundary) as well as providing improved and permeable connections across the railway line.

- e) The improvements to the **highway network** clause should state that the improvements i) to iv) are not part of a comprehensive list of highway improvements and that it includes other junction and highway improvements necessary for the Strategic Site. This should be added for its effectiveness and to ensure that the policy secures funding for all necessary highway improvements and not only the four listed schemes.
- f) We also consider that the clause regarding **further improvements to the highway network** is not robust as it leaves the door open to necessary improvements being unimplemented and subject to data that is yet unknown. Further parameters and stronger language should be applied to ensure that this policy clause is effective and provides certainty to developers and residents of the required infrastructure improvements.
- g) This clause refers to **sport provision**, and it is not clear why this is not incorporated in clause a). This split in two clauses is confusing and not clear and should be justified if it is to remain. Furthermore, the location of the new provision should also consider the location of the provision on clause a) and where the need catchment area is so there is no extra provision in some areas and insufficient provision in others. This policy clause is not effective or justified as currently written.

This policy lacks triggers to the delivery of infrastructure and facilities (and sustainable transport services), which cannot be left to a later stage as the Local Plan should confirm that these are, in principle, deliverable and viable.

## **Development Parcel Principle Uses and Development**

### Policy STR/SS 1(A) – North Western Parcel Requirements

We are concerned that the policy wording does not identify the location for the secondary school land and what the policy framework would be for this land should the preferred option of expanding Mascalls Academy go ahead. Alternative development would be allowed according to the latest wording proposed, but surely, whether secondary school or alternative development, this should be known by the masterplanning stage and no later, so the masterplan is prepared in light of the required facilities or alternative uses. Residential and education uses have different infrastructure and space requirements and therefore, the masterplan should be prepared with certainty regarding the secondary school. It also fails to identify how much land should be safeguarded.

### Policy STR/SS 1(B) – South Western parcel Requirements

The housing mix is required to include sheltered accommodation, but this policy does not specify the scale required, therefore in the absence of sufficient parameters and measurable amount of sheltered accommodation (i.e. units), this policy is ineffective in securing an adequate housing provision according to needs.

It is unclear what the flood water attenuation area is for, as the policy does not specify whether it is for surface, river or groundwater attenuation. Clearly, depending on the

source, the area and location required would differ, and it is unclear what the implication to the developable area and design would be in the absence of a more detailed policy.

Furthermore, it requires flood attenuation features, but it does not explain whether it should attenuate all flood risks or just provide a single feature that contributes to flood attenuation. Therefore, this wording is ineffective in securing adequate flood risk attenuation. Should any attenuation feature be compliant with the SuDS and flood risk policies? Furthermore, the policy refers to 'enabling the delivery of flood betterment' which is undetermined and lacks clarity on what it means. Measurable parameters would be required to ensure the policy's effectiveness.

#### Policy STR/SS 1(C) – South Eastern Parcel Requirements

The housing mix requires including specialist extra care accommodation for the elderly in accordance with policy H6, however, neither this policy nor policy H6 sets out specific and measurable parameters for the required specialist extra care accommodation in terms of minimum and maximum size, accommodation units, etc. Without a measurable scale of the extra care facility to be provided, this policy would be ineffective in providing the necessary extra care accommodation, according to needs.

Moreover, should the Mascalls Academy not be expanded in the end (should a new secondary school be delivered instead), there is no scenario for the future of the land initially expected for the expansion of the academy. This should be set out in the policy.

#### Policy STR/SS 1(D) – North Eastern Parcel Requirements

Whilst it requires land for a primary school, it fails to identify the location and size or the relevant measurable parameters for these two. In the absence of these parameters this policy fails to secure quality and capacity for the future primary school and therefore it is not effective.

#### Policy STR/SS 1(E) – Northern Parcel Requirements

This section of the policy does not add anything to the policy that hasn't been covered before, however, it should include parcel's specific requirements such as flood risk mitigation measures, wastewater treatment works upgrades, crossings over the railway line and opportunities for enhance car and cycle parking on the north side of the railway.

5.

**If you do not agree with the proposed Main Modification/document, please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 4 (above) where this relates to legal compliance or soundness.**

**Please be as precise as possible.**

**The text box will automatically expand if necessary.**

## MM81

### Policy STR/SS 1 (The Strategy for Paddock Wood including Land at east Capel)

- Amend 'limits to built development' west of Paddock Wood.
- Provide a clearer definition of 'garden settlement principles in the policy wording. Provide justification for these principles and evidence that demonstrate that they have been incorporated in a viability study of the Strategic Site.
- The housing mix requirement should be clearly written to avoid circularity and be effective in providing the housing size, type and tenure that is in need locally. The mix should prioritise the needs identified in evidence, including in the Paddock Wood Neighbourhood Plan.
- The term 'mixed communities' should be defined. Furthermore, clause c) should clearly state typology, scale and parcel location of the schemes identified in the policy (e.g. extra care housing).
- The term landscape-led should be defined in the supporting text of the policy or the glossary of the Local Plan. Given that this is a process, not a result, in terms of design, the design process should be clearly explained.
- Clause e) should be site-specific and built on the requirements in Policy EN 3, therefore, design and construction requirements in the policy should be specific to Paddock Wood and the opportunities and constraints identified in the Strategic Site, given its size and location. For instance, water is an important issue in this location and thus, the policy should make specific reference to this in terms of construction and design.
- Clause f) should be supported with additional maps (beyond Map 28) showing the broad scale and typology of recreational, green and open spaces expected in the Strategic Site.
- Clause g) needs to be reworded to include the BNG hierarchy (not only mitigation) and define what the expectation is in terms of integrated and comprehensive proposals.
- Clause h) should include other sources of flood risk, not only surface water.
- Clause k) should be worded to include infrastructure instead of links and should include connections to key destinations such as Railway Station and facilities. The policy should include reference to the minimum standards in terms of design and explain in the supporting text the Vision and Validate/Monitor and Manage principles.
- Paragraph 4 should be worded to prevent and not support piecemeal development and support joined-up development in line with masterplans, instead of the current wording.
- Paragraph 5 should include all relevant studies and assessments, and the policy should include a comprehensive list and avoid the term "where necessary" as their need has already been determined by the LPA at Local Plan stage.
- Paragraph 7 should be re-considered in light of the above comments regarding the 'limits to built development'. The implications in terms of the developability of the

site and capacity should be explained in the supporting text and with additional evidence.

### *Masterplanning*

- Masterplanning should be required for all parcels, including parcels E (Northern) and F (Town Centre).
- Masterplanning should be led by the LPA and be done in a single master plan, as an SPD, with consultation with Paddock Wood Town Council. Any masterplan policy wording should require consultation and active engagement with Paddock Wood Town Council and compliance with Paddock Wood Neighbourhood Plan.
- The policy should include a specific process for making masterplans, including public consultation stages.
- Paragraph 8 should be strengthened to ensure compliance with the Strategic Policy.
- Paragraph 8 should not support masterplanning of areas that are smaller than a single parcel.
- 'Functional links' should be defined and, in our view, clause a) of the masterplanning section should require infrastructure, not just links.
- Clause b) should be reworded to ensure alignment with heritage policies.
- 'Structural landscaping and treatments' should be shown on masterplans, and 'Sustainable transport measures' should also be spatially shown in the Strategic Policy's supporting maps to ensure that masterplans comply with these and secure space for any measures.
- Paragraph 10 should be amended to include an employment use mix.
- Paragraph 11 should be amended to include phasing and implementation parameters and specific and measurable targets.

### *Infrastructure Delivery*

- Paragraph 12 should be supported with clear wording and definitions when stating 'integrated and phased' and 'impacts satisfactorily and mitigated'.
- Paragraph 12 should also specifically include sustainable travel infrastructure.
- Active engagement with stakeholders at an early stage (including masterplanning), including PWTC, should be included in the wording of paragraph 13. A list of minimum stakeholders to engage with should be identified in the text.
- The second paragraph 13 should be amended to paragraph 14.
- Regarding paragraph 15, clauses a) and g) should be merged and clearly written. The wording 'if feasible' when referring to the swimming pool should be omitted. Clear location and accessibility parameters should be included in the policy wording.
- The location, scale and typology of health provision facilities should be provided in the text.
- The provision of the new secondary school should be explained in terms of evidence and viability in the policy supporting text.

- Cycling and walking links requirements should be reworded to refer to infrastructure to avoid designation of routes only.
- Clause e) should be reworded to refer all other highway improvements necessary for the Strategic Site, and clause f) should include further parameters and use stronger language.

*North Western Parcel Requirements:*

- The location of the secondary school should be identified as well as alternative uses in case the school does not take place and the existing Mascalls Academy expansion goes ahead. It should also include the amount of land to be used for educational purposes.

*South Western parcel Requirements:*

- The scale of the shelter accommodation should be included.
- The policy text should be clear on what type of flood risk it is referring to and should also set out specific, measurable parameters regarding flood risk management.

*South Eastern Parcel Requirements:*

- The scale and typology of extra care accommodation should be included in the policy text.
- An alternative scenario for the extension of the Mascalls Academy should be included in the policy.

*North Eastern Parcel Requirements:*

- The location and size of land (or parameters) proposed for primary school should be included in the policy text.

*Northern Parcel Requirements:*

- It should include flood risk mitigation, wastewater treatment works upgrades and crossings over the railway, as well as enhance car and cycle parking on the north side of the railway.

6.

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

**The text box will automatically expand if necessary.**

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**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

7.	Please tick this box if you wish to be kept informed about the Inspector's Report and/or adoption of the Local Plan	X
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Signature		Date	30.04.2025
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Thank you for taking the time to complete this form.

**Closing date for responses: midnight on Wednesday 30th April 2025**