

From: [REDACTED]
To: [Local Plan \(TWBC\)](#)
Subject: Public Consultation on Tunbridge Wells Borough Council's Response to the Inspector's Initial Findings Letter on the Examination of the New Local Plan
Date: 25 February 2024 16:00:58

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Dear Sir or Madam

I have decided to respond to your request for comments by general email rather than by the structured response questionnaire as I think the latter narrows and constrains the responses to a set format and although this may be administratively simpler for you it inevitably, if not deliberately, reduces the scope for expression of views.

The document on which you seek comments has been produced on the back of a large number (over 20) core documents each of which is substantial in its own right and which is often based on extremely technical information which the average citizen is unlikely to be able to digest and understand in the six week period available. It is inevitable therefore that many people will simply accede to your proposals or decline to comment and you will therefore naturally assume that they agree with your conclusions. However, this does not follow.

I therefore support and commend to you the very substantial and considered response put together on our behalf by Paddock Wood Town Council and would like this support to be duly recognised in the consultations. I strongly condemn the fact that TWBC did not share this information fully with PWTC throughout the process of it's compilation. The fact that TWBC were not REQUIRED to share that information does not mean that TWBC SHOULD NOT do so. That TWBC DECIDED not to share it demonstrates clearly the long held view in Paddock Wood that they do NOT consider the interests of Paddock Wood residents to be relevant to their decision making. Whatever FORMAL procedures are recommended by Central Government, they should not prohibit greater collaboration sharing and consultation between TWBC and the neighboring TCs in practice. Working together in harmony will produce better decisions.

Many of the studies described in the core documents involve mathematical modelling. Several of them mention that the database of environmental, population, consumer behaviour and other data needed for input into these models is extremely limited and in some cases inadequate. The COVID epidemic itself has substantially changed the way people behave, work and travel and it is likely that such changes may change unpredictably into the next decade as well. Planning needs to be spread over a wider timescale, not shorter. As someone who has spent an entire career in Central Government in the area of computer and mathematical modelling and decision making I am fully familiar with the expression "Garbage In - Garbage Out" to characterise the real value of these models. At best they might be indicative, at worst they might be completely wrong. We should NOT be basing these important decisions on the shifting sands of transient behavioural trends. We should always be employing the precautionary principle as widely as possible.

For example, siting new building on areas which in the past have been demonstrably subject to flooding should not be based upon an assumption that this "might" be less likely in the future. Once an estate has been built it cannot be un-built if the flooding assumptions prove to have been at fault. Similarly road traffic assumptions such as the putative

improvement of the A228 via Colts Hill which is actually in the gift of KCC and not the TWBC. Such an improvement has continually been proposed only to be later postponed or cancelled in the past and whatever the current status of such plans any other local changes should be completely conditional on that improvement actually occurring and carried out contemporaneously rather than in anticipation. In fact if such local changes are made in anticipation these can quite easily then be used as evidence to postpone or even cancel the latter.

It has also been suggested that Green Belt land may be eroded by discretion if the necessity to meet Central Government housing targets requires this. Again, it is time to argue against that. Such targets are to a great extent arbitrary and are based upon assumptions and data which are similarly suspect. The fact that someone, who is not aware of the flooding, congestion, pollution and other pressure on resources that Paddock Wood faces, arbitrarily decides would be desirable if their modelling were to be trusted does not mean that they are practical in reality. Quite the opposite. Proper planning should begin at the grass roots level and then be aggregated upwards. Projections should be based on clear and demonstrable evidence, not on tentative speculation and this needs a much more cautious approach to the care and use of our environment than TWBC have hitherto demonstrated.

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Dave Smith ([REDACTED])
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