

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

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Policy

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 'any other comments'

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 'any other comments'

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

#### Consultation on Council's Response to Inspector's Initial Findings

I do not believe this Response fully meets the Inspector's initial findings with reference to:

1. **The Development Strategy – Policy STR1** ....plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy:.
1. **The Strategy for Paddock Wood and East Capel – Policy STR/SS1** ..Another soundness issue is how the Council will ensure that development comes forward in a comprehensive manner, thus ensuring that the vision for a strategically and holistically planned expansion to the town is realised. As submitted there is insufficient detail on how the parcels will be delivered. The plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives.

1. **In his Conclusions and Next steps...***However, the implications of my initial findings at Tudeley Village could have far greater consequential impacts on other aspects of the plan, from infrastructure provision to whether the Plan is able to identify a sufficient supply of housing land.*

I find little or nothing in the proposals to address the overall shortfall of housing identified by the proposed removal of the Tudeley development and reduction of development in Paddock Wood areas of high flood risk, other than a reference to an early review of the Local Plan. Where and how is that shortfall to be made up given that the Borough Council appear to have ruled out potential alternative sites other than Paddock Wood? Why has TWBC not identified alternative sites elsewhere in the borough now and submitted them in the proposal? The Inspector states that there may be greater consequential impacts of the Tudeley Village findings on other aspects of the plan, I do not consider that these impacts have been fully identified and addressed. Why isn't a full solution clearly stated – surely it has been discussed by Council? The plan, to me, appears incomplete and that key decisions are being pushed back to the “early review” when they should be clearly stated in the plan now. And I consider there is a real possibility there will be more significant development proposed around Paddock Wood at a later stage (but within the current time framework of this Plan).

There appears to be a reluctance of TWBC (who state they have no legal requirement - which I question) to engage further with PWDC and others on what, to me, are significant changes and a lack of clarity on key issues.

I do not believe the time scales for the building of these developments on the identified sites are realistic and they will not meet TWBC housing requirements within the given time constraints. Further, there is a lack of detail with regard to developing key infrastructure in Paddock Wood such as NHS facilities, schooling, sports facilities, town centre development, adequate policing to deal with crime and anti-social behaviour, all of which have already become issues since the recent increase in residential developments being completed without the parallel development of adequate facilities. Nothing in the proposals gives me confidence that this has been sufficiently discussed or planned, and there is little or no mention of, nor apparent cohesion with, the Paddock Wood Neighbourhood Plan, which, in my opinion, addresses some of these issues.

I am concerned that with no revision or update of key documentation such as the Infrastructure Delivery Plan and the Paddock wood Structure Plan, and without considering other potential sites now, rather than pushing decisions back to the “early review” or later detailed planning, the Town Centre will remain severely undeveloped, building of the new proposed urban sites will be fractured, uncoordinated and will lack a cohesive plan and funding for timely utilities and vital infrastructure.

For me, and quite literally closer to home, there is little consideration for the potential of increased flooding risk to existing housing which does not (currently) sit in areas of low flooding risk. My house sits in one of these areas, as do many other residential and commercial properties, and flooding due to excess surface water forcing itself out of road drains onto my property has increased significantly with the most recent developments. This has been evidenced – I have had Borough and County Council representation at my property. The main contributing factor is the lack of investment in drainage infrastructure to provide relief of excess surface water away from Paddock Wood and the surrounding areas. There is nothing in these proposals which gives me confidence this problem is being addressed.

I understand and accept that Paddock Wood should expand and my vision is for it to become a safe and healthy environment with up-to-date infrastructure. A place where people want to come and

live, with opportunities for all, and a vibrant, thriving town centre. But since the recent developments in Paddock Wood started, my perception so far is that there is increased crime and antisocial behaviour, the doctors and dentists are at full capacity, the town centre has seen an increase in provision for retirement homes and social housing and a decrease in any meaningful “town centre” businesses; housing on the new urban estates are difficult to sell with several being sold off to housing associations from distant boroughs; the police station has disappeared, parking is dreadful, the roads are crumbling and the increased traffic on them is a danger to pedestrians and cyclists – even when they are not flooded.

I was hoping that the revised plan would instil me with confidence that these current issues will be resolved and not exacerbated by the increased allocation of urban development – it does not.

To reiterate, in the Inspector's Initial Findings it states that the plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives. I do not believe the plan does this. As a Paddock Wood resident, I would ask TWBC to increase meaningful engagement with PWTC, which in my opinion they are legally obliged to do, take into account the Paddock Wood Neighbourhood Plan, reconsider alternative sites and provide us with more evidence the plan is affordable, can be delivered effectively in a coordinated way, will give us the infrastructure we need and provide us with convincing evidence that the Paddock Wood share of the proposed development is sound and justified.

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

No, I do not wish to participate at the examination hearings