

1) Please confirm which document this representation relates to.

Schedule of Proposed Main Modifications

2) Please confirm which part of the document this representation relates to? (If your representation relates to multiple sections and/or documents, please add separate comment(s) to the relevant section on this event page)

If Main Modification (please quote number e.g. MM1):

MM16,

Chapter and (if applicable) subheading:

Policy/ Paragraph number:

Policy STR1

3) Do you consider the Main Modification/ document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038):

Yes No

Legally Compliant

*

Sound

*

4) 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. Or 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.

These modifications are not sound as they do not lay out the importance of the infrastructure other than flooding. There are significant risks in many other areas.

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 in question 4 (above) where this relates to legal compliance or soundness. Please be as precise as possible.

We are very concerned to see the limited wording used in this paragraph. As described it is a major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions but there is no wording to indicate that other mitigations are required before Paddock Wood has yet another development. There is no insistence on road infrastructure, improved rail infrastructure, rail crossing plans, water and sewage pipes. This should be laid out clearly as an expectation of this development and all other developments in Paddock Wood.

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

MM22 - Paragraph 4.95

We also feel this section is not legally sound "Provides for some reductions in the area of the Green Belt, notably for **land in east Capel (adjacent to Paddock Wood)** and the strategic sites and around Royal Tunbridge Wells and Pembury, where exceptional circumstances warrant **release of land from the Green Belt**" - There is no "exceptional circumstances" that warrant release of the land from the Green Belt. Paddock Wood has already had a significant amount of building work, far more than the rest of the Borough so we would refute the fact that there are exceptional circumstances requiring the housing to be built on Greenbelt adjacent to the town.

Education: a new secondary school at Tudeley Village and **eExpansion of existing secondary schools at Paddock Wood (or if expansion is not feasible a new 4FE Secondary School on safeguarded land)** and Royal Tunbridge Wells; six **four** forms of entry of new primary provision at Paddock Wood/Capel - How does this make any sense when we have a 3 form entry primary school already approved and not built yet on the Dumbrell Drive development and so only 1 form of entry is therefore required and yet a number of planning applications for the paddock wood area already include primary schools. Our argument is that we have no additional nursery provision and no additional GP provision until the last set of development so far planned. Why can the GP and other infrastructure not happen sooner than the other primary schools. This appears to be poor planning by TWBC.

Health: provision of new medical facilities at Paddock Wood/ Royal Tunbridge Wells, Cranbrook, Hawkhurst, and Horsmonden, as well as expansion of a number of existing premises, including at Pembury - this is not sound as there should be a timescale put to this as we have been told in Paddock Wood that the GP facilities would not be considered for around 7 years by which time 1000s of additional houses would already be built. There also needs to be confirmation that conversations have been had with the NHS / ICB etc to fund the additional services and GPs

Water: additional capacity at waste water treatment works and the sewerage network across the borough to accommodate growth. A range of significant flood mitigation measures at Paddock Wood/Capel - This does not take account of the significant amount of work needed to repair the existing infrastructure. Some roads near Paddock Wood have been closed 3-4 times recently to repair water pipes due to the leaks. There is also significant flooding around Paddock Wood in the winters, shown by the fact that the proposed road changes on Badsell Road were delayed due to the flooding.

Utilities: improvements to be made across the whole borough to be able to access high quality and future-proofed broadband connectivity – ultra fast fibre to the premises - This is not sound as it should indicate which premises. When Foal Hurst Wood was being built the BT engineers disconnected our Broadband because there were not enough access points to connect Foal Hurst Wood properties. This is unacceptable. Also, does this mean existing premises in Paddock Wood should get fast fibre? Surely it is only right and equitable that it should be new and existing houses that benefit from this.

Sport and recreation: a new stadium sports hub at Royal Tunbridge Wells, as well as a smaller local sports hubs around, or close to, the Main Urban Area and significant new provision to serve the strategic sites at Paddock Wood (including land at east Capel) - There is no mention here of the other improvements that are planned for Paddock Wood sports facilities.

the main concern with all of the above is that there is no indication in the plan that firm agreements are in place with the relevant parties ie KCC for schools and roads, Southern water, Network Rail, NHS/ICB etc to ensure that these infrastructure improvements are made in a competent and timely manner. In fact there is nothing to guarantee they will happen at all. The proposed school at Dumbrell Drive still has not even been started. Yet there are a number of new planning permissions including space for a primary school. There are plans for a footpath over the railway for the land at East Capel but there is no indication that Network Rail even agree that. The houses are being built but the infrastructure isn't following appropriately. The roundabout at Badsell - according to your planning clr - legally needs improving - but work won't start for 7 years. It isn't acceptable for local residents to live with all of the upheaval, traffic issues, lack of GP appointments, waits in ED, delays in hospital treatments etc. The infrastructure needs to keep pace with the building work.

I may have mentioned issues that are not strictly amendments to the plan. Last year I commented at length on the original plan before the hearings in July. I can find no trace of that online so cannot see what myself or others raised. The fact that we are expected only to comment on the soundness or legality of the proposed amendments means that many people do not know how to comment, they do not understand the law and therefore feel disempowered from commenting. The entire consultation, accessibility of the documents, length of the documentation and general complexity of replying means that this is simply not a fair consultation as lay people cannot possibly be expected to understand and be able to reply.

7) Please tick this box if you wish to be kept informed about the Inspector's Report and/ or adoption of the Local Plan.

Yes, please keep me informed