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To: [Local Plan \(TWBC\)](#)
Subject: TWBC Local Plan - West Paddock Wood / East Capel
Date: 26 February 2024 17:44:08
Attachments: [flood-map-planning-2024-02-09T21_03_48.199Z.pdf](#)

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The local plan had largely ignored the Paddock Wood Neighbourhood Plan that was only 'made' in September 2023 and due to the reduction in time period to ten years means that the scale and pace of development of new homes will be at such a level the community of Paddock Wood won't be able adapt to it; let alone adopt them even with the required infrastructure improvements to double the size of the town given the three large developments already underway.

For both the Local and Neighbourhood Plans to be successful they should be about creating and supporting a community with homes and infrastructure that have a balanced, vibrant, economically sustainable town; whereas I get the feeling from reading the local plan it as turned into a document that is purely about how can we build enough dwellings to meet a national government target and ignoring the social implications that go along with it.

We above all need to ensure that the new and old parts of the town work together in one cohesive unit rather than a hotchpotch of housing estates; to do this we need to invest equally in the current town as well as in the new sites.

My main concerns have been grouped under the main headings below.

Flood Zones

As you can see from the attached PDF a lot of the existing residential development in Paddock Wood is now in flood zone 2 or 3, so wouldn't be possible to build new housing on it now (including my house is now in flood zone 3) and the local plan doesn't make any reference to adding new flood mitigation measures for the existing housing stock as far as I can see.

The local plan is now proposing to build on *every part* of Paddock Wood that is in zone 1 which just highlights it's all about just getting the number of dwellings in a plan to meet a target rather than build something of social value.

Road Network

The plan is looking to add three new junctions on to the A228 for the new developments to the west of Maidstone Road; which on the face of it is OK as it means the traffic for these won't directly be going via the centre of the town, but they still will for shopping etc. and I have concern these new roads will just become rat runs through the new housing developments between Maidstone Road and the A228 especially as the existing improvements to the 'dampers corner' roundabout by Colts Hill / Five Oak Green looks to be on a permeant hold.

Railway Bridge - the plan to make the railway bridge on Maidstone Road as a 'Shuttle signal Bridge' which looks to be traffic light controlled one way traffic.

This is i'm assuming to allow for better cycling and pedestrian access but it will cause more congestion and pollution while traffic waits for the lights, or cause traffic to use the

dampers corner roundabout which is already too small for the existing traffic. The only advantage of this scheme I could see is if it enable traffic from the north to turn left into Station Road / Waitrose (with road realignment) rather than having to go further south to use Commercial Road to go north to the station / Waitrose / new Church Road developments but this hasn't been looked into.

Commercial Road - As referenced above this is already contested and the local plan makes no reference to any improvements to resolve this with the new housing to the West that is within the plan and the 1,200 houses out to the east along Church Rd / Elm Tree / Mile Oak where I think outline planning permission has already been submitted. Ideally here the top end of commercial rd needs to be either one way (North / South) or pedestrianised with station road improved to take two way traffic to Maidstone road with full access over the railway bridge in every direction.

Badsell Road - the junction improvements look to be on hold again here to improve there scheme for active travel and the impact of an enlarged Mascalls School, so this local plan is just causing stalemate in getting infrastructure improvements required for the three large developments already underway in the town.

Town Centre

The town centre in Commercial Road is in need of improvement given the current size of the town and there is no reference to this in the local plan; I suppose it might eventually get included in a supplementary planning document at a later point in time, but this should be at the very core of any successful town and community. At the very least we need to establish a business improvement plan for Paddock Wood to ensure there is a variety of styles / sizes to encourage new business start ups.

Active Travel

The local plan makes all the right noises about walking and cycling in the new developments, but nothing about adding / integrating these into the existing town. If people are going to adopt walking / cycling they will only do it if it fully integrates into the existing community from A to B; e.g. cycle paths to/from the station, school(s), commercial road etc.

Public Transport

The circular Paddock Wood bus route sounds great, but apparently this was also supposed to happen as part of the Green Lane development in the 90's and never did; so the local view at best is '...believe it when I see it...'

Certainly better bus services between Tonbridge / Tunbridge Wells / Maidstone is required to support employment opportunities in the area and the nighttime economy; so this means services that start early in the morning and late into the evening.

A direct train service between Tunbridge Wells via Tonbridge / Paddock Wood to Maidstone (without changing at Tonbridge) should be investigated with a possible travel time around 40 minutes and could take traffic off local roads and ease congestion of the A228 and the Pembury Road etc.

You can get to London quicker by train than you can Tunbridge Wells by train and even by car at peak times...

Schools

The plan looks to be heading towards just enlarging Mascalls which would make it I think the largest in Kent.

The better option is for the new school up by Eastlands and slightly reduce the capacity of Mascalls; so when in the next version of the plan and the housing that was supposed to get including at Tudley gets built there is the option of expanding both sites.

The new Primary school on the corner of Green Lane / Drumbrell Drive the last I heard was supposed to open for September 2025 but no sign of it.

There is supposed to also be a new primary school in the Church Rd / Elm Tree / Mile Oak development, but if the Green Lane one hasn't started yet then I can't see that happening. So what does that mean for the new primary school within the local plan at Eastlands, are these just empty promises with no intention of them ever being build and eventually the last will be returned to the developer to build more dwellings on.

Sports Hub / Sites

A lot of the sites the borough is looking to use for this are owned by the Town Council and not the borough and the lack of advance two-way dialog with the town council and existing community sports clubs hasn't been well received and won't lead to successful sporting venues without consulting the local groups and their national governing bodies to ensure the plans are viable and conform to their latest guidelines.

The Paddock Wood Neighbourhood plan intending for a sports hub to be north of the railway at Eastlands the local plan has ignored this a placed it in the south of the town.

Existing s106 monies / projects

The Town Council has a lot of 106 monies due to it over the next couple of years and the local plan is just causing these projects to just stagnate until the over arching Local Plan gets agreed and 'made'. This will just increase the local communities view that they aren't getting the extra facilities / infrastructure to go alongside the three current developments in build.

Social Housing

The plan does make a vague reference to housing for elderly / care schemes, which is great but nothing about social housing for social rent for the local community, just assuming the developers will build their quota.

It would be great if Town & Country Housing could get a name check to have reserved sites for those on the housing register.

Healthcare

The existing GP surgery in the town has closed it list for new patients, along with some of the other GP practices in neighbouring towns and villages; with the knock on effect on the pharmacies in the local area.

The local plan makes no reference to new facilities, only improvements on existing sites, and even that is implied rather than explicitly, spelt out in the plan.

We should investigate the possibility for some of these services to be delivered at a sports centre but turning it into a heath and sports centre where certain routine healthcare needs can be catered for with an emphasise of prevention rather than cure to develop a healthier community thereby reduce the pressure on the medical facilities.

Employment

The local plan only looks to be making reference to allowing for more warehousing / freight movement sites in the area which will just increase the number of HGV's without any increase in road improvements to / from A21, A228 etc.

In general these will only allow for the lower wage jobs and won't encourage / support a more mixed employment environment in Paddock Wood and will increase the number of people commuting to / from the town based upon the prices of the existing housing stock to find employment that can support the rent / mortgage.

Brown Field Developments

The local plan outside of Paddock Wood / East Capel doesn't explore enough the prospect of using brown fields sites to deliver any meaningful new homes, but seemingly just rely

on this for the delivery of the windfall sites.

The use of brown field areas should be revisited to reduce the reliance on building on green field sites.

Regards

Mark Munday

