



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

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
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Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_046 PDW strategic sites

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

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 or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

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	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Adrian	
Last Name	Pitts	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Address Line 2	████████████████████	

Address Line 3	██████████	
Address Line 4	Kent	
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	████████████████████	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	ADRIAN PITTS
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3.	To which part of the document listed in Box 1 above does this representation relate to?
Chapter and (if applicable) sub heading	Please see text below
Paragraph number or appendix	Please see text below

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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Strategic sites - Education:

2.21 KCC assessment of need is 3FE expansion of Mascalls, this is below the 6FE required at end of development in the Local Plan. **Why is a longer term plan for education needs not being undertaken by KCC on the development envisaged in the plan. Elsewhere there is a statement that a 9FE school is required at the end of the development planned in the LP. Unsound.**

Strategic sites - Sports:

3.18 sports provision – the emphasis is clearly on accessible centres. **Because of the loss of Tudeley Village, the proposed sports provision in the plan near to Five Oak Green is not accessible so would create additional traffic.** Please see my more detailed response to the IDP document where sports leaders in the town set out their requirements clearly.

Green lane is not extensively used at the moment but with an upgrade could provide sports activities **although it is not as well connected to transport links as other strategic sites as required in 3.18.**

3.19 potential upgrades with fig 11. Sports hub cancellation leaves a sports deficit - particularly football tennis netball and cricket. **This needs to be addressed working with the current sports leaders in the town and the others that currently use Paddock Wood for training eb. Langton Green Sports. There is no submitted evidence that a meeting of officers with the sports stakeholders in Paddock Wood has taken place before the hearing. Without true engagement with sports clubs, venue managers and the goals in the Neighbourhood Plan this is unsound.**

Query: 3.32 table 3 now says 6FE secondary school **yet no feasibility reports have been included in the new evidence.**

6.	<p>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 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this 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.</p> <p>The text box will automatically expand if necessary.</p>
<p>Consultation with stakeholders in Education including the public and potential parents, and Sports requirements should inform the LP and this needs to happen.</p>	

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
<p>The 20 documents provided are technical and are not likely to be engaged with easily by members of the public in Paddock Wood. Face to face consultation hasn't happened except through the work of the Town Council (Sports) and this exercise is not explained in plain English. Consultation needs to ensure an element of actual engagement with the community.</p>	

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>
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No, I do not wish to participate at the examination hearing session	
Yes, I wish to participate at the examination hearing session	x

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
<p>Questions need to be answered and a workable plan for the upgrades and expansion of sport and leisure represented at the public hearing.</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

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Signature	ADRIAN PITTS	Date	21.10.24
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Telephone number	██████████	
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PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	Adrian Pitts
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Chapter and (if applicable) sub heading	Please see text below	
Paragraph number or appendix	Please see text below	

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PS_095 revised policy wording for Policy STRSS 1

Strategy for Paddock Wood (Policy STR/SS 1

Many of the principles of development as stated here are sound goals that need to. Be delivered - including setting a limit to build development - as Policies map (inset Map 4) **approx 2450 dwellings** maximum.

Delivery of the principles are underpinned by infrastructure.

Section 15 a-f states infrastructure **to be included**:

- Sports and leisure provision to **include an upgrade to existing indoor and outdoor sports facilities (incl 25m pool if feasible) There is no record of Pool feasibility in this document or the others in the new evidence base. Has feasibility been done? There is no detailed policy or delivery feasibility in these documents.**
- Health provision (one or more local centres)- **yet there is little outlined in the IDP or elsewhere about how this will be delivered. Land is only part of the picture and the ICB have agreed this in principle, so the details need to be added to the delivery of this policy to be sound planning.**
- Secondary school (3FE) expansion of Mascally Academy OR new school on NW development parcel. **The new school in NW parcel has now been amended to a Plan B if the expansion of Mascalls is not viable, the policy is to persue the expansion of Mascalls on a permanent basis (currently temporary) which means the wording is inaccurate and therefore unsound.**
- Cycle and pedestrian links **This is within the parcels of land, but the wider connectivity is not mentioned as a policy underpinning the delivery of these links.**
- Improvement to highway network including Colts Hill Bypass: **this is clearly included in the infrastructure needed however KCC has updated its support and viability on major road infrastructure as at the JTB meeting TWBC Mon (Briefing from KCC Highways – B2160 Maidstone Road/Mascalls Court Road Paddock Wood Junction Improvements (please see my detailed response in my representation to the IDP document). Without this infrastructure the plan is unsound. The original Fowlhurst Green development Part 1 had KCC sign off on a reworking of the B2160 junction with a ‘queing lane’ from the earliest public consultation which I attended. KCC obviously did not research this in any detail for this and the A228 junction (which cant go ahead at all). Their new solution needs to be represented in the LP and acknowledge that the staggered cross**

roads is an unsound solution to the junction as it will create a bottleneck and congestion, and impede traffic flow further.

- Promised infrastructure from existing development including highways improvements have not been delivered. This policy needs to be amended to account for the lack of highways planned by KCC for Paddock Wood, and the delays to promised infrastructure rectified. Without this the scale of development would need to be reconsidered.
- Planned infrastructure has been cancelled by KCC or a cheaper compromise suggested which is unsound for the final stages of the plan.
- Delivery of 4,54ha of sport provision (south western parcel and NW parcel including outdoor pitches, changing facilities and car parking – the EA have agreed this even though it is subject to flooding. It is not accessible in the NW parcel by public transport or rail links. Car and cycle parking needs to be quantified. The sports clubs in the town have responded to this elsewhere. Not clear if this is still going ahead. Needs clarification.

I note that supporting infrastructure is phased, this phasing needs to be revised given the lack of foresight and planning by KCC:

Short term - 540 homes, C & D site works, Badsell Road/B2160 junction; Hop Farm roundabout and junction 12 roundabout; Cycle storage contribution to PDW station. ***This is affected by KCC's report mentioned above as a modified less effective plan is being proposed for delivery in 2026.***

Medium term - 1650 cumulative total. Colts Hill improvement works, Pembury Road/A264 works; Somerhill roundabout, Parcel D primary school, Parcel A primary school. ***Colts Hill improvement works need to be in place, given the disruption caused when it is closed sending unsuitable traffic through Matfield to the A21.***

Ped/cycle link over railway A & B parcels subject to National Rail. **So this hasn't been agreed with National Rail or it's nationalised state replacement so is not guaranteed in this document. Unsound.**

Putlands improvement indoor; Green Lane improvements; Land on A/B for 4,54ha sports and leisure. Parcel D allotments created. **Please see my earlier comments on this and the conflict with the views of local sports leaders.**

Long term - 2450 homes Shuttle to signal bridge PDW from PW High Street A228 junction 13 works ***if required*** ; ***The plan should have a viability plan for this junction and road infrastructure in order to justify further development to be sound.***

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7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>
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No, I do not wish to participate at the examination hearing session	
Yes, I wish to participate at the examination hearing session	x

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
<p>My questions need to be answered before further housing development can take place. KCC will be at the hearing (?) and they need to justify their predictions and decisions that affect the viability of the LP.</p>	

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Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_096 Education Atkins Realis Mascalls Academy feasibility study June 2024 - PEER REVIEW
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The report highlights significant issues which are not addressed in accompanying policy or delivery documents. This needs to be addressed to be sound. As the report says –

Any proposals for [sport on] the school site (Mascalls) should be considered in context with the wider Paddock Wood sporting strategy. Access to the facilities, including pedestrian and parking requirements need to be carefully designed in order to allow appropriate access which does not compromise the school and how it operates and provides the curriculum.

There has been significant back tracking from KCC regarding handling the increase of pupil numbers at Mascalls and the main route from the Station includes the delayed and scaled down junction with Badsell Road (staggered crossroads). Access by sports club has also been questioned at a recent meeting of sports leaders and PWTC. There are also safeguarding issues if members of the public are accessing facilities when school children are also on the premises. There is nothing about this in any other documents taking this recommendation forward which is concerning.

Sports Leaders in Paddock Wood, and my own experience of trying to hire facilities at the Academy find it very expensive and not easy to get convenient access. Please see my representation on the IDP for more detail.

It recommends - Sports provision strategy review including wider development with consultation with Sport England. **Has this taken place? There is no documentation to support this. This is a speculative point at this stage of the process.**

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<div style="border: 1px solid black; height: 250px; width: 100%;"></div>	

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
<p>Residents do not always have the expertise to provide a reasoned response to issues raised. The original local plan promised ‘betterment’ for Paddock Wood. This has yet to materialise and from what I/we can glean from the documents there is little detail on how things are likely to improve with, to date, no infrastructure improvements having been delivered as a result of the three developments already in situ despite promises which remain unfulfilled.</p> <p>I question the absence of any plain English version of the documents published as part of the consultation which would help the ‘man in the street’ understand what is at stake. There have been no face to face meetings held in Paddock Wood to enable residents to discuss the updated documents with planning officials and there are certainly no ‘easy read’ versions of the documents which would have helped more people understand what it being proposed.</p>	

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	No, I do not wish to participate at the examination hearing session	
	Yes, I wish to participate at the examination hearing session	X

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:	
	My other representations cover this more effectively. The Inspector needs to be assured that this option is viable for all stakeholders.	

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This document appears to set out the joint work programme between TWBC and KCC. It is to me unsound on account of its inaccuracies which need to be corrected.

Although dated August 2024, after the hearings earlier in the year, in Section 3 Educational needs - KCC forecasts a deficit in secondary places.

3b mentions a temporary expansion of Mascalls already taking place, and permanent expansion already 'being considered'. **The other evidence documents show that the expansion permanently has already been agreed.** Indeed, the Persimmon planning application has land for the expansion of 3.84ha.

3f. States that there is sufficient land on existing school site for development of 1,160 dwellings - Academy reverting to 8FE PAN. *Leigh Academies Trust (LAT) who run the school have confirmed that they intend to change the school's PAN back to 240 (8FE) and foresee this being the baseline position when the effects of the PWeC development comes on stream in the academic year 26/27. This change to fewer pupils in their PAN would seem to contradict the 3b and 3f statements. The additional parcel of land is not required in 3f but has been included in 3b. This is confusing to residents.*

3g table shows pupil numbers from age 12-16 years – **why has this statement of common ground not considered Sixth Form numbers as Mascalls Academy has a Sixth Form? Are these numbers included in the PAN calculation and various reports for buildings and curriculum design? It is not clear from this section of the statement. This information needs more detail to predict pupil numbers accurately.**

3h is flawed as it assumes all 521 pupils from the 3 sites would seek a place at non-selective school. 3i and j estimate 35% would be seeking selective places. This doesn't reflect the historical position in PDW where access to selective education is and has always been restricted - Kent wide data is misleading because of the school types in West Kent. Eg. the level of selective education provision in Tunbridge Wells borough being even higher at 4,798 pupils out of a total of 10,363 i.e. 46.29% . Some PDW pupil access TMBC and Maidstone selective schools but have restrictive oversubscription criteria. This aspect of the statement could make the predictions and data unsound.

Footnote 4 page 10 – ***This would in reality suggest that only a 2FE secondary is required to serve the proposed PWeC developments in the short term.***

3l forecast is flawed to assume all 521 children will go to Mascalls and is therefore unsound.

3m. The longer-term cumulative demand for places at Mascalls Academy is very likely to be a significantly lower figure than 1,971 which further supports the next point 3n **3FE would anticipate demand from the future developments.**

NB DFE (Gov.uk gives capacity as 1450 currently with current level at 1320) (source OfSTED) so 130 places not filled.

In Year 7 Mascalls Academy 2023 was 100% oversubscribed (source KCC Admissions data) but DFE data also highlights Leigh Academies Trust as having a higher-than-average leavers rate (35.1%)

The big trusts with higher than expected pupils leaving

Trust name	Predicted leaver rate	Actual leaver rate	Difference (%)
The Ted Wragg Multi Academy Trust*	4.8%	6.9%	+44.3%
Star Academies	3.9%	5.5%	+41.8%
The David Ross Education Trust	5.3%	7.6%	+41.5%
Greenshaw Learning Trust	4.9%	6.8%	+38.3%
The Kemnal Academies Trust	5.3%	7.3%	+37.5%
Leigh Academies Trust	4.4%	5.9%	+35.1%
Unity Schools Partnership	4.1%	5.4%	+31.1%
Harris Federation	4.4%	5.7%	+30.9%

Source: Education Datalab analysis of pupil roll numbers between 2022 and 2023
* The figures include data for two schools that joined later in the 2023 year

**SCHOOLS
WEEK**

3o. Suggests an increase in the capacity for 11-16 pupils from 1,200 to 1,650 based on the expected 2026 PAN and 1,350 based on the current PAN of 240. The sixthform capacity is also anticipated to increase from 250 to 330 places: thereby a total capacity of 1,980 places. **This data conflicts with DFE data quoted above, and Sixth Form places have not been specified in earlier points in this document and there is no data to back up this anticipated growth in this point. Is this based on numbers currently? Can they be shared with the public?**

Section 4:

p14 footnote *KCC plans for all of the anticipated pupils in the plan through places in the comprehensive system as they will always seek to ensure there is a place for every child – **This approach takes no account of pupils' needs which as assumed to be met by non-selective growth in Paddock Wood.***

4.5 suggests further that the only options considered were comprehensives - no account taken of parent choice of schooling including educational standards, needs or curriculum quality. As I have said before at the hearings earlier in the year, this improvises the choice of schools for residents of Paddock Wood. The Tonbridge Schools are dismissed for additional capacity.

4.8 At the hearings earlier in the year we heard from a consultee that Leigh Academies Trust has been talking to Cranbrook schools about a potential Mascalls satellite. **Has any action to find out about this been taken, this has not been so far? If LAT are interested in this satellite it would further reduce the demand for places in Paddock Wood.** At a recent TWBC Planning committee it was reported that further 'child yield' to Mascalls Academy was supported by KCC and was assumed for children from new Benenden Hospital redevelopment. **Has this been factored into KCC capacity calculations? It is not clear in this document.**

Section 5

This gives evidence for the scope to expand Mascalls - to accommodate a total of 1,980 pupils (1,650 i.e. 11FE 11–16-year-olds, and 330 sixth form places). This is to be achieved by a combination of demolition and rebuild and re purposing of existing buildings. **This is confusing to the public as it seems to contradict Footnote 4 already mentioned where the pupils can be accommodated on the present site? This needs to be clear to be sound.**

There seems to be no assessment of the additional traffic, cycling and walking from Paddock Wood Station created by students coming from out of area. Indeed the junction crossroads will cause further congestion and problems as KCC are not able to develop the junction as was agreed when existing development was given consent.

5.4 Although the needs of soft outdoor PE is slightly less than specified in the BB103 requirements it contains both existing and new all-weather facilities that effectively double the areas usability, both for the school and outside organisations outside of school hours, making them more effective than general grass pitches. **This reasoning would convert grass to artificial pitch which would need drainage works. It would be less friendly to the eco system and the case for use by outside organisations is only sound if this is in additional to the stated sports upgrades at sites around the town and not a replacement of the promised upgrades to strategic sports sites in other documents.**

The School are happy that this would "meet their needs and help compliment that on offer in Paddock Wood, thus helping to create a bespoke sports offer in the town". **This is key, to compliment not replace the upgrade of other sites.**

Section 7 joint working

It is good to note that parties are committed to constructive joint working to bring forward and deliver the proposed 3FE expansion to Mascalls Academy.

To this end, the parties are committed to stakeholder liaison in respect of the proposed 3FE expansion to Mascalls Academy, including engaging with Parish Councils, associated Neighbourhood Plan groups and other local groups. **This has not taken place to date. Mascalls were invited to the meeting with PWTC and sports leaders but did not reply. There is not a good working relationship established with the town as reported at PWTC meeting in October 2024 with sports leaders and PDW Borough Councillors. This MOU needs to outline when and how this liaison will take place to be sound.** No where does it mention asking parents in PDW about their views on this expansion or the new school option?

To be effective public consultation, it should be clear who are the other local groups mentioned in 7.1 page 24

This document is signed by CEO, KCC and developers without any wider consultation. People I have spoken to have found the new evidence documents complex and technical which means the plain English of what is proposed is not clear. **There should be a public meeting at the very least on these matters to maximise public buy-in for the LP.**

6.	<p>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 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this 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.</p> <p>The text box will automatically expand if necessary.</p>
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As stated above.

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
	<p>Many residents do not have the expertise to provide a reasoned response to these issues and others such as flood mitigation and traffic management. The original local plan promised 'betterment' for Paddock Wood. This has yet to materialise and from what I can glean from the documents there is little detail on how things are likely to improve with, to date, no infrastructure improvements having been delivered as a result of the three developments already in situ despite promises which remain unfulfilled.</p> <p>I question the absence of any plain English version of the documents published as part of the consultation which would help the 'man in the street' understand what is at stake. There have been no face-to-face meetings held in Paddock Wood to enable residents to discuss the updated documents with planning officials and there are certainly no 'easy read' versions of the documents which would have helped more people understand what it being proposed.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>	
	No , I do not wish to participate at the examination hearing session	<input type="checkbox"/>
	Yes , I wish to participate at the examination hearing session	<input checked="" type="checkbox"/>

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
	<p>To gain answers to my queries which are not in the documents provided.</p>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature	ADRIAN PITTS	Date	21.10.24
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**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
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Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_102-Junction Hotspot Comparison June 2024
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Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

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 or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

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	Adrian	
Last Name	Pitts	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Address Line 2	████████████████	

Address Line 3	██████████	
Address Line 4	Kent	
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	████████████████████	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	ADRIAN PITTS
----------------------	--------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Please see text below	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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There's no information as to when were the tests done date and time?

The original queuing lane proposed for the Foal Hurst development as mitigation now deemed not a workable solution by KCC. How reliable are these new proposals given the issues now from KCC unable to progress two major junctions in the LP. Please see my other documents.

6.	<p>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 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this 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.</p> <p>The text box will automatically expand if necessary.</p>
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7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
	<p>These documents are complex and technical. As an instrument of public consultation, they are beyond some people with the pages of jargon and charts. There is not a plain English explanation of what is proposed, even as a summary so the documentation will be impenetrable for many and not good for public engagement.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>	
	<p>No, I do not wish to participate at the examination hearing session</p>	<p>X</p>
	<p>Yes, I wish to participate at the examination hearing session</p>	

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>	
	<p>I have requested this in other documents.</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

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Signature	ADRIAN PITTS	Date	21.10.24
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**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
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Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_103 Strategic Transport Assessment April 2024

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

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/>

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	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Adrian	
Last Name	Pitts	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Address Line 2	████████████████████	

Address Line 3	██████████	
Address Line 4	Kent	
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	████████████████████	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	ADRIAN PITTS
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3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Reference in text below	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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PS_103 Strategic Transport Assessment April 2024

SWECO consultancy paper

3.2 page 13 Acknowledges that there is a limited increase along the A228 which can be attributed to capacity constraints along this corridor, in particular at Badsell Roundabout. Capacity constraints along A228 contributing to large volume of vehicles routing via B2160.

The document proposes mitigation in line with NPPF for significant impacts at two points -

- 12 Hop Farm roundabout
- 13 A228/B2160 Badsell Roundabout

Junction 13 improvement is not able to be a mitigation for this as KCC have stated that ‘It is not possible to progress any meaningful improvement with this roundabout...within the available highway land.’

“No further work is being done to progress this.” (source TWBC JTB 14.10.24 agenda) <https://democracy.tunbridgewells.gov.uk/mgCon-vert2PDF.aspx?ID=74045>

Junction 12 improvements are referred to in other documents, as being someway in the delivery of infrastructure and not in the short term.

These junctions cannot now be mitigated effectively so this aspect of the plan is unsound. They cannot be assumed to be taking place to mitigate other traffic problems and make assumptions about other resultant road use.

Modal shift – this assessment considers orbital bus service, Network wide Bus service upgrade and Local cycling and walking infrastructure plan (LCWIP).

*- the reduction in vehicles is estimated, based on a high level of modal shift. (4.1) and 4.3 impact assessment assumes traffic interventions on traffic flows this is only a model. **It outlines assumed decreases on key routes PDW connecting with TW, Pembury and Tonbridge. This will be the focus of impact mitigation measures which as I have said are not as set out in the documents. Unsound***

Private companies provide the Bus service, and we already have residents complaining about reduced services over which we have little control -to the Hospital, particularly on Sundays.

P19 - It is considered in this document that capacity improvements on the A228 Pembury Road corridor, including the dumbbell roundabouts, will have the potential to divert traffic away from the B2160 Maidstone Road corridor and thus mitigate the Local Plan impact at Kipping's Cross Roundabout (Junction 35) and the Matfield Crossroads (Junction 107). The B2160 junction will now still be a staggered crossroads and traffic flow will not be as outlined. KCC are yet to design this junction. Capacity improvements are assumed and no new modelling has been presented to allow for KCC's decisions. This is guesswork. Unsound

5.2.2 capacity review:

A228

The data analysis shows that there is a significant capacity issue on the A228 link through Colts Hill, south of the Badsell Roundabout junction with the B2017. As part of the Local Plan Highways Mitigation scenario the model was updated with a higher capacity link that replicates building a new road to modern standards with wider lanes and pavements provided. **This is not now being taken forward (see links earlier) by KCC therefore this capacity review is no longer sound.**

The analysis in the table for 'New Road' shows that this new link will alleviate the V/C issues along this link. Stantec have designed up the Colts Hill Bypass link for the area that links into an expanded Badsell Roundabout. **This is not now being taken forward (see links earlier) by KCC therefore this capacity review is no longer sound.**

5.6 Junction 13 Badsell Roundabout

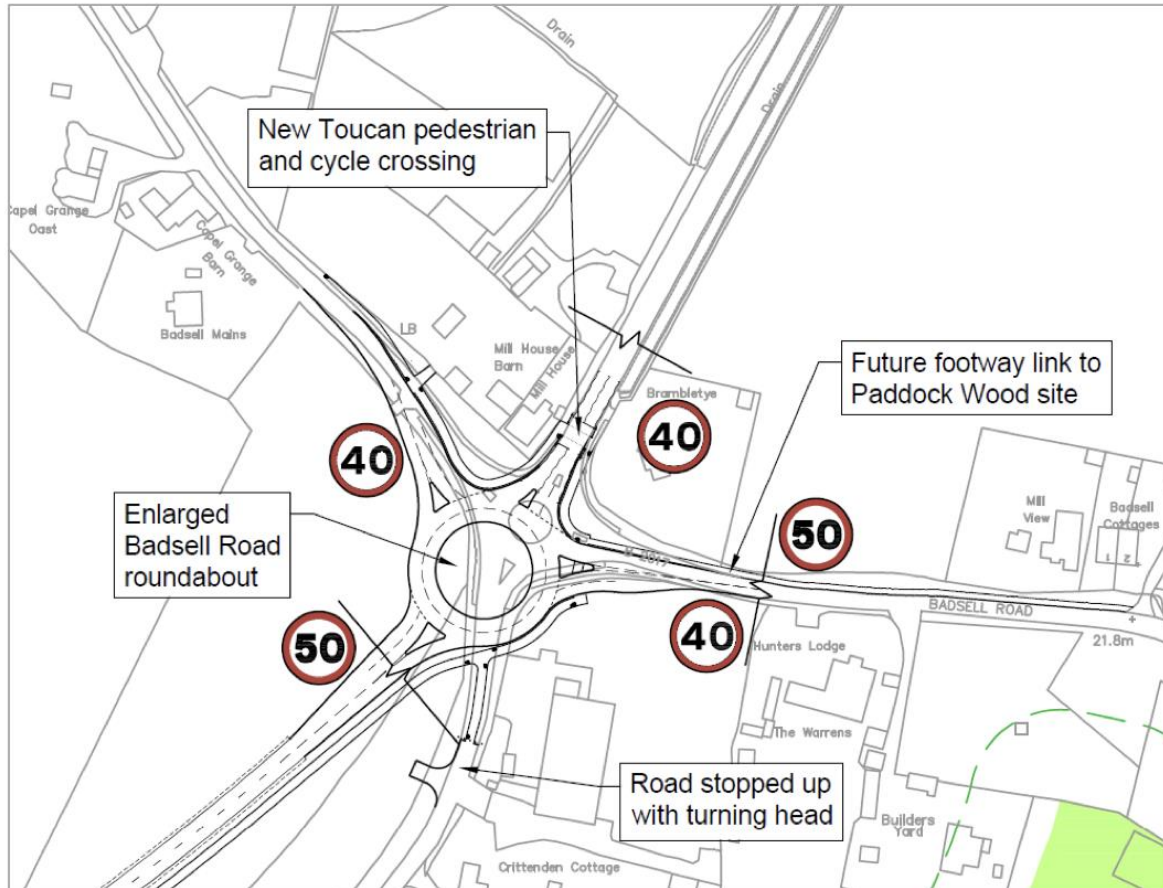
5.6.1 This is crucial to the soundness of the LP – **“When Local Plan demand is added, without changing the junction or link layout along the A228 corridor, it can be seen that the junction fails to function properly, with significant congestion experienced on all arms in both the AM and PM Peaks. This highlights the need for additional capacity at the junction.”** No longer sound.

The changes suggested by the Stantec/Sweco modelling are :

- Increase the size of the roundabout with two lane approaches on all arms as well as two lanes around the roundabout.
- Additional capacity on the A228 south of the roundabout around Colts Hill to take account of the proposed Colts Hill bypass being designed by Stantec.

Note – How does the Stantec developer scheme sit with the KCC update mentioned above that nothing can proceed. Unclear if this is sound or not.

Figure 15: Junction 13 A228 / B2017 Mitigation Concept Design



5.10 Mitigation Option 1

The above demonstrates a notable increase in traffic on the A228 corridor. This can be attributed to the Badsell Roundabout and Colts Hill Bypass Schemes.

Note - assumes improvements further along the road - Matfield Crossroads (107) is not seen as major resulting from Colts Hill Bypass and Badsell Road improvements which are now being delayed if not abandoned by KCC. False assumption. Unsound

5.11 Mitigation Option 2

The above demonstrates a notable increase in traffic on the A228 corridor. This can be attributed to the Badsell Roundabout and Colts Hill bypass scheme. The increase continues to the south of corridor on Pembury Road which is also associated with the increase in capacity at the junctions on this corridor. The combination of these interventions leads to a greater increase in traffic along this corridor in comparison to the LPHM1 scenario. There are corresponding decreases on the alternative routes via Kipping's Cross and Pembury.

Note - again assumes less traffic flow on account of Colts Hill and Badsell improvements that are not proceeding. Unsound

Junction 13: A228 / Maidstone Road – this junction is located on the Pembury Road corridor to the north of the junctions where capacity has been added in the LPHM2 scenario and to the south of Colts Hill Bypass and Badsell Roundabout.

Note - again assumes less traffic flow on account of Colts Hill and Badsell improvements that are not proceeding. Unsound

Table 25 Mitigation Junction V/C Results by Year AM

Junction 12 Hop Farm roundabout – 100% capacity by **2028** B2160 Maidstone Road into Paddock Wood

Junction 13 Badsell Roundabout 105% by 2024 on A228 North and 100% by 2026 on B2017 East. **Note - Colts Hill and Badsell improvements that are not proceeding. Unsound**

Table 26 Results by Year PM

Junction 12 A228 Whetsted Road SW is already at capacity since 2018.

Junction 13 Badsell roundabout - reaches capacity A228 Maidstone Road South 2029, B2017 Badsell Road NW 2029 **Note - again assumes less traffic flow on account of Colts Hill and Badsell improvements that are not proceeding. Unsound**

6.2 Conclusions

'High levels of modal shift' assumed! Focus on walking and cycling from Government. No outline of how this has been assessed or linked to a delivery model.

This document concludes that additional local highways improvements are required and should be considered:

- **Colts Hill bypass and associated junction improvements at Badsell Roundabout (Junction 13) Not going ahead currently so unsound until it is put in place for the expected numbers of dwellings.**

Improvements on this corridor would also result in a diversion of traffic away from the B2160 Maidstone Road. This has the potential to mitigate the Local Plan impact at Matfield Crossroads (Junction 107) and Kipping's Cross Roundabout (Junction 35) **Unsound judgement now the improvements are delayed or cancelled by KCC.**

PS_104 Strategic Transport Addendum June 2024

Section 1 Introduction - TWBC asked for further traffic modelling for the Local Plan to address inspectors comments EiP. As set out in above.

Revised LPHM2 models – include now doubtful improvements (IN BOLD)

- Sustainable Transport Interventions (see Chapter 4 of STA)
- **Colts Hill Bypass**
- **Badsell Roundabout Improvements**

Reduced number of hotspots - 5 majors from 8

Junction 14 A228 Alders Road. **No detailed interventions**

Note - assumes Colts Hill and Badsell have been improved in model to take Badsell and Hop Farm out of major classification.

Note - Issue details - Tunbridge Wells Borough Council's response to Kent County Council's public consultation on its Local Transport Plan 5 (LTP5) - Tunbridge Wells Borough Council - <https://democracy.tunbridge-wells.gov.uk/mglIssueHistoryHome.aspx?IssueId=50035433&OptionNum=0>

LTP5 SECTION 4: 4. Kippings Cross and A228 corridor between Paddock Wood and Tunbridge Wells has Tunbridge Wells Council support.

Junction 35 Kippings Cross and 107 Matfield fall out of major category. **The remaining 2 junctions falling out of the 'major' hotspot list are resultant of the combined effect of the Colts Hill Bypass, Badsell Roundabout, and Pembury Road corridor improvements which divert traffic away from B2160 Maidstone Road**

Section 4 - Badsell Roundabout/Colts Hill Delivery

Schemes are needed by 2029. This was a high-level assessment which considered when Badsell Roundabout is forecast to become over capacity in both peaks due to a combination of Reference Case and Local Plan development. The analysis was based on the capacity at Badsell Roundabout as this is the main capacity constraint within the area and the two schemes are intrinsically linked. Based on Volume over capacity linked to build out rates and RC LPMS scenarios.

This is now unsound given KCC's latest report to the TWBC JTB. Unsound.

6.	<p>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 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this 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.</p> <p>The text box will automatically expand if necessary.</p>
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As above	
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7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
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	<p>The technical and complex nature of these new evidence documents are off putting for public consultation and are difficult to see as aiding engagement with the Local Plan. No meetings have been held to put these documents into plain English and simpler impacts for residents. I would expect less engagement with this stage of the process than before on account of the charts, jargon and abbreviations which are specialist and not easy to understand.</p>
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8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>
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No, I do not wish to participate at the examination hearing session	
Yes, I wish to participate at the examination hearing session	X

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
<p>The 14 October JTB report for KCC is not widely known about. It needs to be addressed at the hearing.</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

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Signature	ADRIAN PITTS	Date	21.10.24
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**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
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**Please use a separate sheet for each
representation**

Ref: (For official use only)
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Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_105 Final infrastructure delivery plan August 2024

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

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	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Adrian	
Last Name	Pitts	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Address Line 2	████████████████████	

Address Line 3	██████████	
Address Line 4	Kent	
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	████████████████████	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	ADRIAN PITTS
----------------------	--------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Please see text following	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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Final infrastructure delivery:

3.20 Junction improvements at B2017 Badsell Road/B2160/Mascalls Court Road and at the B2017/A228 Colts Hill roundabout near Paddock Wood, are secured through S106 agreements as part of the approved residential developments at Church Farm, Mascalls Farm and Mascalls Court Farm. The scheme for the B2017/A228 Colts Hill roundabout has since changed and therefore, the secured funds will be utilised as part of the revised roundabout design leading to the Colts Hill bypass. **This is unsound as KCC have said (source JTB Meeting October 2024) that the A228 improvements are not deliverable and B2107 are being redesigned despite being agreed by KCC before the development of Fowlhurst Green Part 1. The public consultation with Berkeley Homes was therefore not honest as we were told the queuing lane was green lit by KCC. Infrastructure from this has not been delivered to date.**

*Note - p139 Described as **critical** and moderate risk, with £11 million developer funding allocated. **Unsound - KCC have informed the Council (ref JTB October meeting) that this is not able to proceed. Without this critical infrastructure the developments described in the plan are not feasible. The moderate risk is an understatement, and the Council Planners were informed of this in October 2023 (JTB) and possibly earlier. More S106 money needs to be allocated to make this sound.***

P140 Described as critical and low to moderate risk with £1.1million allocated is also not taking place despite being critical and low to moderate risk. Unsound basis for future development.

3.21 future requirements - Colts Hill bypass/Badsell road. Hop Farm Roundabout improvements B2160 / A228. Improved A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout. Widening at junction of B2016 Maidstone Road and Lucks Lane. Can the officers assure residents that these requirements can be delivered after the information from KCC? (source Date: 14 October 2024 Subject: B2160 Maidstone Road/Mascalls Court Road Paddock Wood Junction Improvements JTB TWBC) No roads will mean the scope of development in the LP needs further reduction.

3.63 highlights the additional requirements for PDW Direct and rapid bus routes between Paddock Wood, Tonbridge & Royal Tunbridge Wells and other key locations such as Tunbridge Wells Hospital. Paddock Residents are often unable to get to MTW Tunbridge Wells by public transport. There are currently 3 buses on the 6 route timed to coincide

with school traffic which means the last bus from the hospital is 3.45pm. This section has no planned provision yet. There is no timeline for this, and no business plan. KCC contract management of a service will be needed but it is not detailed sufficiently in this document to be sound.

Education 3.97 ‘Essential’ Three FE provision for Paddock Wood as a result of growth at Paddock Wood and East Capel is again mentioned as infrastructure needed. This would be provided through the expansion of Mascalls Academy by 3FE or if feasibility work concludes this option isn’t feasible, a new secondary school within the North-Western development parcel (to be constructed as a 4FE secondary school that has land available to expand to 6FE) should it be required in the future. **This contradicts the other education documents, as Mascalls expansion is to a maximum of 3FE. If a 6FE school is needed towards the end of the development in the LP a sound proposal would be to allow for this growth in the way it is delivered. Details of the need is missing from the new evidence, as is planning for: Potential for additional places to be provided in West Kent Selective towards the end of the plan period, should there be a required need.**

Health - ICB

Paddock Wood/Capel//Five Oak Green

- “It is considered that a new medical centre is required at Paddock Wood to serve the new population and provision for this has been included in Strategic Policy STR/SS 1 – The Strategy for Paddock Wood, including land at east Capel.”
- ‘Within this area, it is also important to recognise that its not just about considering the infrastructure impacts from a building perspective but the wider issue of workforce and longer-term sustainability and resilience of general practices”

There is no detail on delivery of this essential infrastructure despite c£5m indicative costs and long-term strategy (the PS_105 is a delivery document). Therefore, I judge this to be unsound planning.

Water - 3.132 The development in east and central Paddock Wood can be supported from the existing network. **This is clearly not the case given the impact on the town with recent heavy rain fall.**

3.141 Southern Water is currently on site installing a new pipeline to serve the new housing development at Church Farm, Mascalls Farm and Mascalls Court Farm.

Completion of the scheme, along with a new pumping station is to be confirmed. This is concerning the new pipeline for capacity with existing development not new LP development as this is retrospective. To make this sound the completion of the pipeline and the new pumping station should be outlined in a timeline and an update given at the hearing.

3.146 Paddock Wood and East Capel - **Southern Water note that treatment capacity is currently limited at Paddock Wood and the levels of development proposed exceed the current catchment forecast.** The level of growth outlined at this stage for Paddock Wood, will more than double the size of the catchment,

triggering the need for investment in network and treatment capacity solutions. **This is a delivery red flag for residents. The LP needs to ensure that the investment in network and solutions is planned for in a timely way and not retrospectively added on like the first phase.**

The borough Council is currently engaging with Southern Water to provide a solution. Southern Water has attended the Strategic Sites Working Group and has liaised with the Council and is able to respond within its AMO as required to address the growth requirements in this area. Land has been safeguarded for an extension to the existing sewage treatment works in Paddock Wood. **There should be an updated position given for Paddock Wood residents. Where is the land that has been safeguarded for treatment works? Is this the east site by the chalk stream? The document should outline the agreed AMO and outline the growth requirement clearly for the public to be reassured. Unsound.**

- There will be a need for investment in the Paddock Wood WWTW to deliver increased capacity for the proposed housing growth. Therefore, new development would need to be coordinated with the provision of additional capacity and Southern Water will need clarification on the potential phasing of new development to ensure that this issue is addressed early in the process and to ensure that this investment is delivered alongside the housing growth. **This is very vague, and not really a delivery plan of a crucial infrastructure measure for the LP. Where is the phasing for this, we have it for other things. This is not sound.**

As noted above, Southern Water has been engaging with TWBC through the Strategic Sites Working Group and regular liaison and so are kept informed on delivery programmes. **Does the SSWG report things? How are the public informed? The delivery should be in the public domain.**

Open space, sport and recreation p143 onwards

The delivery of allotments, children's play areas expansion of the current athletics track, Putlands and upgrades to Green Lane are welcome. **However, sports pitches have been given an indicative cost of £4.8m but with no allocated funding? No priority or strategic goals for supporting the Paddock Wood Neighbourhood plan as a project despite this being an important element in the consideration of planning. If the LP overlaps with the PWNP to would be good to highlight this. There should be at least indicative costs to all the items in a delivery document. Unsound.**

Summary p105

3.242 Table 14 supports the growth envisage:

Paddock Wood and East Capel

- If an outdoor sports hub is not progressed, a priority pitch for improvement (drainage issues) is Elm Tree playing fields, as well as possible additional pitches (one adult, two

junior and two mini soccer pitches) and ancillary facilities (changing rooms); also improvements required at Green Lane recreation ground. **Note - does this relate to the £4.8 million indicative cost with no funding position outlined? This could be clearer.**

- Support for PW Juniors as a club - **no funding allocated – how will this be delivered or is it only an aspiration ?**
- Memorial recreation ground protected for football. **Note - does this relate to the £4.8 million indicative cost with no funding position outlined?**

6.	<p>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 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this 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.</p> <p>The text box will automatically expand if necessary.</p>
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As outlined above.

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
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	<p>Residents targeted in this consultation often do not have the expertise to provide a reasoned response to issues in this plan, and others such as flood mitigation and traffic management. The original local plan promised ‘betterment’ for Paddock Wood. This has yet to materialise and from what I can glean from the documents there is little detail on how things are likely to improve with, to date, no infrastructure improvements having been delivered as a result of the three developments already in situ despite promises which remain unfulfilled.</p> <p>I question the absence of any plain English version of the documents published as part of the consultation which would help the ‘man in the street’ understand what is at stake. There have been no face-to-face meetings held in Paddock Wood to enable residents to discuss the updated documents with planning officials and there are certainly no ‘easy read’ versions of the documents which would have helped more people understand what it being proposed.</p>
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8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)	
	No , I do not wish to participate at the examination hearing session	<input type="checkbox"/>
	Yes , I wish to participate at the examination hearing session	<input checked="" type="checkbox"/>

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:	
	<p>Too many unanswered questions about the actual delivery of the LP not addressed in the documents provided.</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature	ADRIAN PITTS	Date	21.10.24
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