



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

Representation Form

Please use a separate sheet for each representation

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:	Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal
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Completed forms must be received at our offices by **midnight Monday 26 February 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

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	Miss	
First Name	Nicola	
Last Name	Leeds	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	

Address Line 2	██████████	
Address Line 3		
Address Line 4		
Postcode	██████████	
Telephone number		
Email address (where relevant)	████████████████████	

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

Name or Organisation	
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3.	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?	
Chapter and (if applicable) sub heading		
Policy		
Paragraph number or appendix		

4.	Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it: (please tick as appropriate)				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>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.</p> <p>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.</p>
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The text box will automatically expand if necessary.

I remain concerned that the council has not undertaken sufficient, effective consultation with neighbouring local authorities, or with the Paddock Wood Town Council which represents the people most impacted by this draft plan. The plan remains unsound. Insufficient consideration has been given to alternatives to strategic growth at Paddock Wood including east Capel, there is a lack of critical infrastructure to support the proposed significant and excessive expansion of Paddock Wood, existing residents of Paddock Wood will be adversely impacted, and the proposals do not mitigate these. Specifically, there is insufficient consideration of the increased risk of surface water flooding from the proposed additional development – this will particularly impact on existing residents, the existing water and sewage services are already unable to cope with the level of housing in Paddock Wood. There is no mention of providing additional medical services in Paddock Wood – the existing surgery has already been forced to close its books to new patients.

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.

6. 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.

The text box will automatically expand if necessary.

Whilst I support the removal of the Tudeley Garden Village from the draft plan, and also support the reduction in proposed housing in Paddock Wood including east Capel, significant changes are still required for the local plan to be fit for purpose. The Tudeley village should be removed completely as a possible site – as drafted the plan leaves future development as an option. Even in the limited cases where additional infrastructure for and around Paddock Wood has been included – there are either unrealistic costings which will reduce the likelihood they will happen, or there is no clear approach to ensuring the necessary infrastructure or services improvements are in place BEFORE further development. Paddock Wood has already been subject to significant increase in housing without the infrastructure changes – for example just look at the stop gap approach to increasing sewerage facilities where we were promised a more future proofed project than was delivered,

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>Green Belt – I do not support the proposal to declassify east capel as green belt land. This land should be protected. I do not consider that you have demonstrated the necessary exceptional circumstances.</p> <p>Bypass of Colts Hill – I am concerned that the proposed bypass of colts hill will have irrevocable damage on local wildlife and biodiversity. The costings provided are significantly different to those previously provided with no explanation about why this is the case.</p> <p>Paddock Wood strategic growth – whilst I support the reduction in development and not developing on flood zone 2 and 3 areas, this needs to be future proofed. Consideration of surface water flooding issues needs to be fully included – some of the land proposed for development even under the new proposals floods during periods of significant rain. The knock on impacts on existing housing in Paddock Wood has not been fully taken into account.</p> <p>The updated proposals do not address issues previously raised regarding the imperative that infrastructure improvements are delivered BEFORE further development. Recent projects to improve sewerage in Paddock Wood have only addressed pre existing issues – they were not designed for a further very significant increase in housing. There is a lack of medical facilities in Paddock Wood – the level of proposed development without an increase in GP and other medical facilities is unacceptable.</p> <p>The proposed changes now completely disregard the need for development of Paddock Wood Town centre – the lack of retail space – caused at least partly by the approvals for development on retail space compromises the aims of the Neighbourhood plan to have a thriving community. Indeed the recently agreed neighbourhood plan has been completely disregarded.</p> <p>Transport – proposals to change traffic over the railway bridge, and potentially make it one way, will have a significant NEGATIVE impact on Paddock Wood, its businesses and its residents – I DO NOT support this. It</p>

has clearly been suggested by someone who have never experienced the reality of living in paddock wood.

Environment – I do not consider that enough consideration has been given over the environmental impact, and specifically the impacts on biodiversity, of the proposed developments. The area that is being proposed for development is rich in biodiversity, with a wide range of birds and small mammals that should be protected. The retention of hedgerows and trees should be a prerequisite for any development, with any developer who removes them immediately forfeiting their right to continue to develop the land.

Sporting facilities – while I support the proposal for a swimming pool to be built in Paddock Wood, I have no confidence that these facilities will actually appear. The level of proposed increase in sporting/leisure facilities is not commensurate with the number of additional homes proposed.

There have been changes to the national planning policy framework – these have not been taken into account in the draft plan. TWBC needs to stand up for its local residents. It is unfair that TWBC are proposing to force 50% of the proposed additional housing on Paddock Wood, thereby fundamentally changing the character of what was until recently a large village.

It is unclear what TWBC mean by undertaking an immediate review of the local plan as soon as this one is agreed – all that means is that the decisions that are being made will be potentially unmade, with the potential (likelihood) for even more unsustainable development to be proposed.

More needs to be done to force developers who gain planning permission to deliver on that, and not bank land, and priority should be given to brownfield development NOT digging up of green fields, particularly in green belt.

Additionally I support the comments made by Paddock Wood Town Council.

8. 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

Yes, I wish to participate at the examination hearings

9. If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:

Click or tap here to enter text.

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 hearings stage once it resumes.

Sustainability Appraisal

10.	To which part of the Sustainability Appraisal does this representation relate?	
Chapter and (if applicable) sub heading		
Policy		
Paragraph number or appendix		

11.	<p>Please use this box for any comments you wish to make about the Sustainability Appraisal.</p> <p>The text box will automatically expand if necessary</p>	
<p>Click or tap here to enter text.</p>		

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	N Leeds	Date	25/02/24
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