



**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:	Please see attached representations.
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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.

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

Name or Organisation	Paddock Wood Town Council
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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 representations attached.	
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 checked="" type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. 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.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The text box will automatically expand if necessary.

Please see representations attached.

6. 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.

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.

The text box will automatically expand if necessary.

Please see representations attached.

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>Please see representations attached.</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	
	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 Town Council wishes to participate in any future Hearings on the Local Plan given the scale of growth still proposed at Paddock Wood and given the well-known constraints and complexities of the area as well as the Local Plan, masterplanning, infrastructure delivery and funding uncertainties that still remain.</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		Date	23.10.2024
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Paddock Wood Town Council Representations

**Tunbridge Wells Borough Local Plan
Consultation on the Council's New Evidence
Base Documents**

Consultation: 11th September – 23rd October 2024

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These Representations are prepared and submitted on behalf of Paddock Wood Town Council (PWTC).

1. Introduction

- 1.1. Paddock Wood Town Council (PWTC) has extensive comments on the Local Plan documentation that is the subject of the current consultation. Much of this critical information such as the updated Infrastructure Delivery Plan (IDP), Viability Study and many transport studies have been produced extremely late in the Examination process.
- 1.2. Unfortunately, despite all of TWBC's efforts the production of this additional / updated evidence and proposed 'rewrite' of Policy STRSS 1–Paddock Wood and Land at East Capel (S_095) and proposed modifications to Policy STR1–The Development Strategy (PS_109) the Plan and its evidence remain unsound and incoherent.
- 1.3. Given the extent of the new documentation and its importance we respond to each document separately in our response below.
- 1.4. We note that there is clear lack of reference to the made Paddock Wood Neighbourhood Plan in the proposed 'rewrite' of Policy STRSS 1 and in the IDP.
- 1.5. Referred to in our representations are the following documents which are attached as Appendices:
 - Appendix 1:** Comments on the 'Walking and Cycling Strategy for Paddock Wood and East Capel.
 - Appendix 2:** Minutes of the Local Plan Sports Meeting 08.102024
 - Appendix 3:** *Start to Finish How quickly do large-scale housing sites deliver? THIRD EDITION (September 2024) Lichfields*
- 1.6. As we have set out in our previous submissions and at local plan hearings, the Town Council is committed to working with TWBC, KCC, developers and other key stakeholders on all matters relating to the growth of Paddock Wood. We explain in Appendix that the Town Council wishes to specifically share its feedback and its proposals on the 'walking and cycling strategy' for the town and growth areas.

2. PS_093 Tunbridge Wells Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment 2024-2039 Final Report (June 2024)(V2)

- 2.1. The Town Council identified in its Local Plan Regulation 19 representations in June 2021 that TWBC's GTAA was, at that time, published nearly 3.5 years previously and that it was clearly out of date. These representations were presumably ignored until the Inspector has required the Council to prepare an update.
- 2.2. The Study concludes that there is a need for 29 pitches based on the 'ethnic definition' and 20 pitches required from 2024-2039 based on the PPTS 2023 definition.

Table ES.1: Gypsy and Traveller permanent accommodation needs

Period	Ethnic definition	PPTS 2023 definition
2024-29	12	4
2029-34	8	8
2034-39	9	8
Total	29	20

Source: GTAA 2024

Source: PS_093 Table ES.1

- 2.3. It states (para ES18) that:

"It is important to note that the figures shown in Table ES1 include all needs as of 2024, including any which may have been identified by previous GTAAs but remained unfulfilled by the time of this assessment."

- 2.4. What does this mean that the figures include needs from previous GTAAs yet remain unfulfilled? Which GTAAs is it referring to? There is nothing further in the study that explains this statement as far as we can see.

- 2.5. The Study states (para 4.12) that (our emphasis):

"New sites should avoid areas within National Landscapes and those prone to flooding, due to the particular vulnerability of caravans."

It explains in this paragraph that it is crucial that any new sites are located close to the families whose needs they are meant to address and meet the PPTS criteria.

"It is crucial that new sites are located close to the families whose needs they are meant to address and meet the criteria set out in the Planning Policy for Traveller

Sites (PPTS). Areas in proximity to administrative boundaries could also be considered for discussion.”

However, for more detailed and informed decisions, it is important to refer to the latest GTAA findings.”

2.6. Given that new sites should avoid areas prone to flooding particularly due to the vulnerability of caravans why is TWBC proposing pitches at Paddock Wood? The indicative area identified in the Master Plan document can be flood from surface water run off during periods of heavy rainfall which does not appear to have been taken into consideration.

2.7. Furthermore, what evidence is there that the proposed sites in Paddock Wood are located close to the families whose needs they are meant to address? The Town Council has a number of examples that suggest that the need for pitches is not fully evidenced in Paddock Wood. We provide these examples below:

- **Newbridge Park, Maidstone Road, Paddock Wood**¹ This site has just been given retrospective planning permission for an additional 9 pitches which most are already in place. However, there is some confusion over the application about whether these are Gypsy and Traveller pitches or homes for people over 50 or both.



Newbridge Park (photo taken on 10th August) pitches/park homes being sold on the open market

- **Five Furlongs Five Furlongs Country Park Queen Street, Paddock Wood**² This was a previous Gypsy and Traveller site which is now a caravan park/park home site. We assumed the change of use was agreed in 2016 because these plots were no longer required.

¹ <https://www.wardsofkent.co.uk/property-for-sale/2-bedroom-park-home-for-sale-in-maidstone-road-staplehurst-kent-13626896/>

² <https://montecarloparcs.co.uk/residential-park-homes-in-kent/>

2.8. In addition, there is a concern that TWBC is not aware of what is currently on site across the plots and pitches in the Borough and these do not appear to be monitored once planning permission has been approved.

3. PS_094 Gypsy and Traveller Pitch Statement (September 2024)

3.1. The Statement (para 5) explains that"

"Table 1 indicates the total level of need for Gypsy and Traveller pitches within the borough as identified within the 2024 GTAA. It is noted that the GTAA provides two need figures: one based on the ethnic identity definition, and one based on the PPTS 2023 definition. The ethnic definition includes all Gypsies and Travellers regardless of whether they have ceased to travel or not, and the PPTS definition includes Gypsies and Travellers who have permanently or temporarily ceased to travel due to their own or their family's or dependants' educational or health needs or old age."

Table 1 - Gypsy and Traveller Pitch Needs Between 1 April 2024 and 31 March 2039

Period (1 April to 31 March)	Pitch Need (Ethnic)	Pitch Need (PPTS 2023)	Transit Site Plots
2024 - 2029	37	29	0
2029 - 2034	8	8	0
2034 - 2039	9	8	0
Total 2024 - 2039	54	45	0

PS_094 Table 1

3.2. The Statement (para 4) also explains that the new GTAA takes account of previous undersupply:

"This revised GTAA identifies the level of need between 1 April 2024 – 31 March 2039. This position also takes account of any previous under-supply".

3.3. However, it is unclear between the 2024 GTAA and the Council's Statement what exactly the 'previous under-supply' actually is. For example, why is the Pitch Need (2024-2039) 20 in the GTAA and 45 in the Council's Statement? These figures stated in the Council's document are not mentioned in the GTAA, so it is entirely unclear how the 'previous under-supply' has been calculated and seems to be a very important aspect that needs further explanation.

3.4. Furthermore, TWBC has not explained how the Council has considered whether any changes to its Local Plan policies are required including the location of potential allocations. For example, the GTAA states that accommodation should be avoided in areas prone to flooding and that it is crucial that new sites should be located close to existing families.

4. PS_095 Revised Policy Wording for Policy STRSS 1– Paddock Wood and Land at East Capel (09_2024)

- 4.1. The Town Council provides its comments on the new policy STRSS1. We consider that it is misleading for TWBC to describe this as 'revised policy wording' as it is a completely new policy. This demonstrates the unsoundness of the previous policy which the Town Council has set out in its previous representations and statements for the past three years.
- 4.2. Whilst the proposed new policy wording is an improvement on the previous policy, we consider it to still be unsound. We explain the reasons why and our suggested changes required to make it sound. However, these representations in no way infer a change in our stance that the overall Local Plan development strategy and that for Paddock Wood is unsound for all the reasons we have clearly set out previously.

Terminology of Master Plan Areas

- 4.3. The terms 'parcels' and 'masterplan areas' appear to be used interchangeably and are confusing. They should be changed to 'Master Plan Areas' which aligns with the title of the map called 'Master Plan Areas for STR/SS1 Paddock Wood and East Capel Strategic Policy'. In addition, the Town Centre is not a 'parcel' and the South-Eastern Parcel (C) is not just one parcel now that TWBC is proposing the area 'Mascalls' as part of this Master Plan Area.

Development Principles

Policy Paragraph 1

- 4.4. The Policy states that it *"sets provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period providing for approximately 2450 dwellings and associated infrastructure"*
- 4.5. We have a number of points to make regarding this proposed approach to setting the **Limits to Built Development** for Paddock Wood:

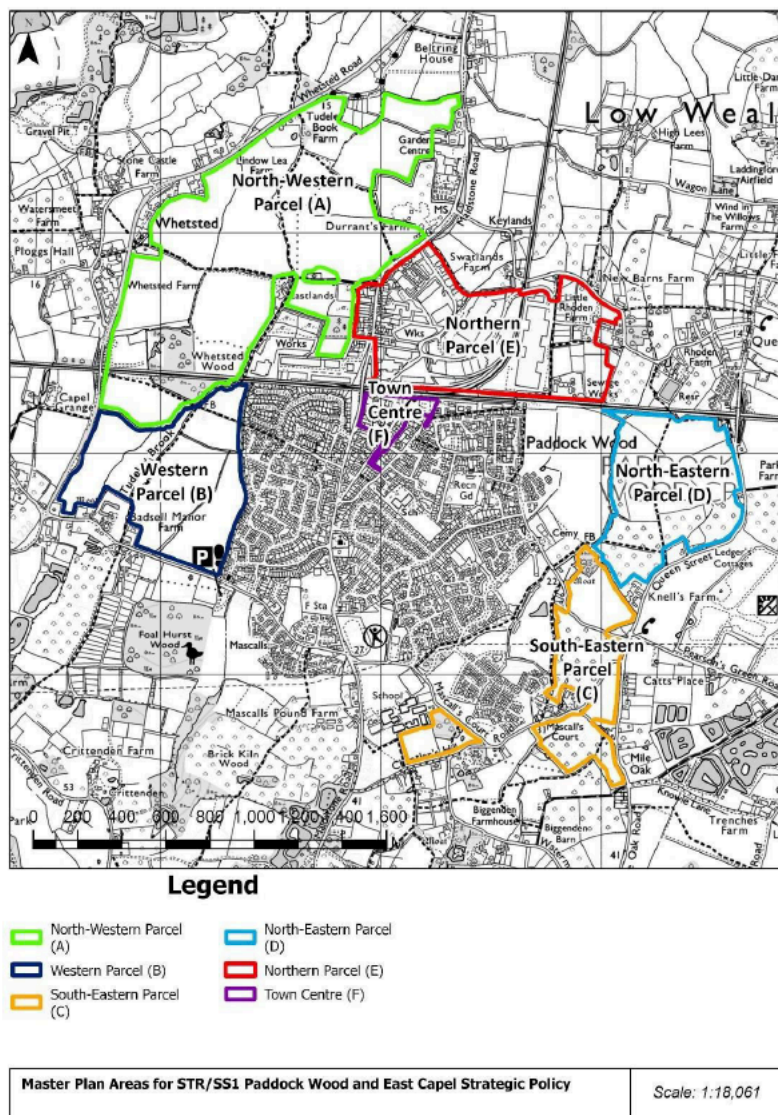
Inconsistencies and lack of clarity between the Policies Map (inset map) and the 'Master Plan Areas' map in the Local Plan. The Master Plan Areas should be indicated on the Policies Map otherwise it is not possible to decipher what is part of this policy for Master Plan Areas and what is not.

Inconsistencies between policy wording in Policy STRSS1 and Policy STRA/PW 1(The Strategy for Paddock Wood). The latter policy refers to 'illustrative Limits to Built Development' which differs from 'provisional' Limits to Built Development.

The proposed 'limits to built development' for the Green Belt area west of Paddock Wood are unaltered despite a reduction of circa 1,000 dwellings. This a point that the Town Council has raised previously.

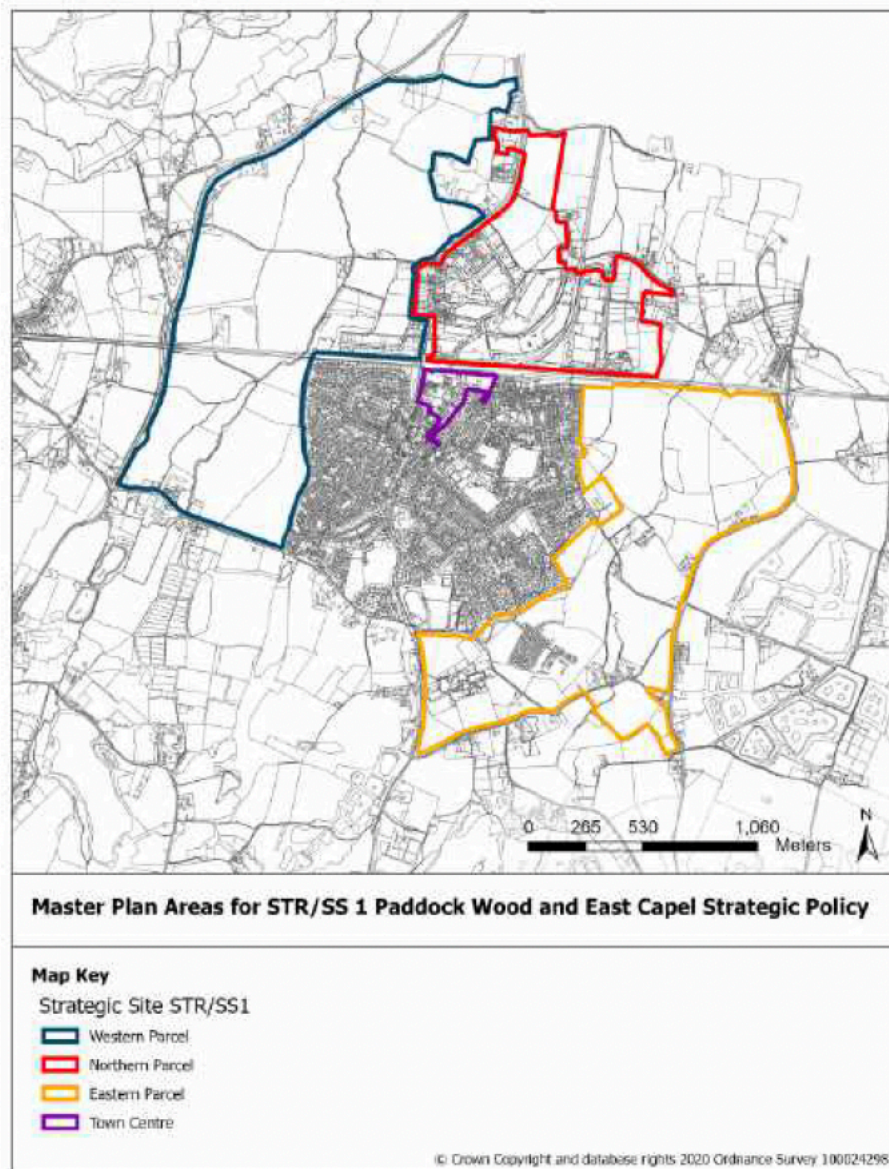
The strategic site allocations have different boundaries to the ‘limits to built development’.

4.6. “The development strategy for Paddock Wood and east Capel in conjunction with Policies STR/PW 1 (the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish), sets provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period providing for approximately 2450 dwellings and associated infrastructure.

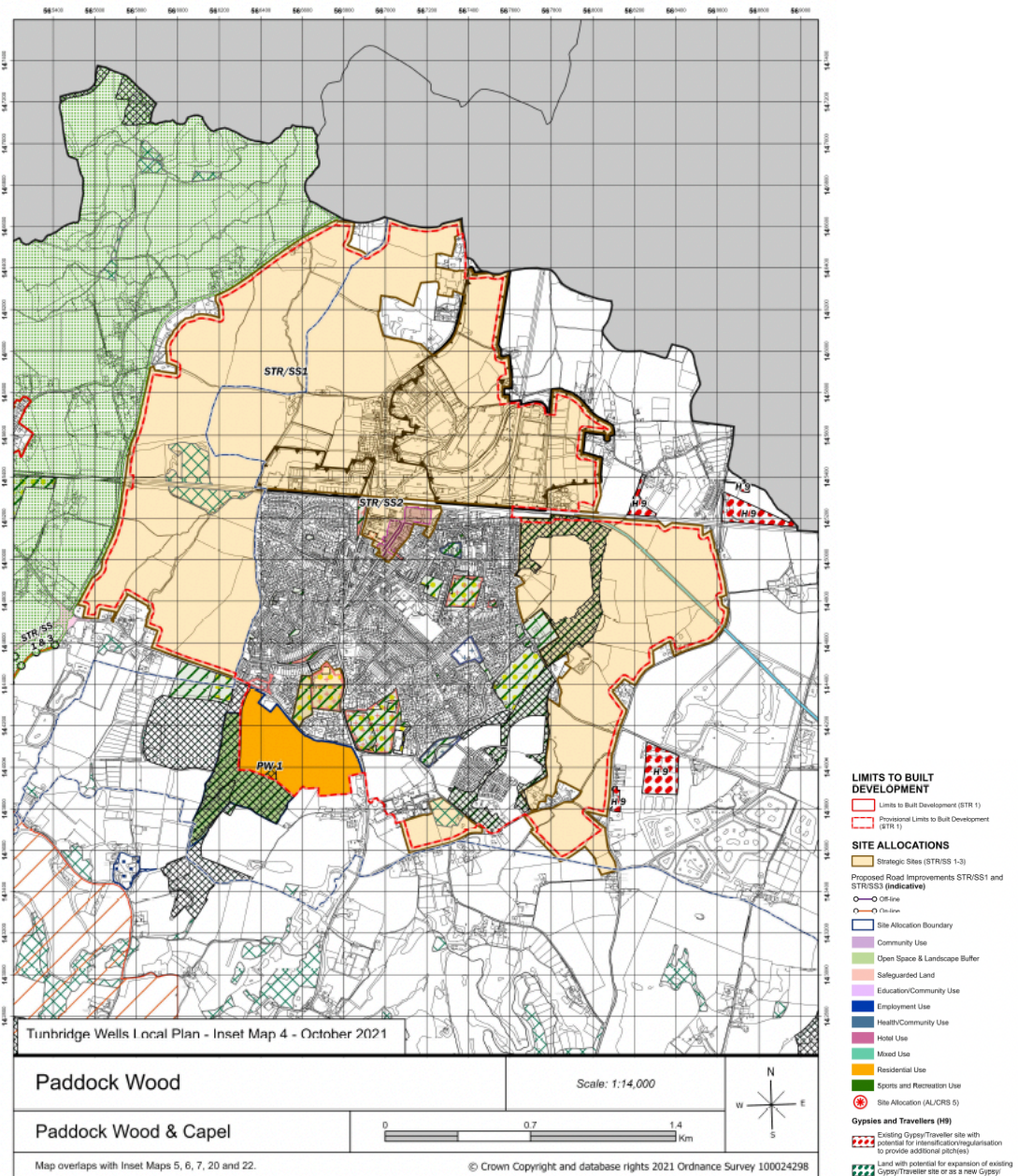


Source: PS_095 Master Plan Areas

Map 27 Masterplan Areas



Submission Local Plan Master Plan Areas



Submission Plan – Policies Map (Inset Map 4)

4.7. The Policy states that:

“This is facilitated through the release of Green Belt land to the west of Paddock Wood, with development to be carried out on each of the development Parcels identified on Map 27 as follows;

- A. North - Western Parcel (edged in green) – approximately 770 dwellings.
- B. South - Western Parcel (edged in dark blue) – approximately 520 dwellings.
- C. South - Eastern Parcel (edged in yellow) – approximately 560 dwellings.
- D. North - Eastern Parcel (edged in light blue) – approximately 600 dwellings.

E. Northern Parcel (edged in red) - approximately 4.25 hectares of Class E (g), B2 and B8 employment uses.

F. Town Centre (edged in purple on Map 27 (Master Plan Areas)) which is subject to Policy STR/SS2"

- 4.8. However, it is not just facilitated through the release of Green Belt, there is clearly also the release of a significant amount of 'countryside' to enable the proposed development.
- 4.9. It describes the "development to be carried out" on Parcels A-D as housing only. However, that is clearly not the case as is set out in the "Parcel Requirements" section of this same policy. For example, Parcel A (Northwestern Parcel) requires a primary school, three gypsy and traveller pitches, a local centre, safeguarded land for a 4-6 FE and a Wetland Park. The policy should be updated to reflect the full extent of development required on each of the parcels otherwise it is misleading.
- 4.10. We seriously question what other 'supporting infrastructure' is missing from each of these parcels in terms of, for example, road infrastructure, walking, cycling and public transport infrastructure and wastewater infrastructure. These all have spatial elements and should also be set out by each 'Master Plan Area'.

Policy Paragraph 2

- 4.11. The Policy states:

"The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be informed and guided by the Council's Strategic Sites Masterplanning and Infrastructure Study (including the Structure Plan for Paddock Wood) dated October 2023."

- 4.12. Firstly, how can the Council assess whether the whole of the allocated area will embed '**garden settlement principles**' when applications will be submitted and determined separately?
- 4.13. Despite this requirement for 'garden settlement principles', there is no clear definition for what 'garden settlement principles' shall be embedded in the development proposals. Is it the list of principles in paragraph 5.187 in the Pre-Submission Local Plan? If that is the case, then it needs to be referred to here and a policy should be added to the Local Plan setting this out. It is still unclear how these Principles were developed by TWBC. They appear to be from the Government's [Garden Communities Prospectus \(2018\)](#). We question how these Principles have been embedded in the process to date such as **Principle 9: Legacy and stewardship arrangements: should be in place for the care of community assets, infrastructure, and public realm, for the benefit of the whole**. What legacy and stewardship arrangements will be in place for the benefit of the whole? The development is supposed to be **Future**

Proofed (see Principle 10) through 'resilient places' including flood risk and water availability. We question how the proposed strategy delivers a resilient place.

4.14. The Policy states that each Parcel also needs to be guided by the Strategic Sites Masterplanning and Infrastructure Study (including the Structure Plan for Paddock Wood) from 2023. We have already set out our many concerns with the inadequacies of these documents in our previous submissions and do not repeat these here. The Masterplanning and Infrastructure Study is now out of date due to all the proposed changes since it was published. This section of the Policy should refer to the need for development to be guided by additional documents, specifically including reference to the Infrastructure Delivery Plan.

4.15. Furthermore, how have the garden settlement principles been accounted for in the **Viability Study**? There is no mention of these in the Viability Study let alone costs assumed for ensuring the principles are achieved in the future proposals which would clearly result in additional development costs.

Policy Paragraph 3

4.16. Paragraph 3 sets out a list of requirements for the 'development proposals as a whole'. The wording in paragraph 3 is different to that in paragraph 2 which refers to the 'allocation as a whole'. Our point still stands regarding the feasibility of assessing the development or allocation as a whole when applications will be submitted and assessed separately. We address each of these requirements below:

(a) This clause states that the development proposals as a whole shall provide a mix of housing types, size, and tenure in line with Policy H1. However, the first paragraph of Policy H1 uses almost the same wording as clause (a). The second paragraph simply refers to relevant Local Plan or neighbourhood plan policies for the area. We do not see any other local plan policies that provide more detail and the Paddock Wood Neighbourhood Plan Policy PW HI1 (Housing Type and Mix) also refer to the requirements of the Local Plan. Policy H1 of the Local Plan then states that requirements may be informed by 'intelligence' such as 'local planning evidence base' 'parish housing surveys' and 'other relevant analyses'. This results in a 'circular' policy that is ineffective.

Policy H 1

Housing Mix

Proposals for residential development should support the creation and maintenance of balanced communities by providing an appropriate housing mix with a range of sizes, types, and tenures of dwellings.

The mix should reflect any requirements set out in relevant policies in the Local Plan or a 'made' neighbourhood plan for the area, and may be informed by intelligence on local housing needs and demand, including that contained in local planning evidence base documents, parish housing surveys, and other relevant analyses.

Submission Local Plan Policy H 1 (Housing Mix)

- (b) This clause refers to the delivery of 'mixed communities' but does not define what this means. It only specifically mentions accommodation for those with different accommodation needs including the needs of older people. Are there any other types of accommodation that need to be listed here? What is the need based on? It then requires 'at least' one sheltered and one extra care housing scheme one in the east and one in the west. This does not provide any detail in terms of the scale of older persons provision and how this might meet any identified needs. What is meant by 'one on the east and one on the west' – which parcels is this actually referring to? Who will oversee these housing types? Will these be KCC run or private or mixed?
- (c) This requires that a 'landscape led' approach be taken which the Town Council supports. To help clarify what is meant by 'landscape led' and therefore for the policy to be effective we consider more information is required defining 'landscape led'. We note this term is also used in Policy STR 8 of the Local Plan. This clarification and elaboration of the term should be provided in the supporting text and also in the Glossary to the Local Plan otherwise it is unlikely to be effective. We would recommend the Council refer to the [South Downs Local Plan \(2019\)](#) and [South Downs Design Guide SPD \(2022\)](#) for good definitions for landscape led design.
- (d) -
- (e) Policy EN 3 (Climate Change Mitigation and Adaptation) refers not only to 'zero carbon and low emission development' but also to 'development that allows communities, infrastructure, businesses, and the natural environment to adapt to the impacts of climate change'. Given that the draft policy for Paddock Wood includes no reference to 'climate change' this should not be overlooked as a key part of needing to be aligned with Policy EN 3. **It is unclear from this policy or in TWBC's documentation how the development will actually deliver its energy requirements. Will this include the requirement for developers to include solar panels on the new homes and will rainwater capture be required on the new homes?**
- (f) Map 28 is presumably the Paddock Wood and East Capel Structure Plan. Map 28 does not even indicate 'schematically' how 'informal and formal recreational needs' and 'areas of green and open space' are provided. This is clearly not justified or effective and the recreational, green and open space requirements need to be set out in this policy and justified by technical evidence base. This current lack of clarity is likely to lead to inadequate and poorly designed recreational, green and open spaces which are clearly required to support this strategic development.

- (g) Whilst policy EN 9 refers to the biodiversity net gain 'hierarchy' in relation to mitigation as set out in paragraph 186(a) of the NPPF it fails to adequately set out the Biodiversity Gain Hierarchy which is distinct from the NPPF 'mitigation hierarchy'. This is explained in [PPG](#) (Paragraph: 008 Reference ID: 74-008-20240214) as set below:

"The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for biodiversity net gain is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:

- first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and*
- then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits."*

Relying on Policy EN 9 for the proposals Paddock Wood in relation to biodiversity does not appear to be effective as there is no clear strategy in the Local Plan for how biodiversity will be addressed or at least 10% BNG will be achieved.

- (h) For a proposed strategic allocation with clear flood risk issues that are already an issue for the existing community and whereby the housing figures have been reduced by 1,000 dwellings due to flood risk, this one-line sentence in the policy is not justified or effective. The Local Plan includes policies on Water Supply, Quality, and Conservation (Policy EN 24), Flood Risk (Policy EN 25) and Sustainable Drainage (Policy EN 26) yet none of these policies are cross-referenced in Policy STR/SS1 despite these issues being of paramount importance for Paddock Wood. Furthermore, the policy wording in STR/SS1 talks simply about 'surface water runoff' and that it will not exacerbate and so far as possible and practicable improve flooding elsewhere. This wording is unacceptable and does not align with Policy EN 25 which states

"Proposals for new development should contribute to an overall flood risk reduction, and development will only be permitted where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere."

NPPF Paragraph states at paragraph 20(b) that “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: “flood risk and coastal change management”. However, there is no such strategy for flood risk management as part of the Local Plan particularly as it relates to Paddock Wood. NPPF Paragraph 160 states that “*Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding...*”. The policy fails to be informed by the SFRA, does not manage flood risk from all sources or consider cumulative impacts in or affecting local areas susceptible to flooding.

There is not a mention of drainage, water quality or wastewater infrastructure within Policy STR/SS1 despite these being absolutely critical matters for the Paddock Wood and the new development which is shocking considering the environmental and water constraints / water infrastructure issues facing Paddock Wood already and not to mention the likely impacts of thousands of new homes.

- (i) This requires that ‘viable workable minerals’ need to be extracted prior to the commencement of development ‘where practical and environmentally feasible’. Firstly, what minerals are potentially on the sites, as this is not a matter that has been discussed as part of the examination as far as we are aware. What impact would such extractions have on the housing trajectory if they need to be extracted prior to the commencement of development? What exactly is meant by ‘where practical’ and ‘environmentally feasible’? This is unclear and unhelpful wording to add to the policy.
- (j) This requirement regarding the High Weald AONB is not relevant for Paddock Wood however will be for the Colts Hill Bypass.
- (k) This states: “provide walking and cycling linkages within and between each Parcel, together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with Policy TP2” This is not an effective policy as it is missing reference to all the key infrastructure that will require safe walking and cycling links. This policy wording should also include the railway station, schools, sports, recreation, health and other key local facilities. The policy does not refer to an overall ‘walking and cycling strategy’ which is required for there to be any hope of a joined up system of walking and cycling infrastructure that will genuinely encourage and persuade residents to use active travel rather than drive private cars. The policy should refer to the [Cycle infrastructure design \(LTN 1/20\) \(Guidance for local authorities on designing high-quality, safe cycle infrastructure\) for the required standard of this infrastructure](#). We provide detailed representations on the issue of walking and cycling infrastructure in **Appendix 1**.
- (l) See our response to (k) above which also covers our response to this point (l).

Policy Paragraph 4

4.17. This paragraph effectively provides a clause for allowing 'piecemeal development of individual sites' as long as they conform to the above requirements of the policy. We consider this is unjustified and consider that the wording "that do not conform to the above requirements" is deleted from the policy. This will help deter and prevent piecemeal development coming forward which is a considerable risk for this strategic allocation and has been a key risk identified throughout the hearings.

Policy Paragraph 5

4.18. Applications should of course be informed by LVIA's biodiversity and heritage studies. The removal of 'where necessary' should be deleted from the is policy. It is unclear why the Council has only included the requirement of these studies and not others from this list? There are many more studies that are required for applications including detailed flood risk studies and flood risk strategies, drainage strategies, transport assessments and transport plans. We would like to see a more comprehensive list provided rather than just three types of studies.

Policy Paragraph 6

4.19. We support Paragraph 6 requiring that all proposals will need to be assessed by a Design Review Panel at the pre-application and full application stages. A clear process for the Design Review Panel should be set out in the Local Plan along with a definition for what a DRP is for all readers of the plan to have clarity on this matter. Presumably the DRP will be independent to the TWBC?

Masterplanning

4.20. We address each paragraph in turn below.

Policy Paragraph 7

4.21. The wording of this policy is not effective. Firstly, it refers again to all proposals in relation to Eastern and Western parcels. Does this infer that the Northern parcel and the Town Centre parcel are not required to have masterplans?

4.22. What is the process the Council is proposing for 'approving' masterplans? Will there be public consultation? Will these be Supplementary Planning Documents (SPDs)?

4.23. It states that proposals will need to respect the requirements of paras. 2 to 6. This wording sounds optional and needs to be strengthened to state that proposals **must meet / shall meet** the requirements of paras 2 to 6. In addition, this should state that proposals must meet / shall meet the overall requirements of this strategic policy as well as the other policies of the Local Plan as a whole.

4.24. By stating that the masterplan shall be submitted to the Council for its approval as part of its 'initial application for planning permission' it is unclear what this is referring

to. Is this the pre-application stage or the outline application stage? It is important that PWTC and other key stakeholders are consulted on these masterplans. If they are simply submitted as part of the pre-application process, then they would not be available for public comment.

4.25. Again, this part of the policy appears to be encouraging piecemeal development by stating that the masterplan should be submitted “in relation to (any part of) the relevant Parcel”. We expressed our concerns with such an approach above and reiterate it here.

Policy Paragraph 8

4.26. Paragraph 8 states that the masterplans shall meet the requirements of clauses (a) – (j). We address each below. We note that there is no mention of **flood risk mitigation** or **drainage strategies** required as part of the masterplanning which are clearly critical and need to be added. There is also no reference to the **utility infrastructure** that needs to be delivered which is clearly important in the masterplanning. This needs to include **wastewater infrastructure** for example – where is this being delivered as an upgrade or new facilities?

(a) This requires that each masterplan shows the *“functional links with neighbouring Parcels, the existing community of Paddock Wood and Paddock Wood Town Centre and surrounding land”*. It is not clear what is meant by ‘functional links’ if this means that it needs to show the infrastructure being delivered to link the parcel to other parcels, the existing settlement, the town centre and the countryside then it needs to say this to be effective. We are concerned with referring it simply to ‘functional links’ as this could be left open to interpretation. For example, it should show the proposed cycling, walking, public transport and road infrastructure that it is delivering. This should not stop at the edge of the parcel and should show how it ‘functionally’ links to the Town Centre, to the Railway Station, to the Schools, to the Sports Facilities etc and should not be an arrow pointing towards these facilities but with no actual functional link fully proposed.

(b) This requires that the Masterplan *“demonstrate how heritage assets and their settings will be sympathetically integrated into the development and their significance respected”*. However, this appears to be a ‘light touch’ approach to heritage even compared to Policy EN 4 (Historic Environment) and Policy EN5 (Heritage Assets) in the draft Local Plan which are more robust and should be referred to here instead of the existing proposed text. It is unclear where ‘sympathetically integrated into the development’ wording comes from however it is not used in the NPPF and does not appear to be appropriate here. The Paddock Wood Neighbourhood Plan has a section on heritage which should be referred to here.

(c) The proposals should demonstrate that it is possible to retain existing hedgerows and trees particularly where they are co-located with Flood Zones 2 and 3.

- (d) We consider that habitats surveys should be undertaken regularly and at varied intervals to ensure a clear picture of local wildlife and habitats is available regularly. Otherwise, there will be a 'one off snapshot' in time which is not adequate.

- (e) This clause refers to the need to *"show how the development will incorporate the full range of sustainable transport measures, including the proposed access and highway and transport link, including links within the site and to the surrounding footpath and cycleway and bridleway network (including proposed and potential footpath and cycleway and bridleway links to the wider area wherever possible)"*. The David Lock masterplanning (and Structure Plan) and the Policies Map do not show how the new developments will actually link with the Town Centre, the Railway Station Education or Sports Facilities and this needs to be added so that it is clear what the overall sustainable transport measures are for the existing settlement and how these link to the new development. Otherwise, there is no clear overall sustainable transport plan for Paddock Wood with each developer of each parcel working in isolation.

- (f) –

- (g) See our responses to clauses a and e above. It is not just Paddock Wood Town Centre and the surrounding areas that need to be listed here. There is a need to demonstrate how the routes will integrate the new development with the Railway Station, Schools and Sports Facilities as well.

- (h) The Town Council does have concerns regarding many small health facilities being proposed given that they can become difficult to operate, staff and at the same time provide a limited range of services.

- (i) -

- (j) Compensatory improvements to the Green Belt are a key measure that needs to be better explained and what it might mean for Paddock Wood. How has this been costed in the Viability Study and where is it set out in the IDP?

Policy Paragraph 9

4.27. This states that the Northern Parcel only needs to comply with paragraph 8 (a) to (g) and appears little thought has actually gone into what the requirements of the Northern Parcel are which is further evidenced by section E on page 17 which simply states its requirements as:

"a mix of employment uses on sites to the east of Transfesa Road to provide approximately 4.25 hectares of Class E (g), B2 and B8 employment uses."

4.28. There should be more said about the type of employment intended for this parcel. There is a real risk that there will not be enough employment diversity located here and will focus too heavily on B2 and B8 without enough office space to meet the diverse needs of the existing and future community.

4.29. However, more should be added including:

- Flood risk mitigation measures

Wastewater treatment works and how these are being upgraded in their current location (and land needed for expansion) within this parcel (if this is indeed the case)

Crossings over the railway line

Opportunities for enhanced car and cycle parking on the northern side of the railway line

Policy Paragraph 10

4.30. Despite this paragraph requiring a phasing and implementation plan as part of each masterplan for the Eastern and Western Parcels (no mention here of the Northern Parcel or Town Centre), there is no overarching phasing and implementation plan for the whole of the proposed strategic allocation. It simply refers to Table 11 of the Council's Strategic Sites and Masterplanning Infrastructure Study (including Structure Plan) dated October 2023. Firstly, there is no Table 11 in this study. The final Table in the study is Table 8 (Infrastructure Schedule). This Table is outdated prepared a year prior to this current consultation and prior to the preparation of the updated IDP and Viability Study. Furthermore, the Table in the Strategic Sites and Masterplanning Infrastructure Study is very simplistic and not robust evidence on which the phasing and implementation of the development parcels can rely. We have set out our response and issues with that document in detail in our previous submissions and do not need to repeat them here. Surely the Council should be relying on its IDP for phasing and implantation across the area if that document is reliable and robust? Paddock Wood residents have lived with lack of a phased plan over the last 5 years. Without this plan, development in four or more areas around the town will create difficulties the community has experiences over recent years such as frequent road closures, excessive numbers of lorries blocking roads and waiting to get on site, excessive noise levels & lack of enforcement in relation to transport management plans etc.

4.31. We note that this paragraph states at 1) that the masterplans need to *“support the development and occupation of each Parcel and its proper integration with neighbouring Parcels”*. We are not entirely clear on what is meant by this however it should refer to integration with the existing settlement not just neighbouring parcels.

Policy Paragraph 11

4.32. Please see our comments on para 7 above.

Strategic Infrastructure

Policy Paragraph 12

4.33. This paragraph explains that infrastructure shall be secured by conditions and/or s.106 obligations to ensure clauses a) through d).

- a) It is difficult to understand how development across the whole allocation could be assessed as being capable of 'integrated and phased' and 'its impacts satisfactorily and mitigated' when the Council is likely to receive masterplans and applications for areas within parcels separately and at different times and there is not a clear phasing or implementation plan. Furthermore, it is not clear what the wording here actually means when it describes it as 'integrated and phased' and 'impacts satisfactorily and mitigated'?
- b) This explains that supporting facilities the Council considers to be required to allow the 'early establishment of a self-sufficient and cohesive community' yet it fails to include any sustainable transport infrastructure or active travel in its description. The delivery of sustainable transport and active travel infrastructure in the early stages of the development will be critical to ensuring that travel behaviour of new residents is positively facilitated. This should be added to this clause. We question what is meant by 'appropriate level of supporting infrastructure provision'? We also query what is meant by the 'early establishment of a self-sufficient and cohesive community'?
- c) This statement should be integrated into clause b) above.
- d) This states that transport and highways infrastructure should be provided when it is needed. However, it does not provide a description of what these infrastructure / improvements are or when they will be provided.

Policy Paragraph 13

4.34. PWTC welcomes the inclusion of the Town Council as a stakeholder regarding ongoing discussions on the delivery of necessary infrastructure. We consider that to make this effective that it should refer to the '**planning, design** and delivery of infrastructure'. The reason for this is that the planning and design stages of infrastructure provision are critically important to its successful delivery.

Policy Paragraph 14

4.35. We are confused by this paragraph and how it relates (or does not relate) to the earlier sections of the policy particularly paragraph 12 as they both appear to address Planning Obligations but in wording that is nuanced. This Paragraph includes a

reference to the IDP rather than the Infrastructure Schedule in the David Lock Study as referred to earlier. This needs to be clarified and simplified for the reader as it is quite unclear currently.

Policy Paragraph 15

4.36. This Paragraph states that the infrastructure to be funded shall include but may not be limited to the list in (a) to (f). We respond to each of these below:

(a) As we have stated earlier, this is simply not specific enough in terms of the location and type of sports and leisure provision that will be funded. This is even more confusing considering (f) which identifies *“the delivery of 4.54 ha of sport provision which is to be located straddling the south western and north western parcel boundaries and that this will be for sport and leisure provision including outdoor pitches, changing facilities and car parking”*. Furthermore, the reference to a 25m swimming pool ‘if feasible’ should be amended to state: **which shall include a 25m swimming pool.**

(b) What exactly is meant by ‘health provision’ this needs to be clarified what type of provision this is and in what form – will it be an extension of existing facilities or a new facility? What need is it meeting? It also states that health provision is to be provided in one or more of the local centres – why is this so vague when there is clearly a need for health provision to support the new developments? Multiple small health centres are not viable or cost effective and one larger centre would enable a wider range of services using a more cost effective model.

(c) Stating that an expansion of the existing secondary school at Mascalls Academy is what will be funded but including a clause for ‘in the event that the scheme is not deliverable’ that the fallback will be a new secondary school in the North-Western Parcel is an unsound approach. The deliverability of an expansion at Mascalls should already be determined, costed and committed to in the Local Plan rather than leave this matter to be dealt with through piecemeal planning applications. If TWBC wishes to include the fall back of a new secondary school, then it needs to demonstrate that this is viable and when it will be delivered. Therefore, both options need to be demonstrated that they can be funded and delivered for this part of the policy to remain. There is also the issue that parents would like a choice of secondary schools which is not being provided for in a one large school.

(d) As explained above, we consider that referring simply to ‘links to the existing settlement’ does not / will not facilitate the modal shift that is being relied upon for the Council to justify its lack of need for a Five Oak Green Bypass for example. Walking and cycling routes that meet the requirements of [Cycle infrastructure design \(LTN 1/20\)](#) will be required in the development parcels and in the existing settlement linking to key infrastructure. Furthermore, we note that there are multiple pedestrian and cycle crossings over the railway line in addition to a ‘north-south pedestrian and cycle

bridge...linking the North-Western and South-Western Parcels'. These are an improved crossing at the railway station and a walking and cycling route at the northeast of the South Eastern parcel. These should be referred to as well. (e) We question why the policy refers specifically to the Colts Hill Bypass and not to any of the other junction and highway improvements. These should be added for clarity and effectiveness. Whilst the Council's proposed approach for the Five Oak Green / B2017 works is to 'Monitor and Manage' surely there is also the need for this to be funded by the developers and to be listed here?

(f) As explained above this reference to the delivery of a 4.54ha sports provision (in one location straddling the south western and north western parcel boundaries) is confusing being separated from clause (a) above and should be included there. Furthermore, is this a reference to provision at Putlands or is this a new location being suggested by TWBC?

Policy Paragraph 16

4.37. This Paragraph provides a table setting out what the Council calls 'delivery parameters'. These are organised into Phases (Short, Medium, Long), Development (Cumulative Total of Homes) and Indicative Supporting Infrastructure.

4.38. In terms of Phases, what does TWBC define as short, medium and long term? Using the definitions in the IDP these are defined as below. We have added the trajectory assumptions from TWLP/153 to each of these terms for completeness. ***Please note that these totals do not add up with the Council's figures in this policy which total 2,450 dwellings.***

- Short term: five years and less (Years 2024/25 - 2028/29) = 540 dwellings
- Medium term: five to 10 years (Years 2029/30 – 2033/34) = 1,394 dwellings
- Long term: 10 plus years (Years 2034/35 – 2037/38) = 573 dwellings

Total: 2,508

4.39. It is unclear from the Policy what is meant by 'Indicative Supporting Infrastructure'. Most of the entries refer to 'Financial Contributions' towards the infrastructure indicated. However, there is no indication of when the infrastructure will actually be delivered. For example, we are told that financial contributions to facilitate the Colts Hill Improvements work are at some point between 2029 – 2034. This is when the contributions will be due(?) and when will development commence and be completed - this is entirely unclear from this table.

4.40. We suggest that the Phase column includes the plan period dates, the development column specifically deals with the development that will be **delivered** during that period of time and another column is added to this table with the indicative timetable for when contributions will be expected. What is also still unclear is what quantum of development is triggering each piece of infrastructure and for which Parcel.

- 4.41. We note that the employment development is missing from the table and needs to be included. With the increase in people in the town, there is a need for a wider mix of employment opportunities than currently provided. This includes occupations that are not just manual and retail.
- 4.42. As is currently drafted it is all very confusing and does not appear to provide a sound and robust basis on which to sustainably plan and deliver circa 2,500 new homes at Paddock Wood.

Policy Paragraph 17

- 4.43. Whilst Paragraph 17 refers to the potential need to regulate the occupation of development by requiring the completion / provision of infrastructure to optimise its sustainability. This needs to be made clearer what this means 'on the ground' in terms of the table in Paragraph 17 which we explain in terms of the 'trigger points' for infrastructure requirements based on the quantum of development.

Development Parcel Principle Uses and Development

- 4.44. We provide our comments in response to each of the requirements stated in the Policy for each Parcel.
- 4.45. Overall, this section is very confusing and unclear as what is being planned for each Parcel. How can one reconcile this section which one expects to give the full summary of everything that is planned (and expected to be delivered) parcel by parcel. However what we see is a very short list of what the policy describes as 'Principle Uses and Development'. This section of the policy requires further development and should be the 'go to' section to clarify all the things being planned in each of the parcels. The policy should not require the reader / user / decision taker to try to piece all the various pieces of the very long policy together as things are bound to get lost or misunderstood.
- 4.46. There is no section on the Town Centre which should clearly be an important part of the strategy for this policy and to the health of the settlement's future.
- 4.47. Again, we note that there is no mention of the delivery of required utilities including wastewater infrastructure which is concerning. We also note that the individual parcel requirements do not include any of the sustainable transport measures including public transport, walking or cycling infrastructure required to be delivered on each parcel.

Policy STR/SS 1(A) – North Western Parcel Requirements

- (i) -
- (ii) -
- (iii) Regarding the requirement for *“a three-pitch gypsy/traveller site (to include space for one mobile home and one touring caravan per pitch) to be accommodated on the North - Western parcel south of the railway line in accordance with policy H9”*

We have made comments regarding the most recent Gypsy and Traveller needs and responded to this particular location in our previous representations. We note that the 2023 'Structure Plan' now identifies an area to the west of the town south of the railway line as 'Gypsy & Traveller provision' and the 'Strategic Sites Masterplanning Addendum' now states the following: *"Policy also requires provision of a serviced Gypsy & Traveller site of 3 pitches. Location of this facility remains flexible within the Structure Plan, however an indicative location, pending detail studies on appropriate access, has been placed close to the A228 in the northwestern quadrant."* There is no further explanation given in this as to why the indicative location was selected or what happened to the previous proposed allocations in the Policies Map. The Council's Local Plan Development Strategy Topic Paper provides no explanation for this proposed location either even though it does now include this location below (in the Structure Plan) in its new Policy for the North Western Parcel. It is unclear what the justification is for this and the proposed policy is at odds with David Lock's report stating that the location remains flexible within the Structure Plan.

- (iv) We question how the local centre floorspace of 700sqm has been determined. The rest of the policy does not specify the amount of local centre floorspace that is to be provided for the whole of the allocation. This is the largest parcel, yet it has the same amount of local centre floorspace provision compared to the other parcels which are of a smaller order.

Why is the location of this local centre not known whereas the gypsy /traveller site is quite specific in terms of its location?

- (v) Regarding the safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required we have a number of important questions that need to be answered in the policy.

- Where is this safeguarded land located? The policy should be more specific than providing no information at all.
- How much land is to be safeguarded in total?
- What happens to the safeguarded land if the Council proceeds with its preferred option of expanding Mascalls School? This should be stated in the policy and the Town Council would like to input into this decision. Furthermore, as the delivery of a new secondary school would cost more than expanding Mascalls there is clearly some 'headroom' in terms of developer contributions that will be available if the Mascalls option is pursued. How does the Council intend to redistribute these excess contributions?

- (vi) This requires a Wetland Park within and to the north of the North-Western parcel to deliver flood water attenuation and new habitat, allowing for informal

recreation via a network of footpaths and boardwalks. We have a number of important questions that need to be answered in the policy:

- Where will this be located?
- How much land is being set aside?
- What are the flood water attenuation measures? Have they been tested and found to be appropriate through the testing?
- The South Western parcel requirements include the need for it to provide *“flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement”* yet this is not mentioned in this parcel policy section. How are they linked? There is an additional question relating to the very wet area north of this parcel that is in Tonbridge & Malling - is there any cross boundary working to ensure the flooding in this area does not cause a problem in the North Western parcel?

Policy STR/SS 1(B) – South Western parcel Requirements

(i) -

(ii) This requires a mix of housing to include sheltered accommodation provision in accordance with policy H6. Reviewing Policy H6 it is unclear what is being referred to when the policy states ‘sheltered accommodation’. What is the anticipated scale of this in the South Western parcel? As stated in our response to Paragraph 3(b) above, it left it open to *“at least one sheltered and one extra care housing scheme (one on the east and one on the west of the allocated site)”*. Yet in this section it identifies where one of the ‘sheltered’ schemes will be located - in the South Western parcel.

(iii) Please see our response to the local centre proposals to the North Western Parcel which also applies here.

(iv) This requires *“a flood water attenuation area allowing for informal recreation via footpaths and boardwalks”*. This is a very general statement without any details provided as to its location or size. What is its purpose for example – what kind of flooding is it going to mitigate. It seems the main purpose is for recreation via footpaths and boardwalks?

(v) This requires the *“provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement”*. This is very unclear what is meant by ‘flood attenuation features – this needs to be expressed in more detail. What is meant by enabling the delivery of flood betterment to the north western area of the settlement? What is meant by ‘enabling’, what is meant by ‘flood betterment’ and what is the area to the ‘north western area of the settlement’?

Policy STR/SS 1(C) – South Eastern Parcel Requirements

- (i) –
- (ii) Our response to Parcel B point (ii) is repeated here. This requires a mix of housing to include specialist extra care accommodation for the elderly in accordance with policy H6. Reviewing Policy H6 it is unclear what is being referred to when the policy states 'Extra Care or equivalent' under the same umbrella as 'sheltered accommodation'. What is the anticipated scale of this in the South Eastern parcel? As stated in our response to Paragraph 3(b) above, it left it open to *"at least one sheltered and one extra care housing scheme (one on the east and one on the west of the allocated site)"*. Yet in this section it identifies where one of the 'Extra Care' schemes will be located - in the South Eastern parcel.
- (iii) This requires safeguarding of land north of Chanters Hill for the expansion of Mascalls Academy if required. What is the reference to the requirement to safeguarding this land 'if required'. As we understand it, this is the Council's policy to expand Mascalls and therefore the land should be required to be safeguarded and not an option. The deliverability and viability of this safeguarding should also be evidenced in order for this overall policy to be considered sound. It is still unclear what will happen to the safeguarded land if the Mascall's extension is taken forward. This should set out in the policy.
- (iv) Please see our response to the local centre proposals to the North Western Parcel which also applies here.

Policy STR/SS 1(D) – North Eastern Parcel Requirements

As set out about our overall comments on these Parcel sections, the three requirements for a scheme of 600 dwellings seems very basic and it appears as if this is simply incomplete.

- (i) -
- (ii) This requires land for a two-form entry primary school. What is the size / amount of land required?
- (iii) This requires incorporation, use and enhancement of the Hop Pickers Trail. What exactly does this mean by 'incorporation'? Incorporated with what and where? What does 'enhancement' mean? From what we have seen the Hop Pickers Trail does not actually link properly into the Town Centre or the Railway Station.

Policy STR/SS 1(E) – Northern Parcel Requirements

- (i) This states that a mix of employment uses on sites to the east of Transfesa Road to provide approximately 4.25 hectares of Class E (g), B2 and B8 employment

uses. Please see our comments to Paragraph 9 which states that more should be added including:

- Flood risk mitigation measures

Wastewater treatment works and how these are being upgraded in their current location (and land needed for expansion) within this parcel (if this is indeed the case)

Crossings over the railway line

Opportunities for enhanced car and cycle parking on the northern side of the railway line

5. PS_096 Education - Atkins Realis Mascalls Academy Feasibility Study Review (June 2024)

5.1. The Feasibility Study 'Review' raises many issues with the potential for expanding Mascalls Academy and these are not addressed in the Council's documentation as far as we can see. The conclusion of the Review is:

"In overall, based on the information provided in the IDP feasibility study, is considered that the site has the potential to accommodate a 3FE expansion. The matters raised (subject to the information provided) are considered to be issues which can be resolved as the scheme progresses through relevant design stages."

5.2. Stating that there is the 'potential to accommodate a 3FE expansion' is not very conclusive and convincing. This is even less convincing when one reviews the points raised in the Review regarding its Architecture Review and Landscape Review:

Architecture Review

- The deficit in WC provision and additional provision required across the site.
- Opportunities to convert excessive Staff/Admin or Storage spaces for teaching or Learning Resources Area.
- Better understanding the school's curriculum needs.
- How subject suiting would change from the existing layout, through the construction phases to the new layout.
- How other ancillary spaces around refurbished area would be reconfigured to suit the new layout. e.g. Library, Art, Music, General Teaching classrooms in Block G, access to rooms, new internal connections within existing building etc.
- Review of 'suitability' of existing teaching spaces for opportunities to re-purpose existing under/oversized teaching spaces to more suitable teaching room size.

Landscape Review

The current proposal is to mitigate this shortfall with the installation of a new 400m polymeric running track and second All Weather Pitch located in the centre of the track. This does mitigate the loss but does create other challenges such as:

- Loss of existing grass provision to be used for other sports (i.e. cricket, rugby etc).
- Potential use of the facility by the community and this will be managed.
- Site security and access strategy when used by the community.

- Cost and management implications.
- Ecological implications including Biodiversity Net Gain (BNG).
- Agreement by Sport England as part of a wider Paddock Wood sporting strategy.
- The current access has limited site visibility lines and is on a relatively sharp bend with limited opportunities for improvement. This proposal as shown on the plans needs expert design advice from a transport / highways consultant to verify its feasibility.
- There has been no discussion of cycle parking increase within the report. This should be considered alongside wider paddock wood cycling strategy.
- The BB103 figures show the site has the potential to accommodate the increase, but some small discrepancies on allocation have been noted. Such as areas of 'soft informal and social area' being allocated as 'soft outdoor PE'
- A requirement for a successful planning submission will be an increase of 10% Biodiversity Net Gain (BNG). This has not been referenced within the report.
- The site has varied topography which may impact on the design solutions. Currently the report does not go into detail regarding any site level implications.
- There are several trees on site which are shown as requiring removal. Currently there is no reference to a tree survey or Arboricultural assessment.
- Large areas of the southern part of the site appear to be meadow land which typically can have high habitat value. It is noted in the report that an Ecologist should be consulted which is highly recommended to ensure any proposals fully consider ecological implications

5.3. Furthermore, there is no evidence which considers the merits of building a secondary school versus expanding Mascalls Academy or the option of a new secondary school /expansion outside of Paddock Wood. At the hearings we simply heard from the developers that yes, the expansion at Mascalls Academy is feasible and their preferred option. This is not surprising to hear as we can imagine the costs of expanding are cheaper than building a new secondary school. As we explain in response to the IDP the costs of each are not set out.

5.4. The Town Council concerns with the potential expansion of Mascalls Academy with one of its key concerns being the existing and proposed size of the school. The school

already has an enrolment of 1,450 students and adding additional form entries is going to overcrowd and over develop the property. As we have set out in our response to the 'walking and cycling infrastructure' the Town Council is concerned that there will not be safe routes to the secondary school at Mascalls leading to a requirement for families and students to drive. Furthermore, the fact that Mascalls is an Academy, and its facilities are private, there is a risk that any sports and recreation provision that is claimed to contribute to space available to the local community will have barriers to access in practice.

- 5.5. Another key issue for Mascalls Academy is that children come from a wide catchment area including Cranbrook, Staplehurst & Marden (Maidstone Borough), Wateringbury, Mereworth & East Peckham (Tonbridge & Malling). It is unclear from the Council's evidence how the sustainability of this proposed location for a secondary school has been tested – how will pupils from Paddock Wood and the surrounding area access the school sustainably given that it is not particularly well integrated into the scheme geographically. With growth in housing in these areas there will be increased pressure on Mascalls Academy in addition to that occurring just in Paddock Wood.

6. PS_097 Statement of Common Ground between TWBC and KCC Education

- 6.1. The SOCG is not just between TWBC and KCC Education as stated in the evidence base (Core Document List). It is a SOCG between Tunbridge Wells Borough Council, KCC Education Crest Nicholson, Persimmon Homes South East and Redrow Homes Limited.
- 6.2. There is a fundamental issue with the SOCG which is that the **Leigh Academies Trust is not a signatory to the SOCG**. This brings into question the robustness and reliability of the SOCG given that the key party involved has not agreed to the SOCG! The only evidence provided in terms of the Trust's involvement is a letter from the Estates Director for the Trust to the developer's planning consultant (Appendix 3 of the SOCG). We query why there is not a letter from the Trust to TWBC and KCC. The letter itself is brief. It states that it agreed in principle with the 'high-level plan' for Mascalls Academy's future development. This is not a convincing statement.
- 6.3. The letter includes a section on 'Community Use Agreement and Positive Impact on Sports Offer' stating that:

"Mascalls Academy already boasts a strong relationship with the local community, with residents actively utilising the academy's facilities. We believe the proposed expansion plans will further enhance the existing sports facilities and offerings, bringing positive benefits to the wider community. Community groups and sports clubs are able to access the facilities outside of academy hours in evenings, weekends and during school holidays. Any additional sporting facilities delivered as part of this scheme will be made available as per the existing arrangements".
- 6.4. This statement does not reflect the Town Council's experience of the local community being able to access the academy's facilities.

7. PS_098 Action Note on Action Point 28-LP Sequential Test re Strategic Allocation Policy STRSS1 (09_24)

- 7.1. As the Town Council has set out since 2021, a Sequential Test was never undertaken by TWBC. What further evidence is required than the Inspector's Initial Findings which concludes that the Sequential Test is an 'absolute test' (paragraph 50). When the Council finally took onboard the NPPF requirements on flood risk (removing development from Flood Zones 2 and 3) it wound up with circa 1,000 fewer homes.
- 7.2. Despite this, there is still the matter of the requirement for the Sequential Test needing to be applied borough-wide which clearly was not undertaken.
- 7.3. As the Inspector states at paragraph 48, *"national planning policy is clear that development should not be allocated or permitted if there are reasonably available sites appropriate for the development at a lower risk of flooding. The PPG advises that avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features"*. The strategic proposals at Paddock Wood and east Capel are proposed in the Local Plan as one strategic site and it is unclear from the Council how other sites in the Borough were sieved out so that its only choice in flood risk terms was to select Paddock Wood – the area with the highest flood risk in the Borough. Is TWBC not contradicting PPG by placing heavy reliance on measures like flood defences and property level resilience features to justify its proposed allocation at Paddock Wood and east Capel? Without such features, even the removal of residential development from Zones 2 and 3 is not sound as the flood risk within the allocation is still present and requires full and proper mitigation.
- 7.4. In PS_098 (paragraph 3.43) the Council states the following:
- "The Council notes that when formulating its response to the Inspector's initial findings, it did give consideration to whether there were other suitable sites that could be allocated, and as has been discussed elsewhere in the Stage 3 hearing statements, consideration was given to whether there were reasonable alternative Green Belt sites suitable for development as a consequence of the findings of the additional Stage 3 Green Belt assessment of reasonable alternative sites, and subsequent consideration of these through the SHELAA process. The Council found and concluded that there are no more deliverable sites available for allocation at this time."*
- 7.5. As we have set out in our previous representations this is simply a statement by the Council that there are no more deliverable sites available, yet it is not possible to query this assessment of Green Belt sites with a 'policy off' approach to what Green Belt sites may have been sequentially preferable to Paddock Wood.

7.6. The final words of the paragraph above “at this time” point to the fact that there will be more sequentially preferable deliverable sites available for allocation in the future. As we have raised previously, any Local Plan Review whereby more sequentially preferable sites are identified (which were also available at the time of this Local Plan Examination) will reveal that a sequential test was never properly undertaken.

8. Highways Evidence

- PS_099 Introductory Note to Highway Modelling Reports (September 2024)
- PS_100 Modal Shift Analysis Technical Note (April 2024)
- PS_101 A264 Pembury Road corridor – Junction capacity assessment (June 2024)
- PS_102 Junction Hotspot Comparison (June 2024)
- PS_103 Strategic Transport Assessment – Modelling Appraisal April 2024
- PS_104 Strategic Transport Assessment Addendum June 2024

8.1. The Town Council has made multiple representations to the transportation evidence in its previous submissions and wishes to rely on these for this consultation. These previous submissions include the following responses to the Stage 3 Hearing sessions. We provide responses to a number of the other new pieces of evidence which relate to these studies listed above including the new IDP.

Stage 3 Hearings

Matter 4 – The Strategy for Paddock Wood

Issue 4 – Highways Infrastructure

Question 1: *What effect would the suggested deletion of the Five Oak Green Bypass have on the distribution of traffic across the highway network? Does the growth around Paddock Wood require additional highways mitigation not previously identified?*

Question 2: *Is the Colts Hill Bypass required as a result of the growth proposed around Paddock Wood? How will it be funded and delivered?*

Matter 7 – Highways Infrastructure

Issue 1 – Strategic and Local Road Networks

Question 1: *Without the proposed bypass, what effect will the suggested changes to the Plan have on the B0217 through Five Oak Green? What mitigation measures will be necessary in this location and how will they be achieved?*

Question 2: *What effect will the suggested changes to the Plan have at Kippings Cross (A21/B2160)? Do the conclusions and recommendations in the Kippings Cross Junction – Local Plan Mitigation Option Analysis remain relevant?*

Question 3: *What effect will the proposed changes to the Plan and distribution of growth have on the remaining “hotspots” identified in the evidence base? Will there be any unacceptable impacts on highway safety or will the residual cumulative impacts on the road network be severe as a result of the Plan?*

Question 4: *Where mitigation is required, can any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?*

Issue 2 – Policy Requirements

Question 1: *Where mitigation is required, is the Plan sufficiently clear what is required, where and when? Is the Plan effective in this regard?*

Question 2: *Have the costs associated with the necessary highways infrastructure been tested and will it be viable?*

9. PS_105 TWBC Final Infrastructure Delivery Plan (IDP) (August 2024)

General Comments

- 9.1. The Town Council made extensive representations to the IDP that was previously published in 2021 (3.71 and 3.142). Despite the clear need for an updated IDP to support the Local Plan this was never provided until this current consultation which is very much the 'final hour' of the Examination. This approach has wasted a considerable amount of time at hearings and left little opportunity for participants to respond to the contents of the IDP which is clearly a critical document for determining the deliverability of the Local Plan and proposals at Paddock Wood and East Capel.
- 9.2. Compensatory improvements to the Green Belt are a key measure that needs to be included in the IDP.
- 9.3. The IDP states at Paragraph 1.1 that the *"Details of engagement with infrastructure providers and key stakeholders in determining the level of infrastructure required to support new developments"*. The details are set out in Appendix 3. Yet the engagement details provided is dated 2016 – 2020 despite this version of the IDP being published in August 2024. Surely this engagement is now outdated and should raise serious concerns as to what engagement with key stakeholders providers has taken place since 2020. The Town Council has not been engaged regarding the infrastructure in and around Paddock Wood for a considerable time.
- 9.4. It states at Paragraph 1.3 that: *"This IDP should also be read in conjunction with Paddock Wood Infrastructure Framework 2024, which has been prepared in relation to the strategic extension of the settlement of Paddock Wood as well as land in east Capel Following receipt of the Inspectors Initial findings letter"*. We are not aware of an Infrastructure Framework dated 2024 – please can TWBC provide this with the participants of the Examination so that we are looking at the same document?
- 9.5. The IDP makes no reference to the Housing Trajectory which there needs to be a clear read across between the IDP and the Trajectory and what infrastructure trigger points there are in the housing trajectory. For example, 'X infrastructure is required to be operational by the delivery X dwellings'. Without this clear relationship between the IDP and Housing Trajectory its robustness is seriously questioned and given the importance of the IDP to justify the Local Plan's deliverability it brings into question the overall soundness of the Local Plan itself.
- 9.6. The purpose of the IDP explained in the following bullet points by TWBC. As explained above this lacks any consideration of how the proposed growth actually relates to the timing of infrastructure needs. The 'Timing' method of the IDP considers infrastructure simply in 5 year tranches and there are no details provided within these tranches and these do not relate to the housing trajectory.

- Summary of existing infrastructure, details of any planned infrastructure and what new infrastructure is required to support the growth proposed;
- How the infrastructure will be provided;
- Who is to provide the infrastructure;
- How the infrastructure will be funded;
- When the infrastructure will be provided.

Prioritisation of infrastructure

9.7. Central to TWBC's categorisation of infrastructure priorities is their assessment of "what must happen to enable physical development to take place". Infrastructure is also 'physical development' so this statement is not particularly clear, but our point is that for 'critical infrastructure' certain pieces of infrastructure are necessary to 'unlock' a certain scale of development otherwise there will be a delay to the delivery of development. However, the IDP is not explicit about the timing of infrastructure delivery required for development to even 'commence' let alone the 'completion' of development.

Identified Risks

9.8. Paragraph 2.34 of the IDP states that it identifies the risk to delivery of each infrastructure item and (in bold) that it **"focuses on the risk that the infrastructure will not be delivered, not the wider risk to the Local Plan if infrastructure doesn't take place"**. This statement reads like TWBC is attempting to protect itself from the fact that there is indeed risk of non or delayed infrastructure delivery that could jeopardise the Local Plan, its policies and overall development strategy. The various infrastructure delivery risks should be considered accumulatively rather than just individually as this is what the experience of local communities will be on the ground and is not simply a paper based exercise.

9.9. For an infrastructure to have 'high' there need to be fundamental constraints to its delivery with examples given of 'no clear funding stream', 'no site identified' and /or 'land/site assembly issues'. However, this sounds like it is more linked to the overall scheme and not just the infrastructure. The IDP and its Infrastructure Delivery Schedule (IDS) contain many blank sections including sections with unstated 'funding streams'. However, these are not given any 'risk' attached to them.

9.10. We also question how can large items of infrastructure where the costs are 'TBC' can be given anything but a 'high' risk? If the costs are unknown and have not been assessed in the viability report, then this would appear to be a high delivery risk.

9.11. The definition of 'Moderate' risk is that *"some constraints or uncertainty attached to the delivery of the scheme"*. No examples are provided of what this means – surely any infrastructure project could be classified as having some constraints or uncertainty.

9.12. In terms of the definition of 'Low' risk it states that there is a *"strong certainty of delivery, e.g. costs identified, funding in place, political and community support"*. We

challenge how 'funding in place' and 'political and community support' have been used to assess the items of infrastructure in the IDP. When TWBC says funding is in place for example in Paddock Wood, funding is not actually in place when it is relying on developer contributions if we understand that correctly? Also how is 'political and community support' being assessed by Officers? Are we to understand it correctly that any time there is a 'low risk' there is strong support from the community? And when it refers to 'political support' at which level of support is this coming from – the Borough Council, County Council, Town and Parish Councils? This is entirely unclear, and we are concerned how this has been applied to the infrastructure identified in and around Paddock Wood.

9.13. Overall, the methodology for assessing the risk of infrastructure delivery is unsound as set out above.

Timing

9.14. The IDP states at Paragraph 2.36 that *"The timing of delivery of infrastructure schemes is dependent upon a number of key factors, including when development comes forward, the point at which an infrastructure project is actually required, and the timing of funding being made available. Given this complexity, the IDP breaks down the timescale for delivery into three tranches:*

- *Short term - five years and less;*
- *Medium term - five to 10 years;*
- *Long term - 10 plus years."*

9.15. This statement encapsulates the very issue we have raised repeatedly, it says one of the key factors for the timing of delivery of infrastructure schemes is when development comes forward, when infrastructure is required and the timing of funding being available. The IDP effectively says this is all too complex here are three very broad timescales / tranches that we are going to lump each item of infrastructure. This basic approach to the complexity of timing, funding and delivery does not take the Local Plan any further in terms of TWBC demonstrating that the development strategy at Paddock Wood is deliverable.

9.16. Furthermore, the latest 'Start to Finish' report³ concludes that for schemes of 2,000+ dwellings the mean years from validation of the first planning application to the first dwelling being completed is 6.6 years.

Costs

9.17. This section explains at Paragraph 2.38 that *"it is often difficult to be certain about infrastructure requirements so far into the future, as the detail of many development*

³ Start to Finish How quickly do housing sites deliver? Third Edition (September 2024) Lichfields

schemes is currently not known”. However, the plan period of the Local Plan is about as short as one can get. It is for a maximum of 14 years and over 75% of the development proposed for Paddock Wood and East Capel is expected to be delivered within the next 10 year period according to the latest Housing Trajectory. Therefore, it is not accurate to state that it is difficult to determine the infrastructure requirements ‘so far into the future’. After all the point of the IDP is to determine the infrastructure requirements and if TWBC is uncertain about what is required, its costs or whether it can be delivered then the IDP should be clearer about this.

9.18. We have raised a number of times throughout the examination the need to understand how infrastructure costs have been calculated and verified by an independent cost consultant or at the very least explain how the costs have been arrived at. We are not aware of this critical evidence base ever having been provided.

Infrastructure Delivery Schedule (IDS)

9.19. We comment on the IDS with cross references to the ‘Infrastructure Theme’ section that precedes the IDS.

Borough Wide and Cross Boundary

9.20. For Paddock Wood and the Strategic Sites is not possible to ascertain the difference between many of the ‘Borough Wide and Cross Boundary’ entries and the entries specifically for Paddock Wood Strategic Sites. Naturally, we question how these items have been accounted for the Viability Study.

9.21. It is unclear which developers are responsible for the funding of infrastructure. By this we mean, are developers in other local authority areas also contributing to these pieces of infrastructure? And for those developers that are in TWBC District, which developers are responsible for making contributions?

9.22. There is an entry for ‘Travel Planning across the borough including Strategic Sites’ with an indicative cost of circa £3.2m. It is unclear how this funding is divided across the Strategic Sites and particularly for Paddock Wood.

Transport	Travel Planning across the borough including Strategic Sites	Essential	Low	Short/Medium	KCC/TWBC	£1,606,500 £1,260,000 £400,000	Developer funding
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9.23. Regarding **Colts Hill Bypass**, this should be included in the Borough Wide Infrastructure section and not in the Paddock Wood Strategic Sites section due to the fact that the Colts Hill Bypass is not benefiting Paddock Wood and is instead benefiting Colts Hill and the other areas of the Borough in the south. The developers at Paddock Wood should not be solely responsible for the funding of this very expensive piece of infrastructure.

9.24. Under the heading of ‘**Buses**’ on pages 126 – 127, there a number of entries indicated for Paddock Wood including:

- 'Improved bus (Service 205) between Paddock Wood – Tudeley – Tonbridge'
- 'Improved bus (Service 6) between Tunbridge Wells – Pembury – Paddock Wood'.

Neither of these entries have a cost estimate yet in the 'Funding Position' column they each say "Developer funding*/Commercial services *£4million new bus route subsidy support funding identified in Strategic Sites Masterplanning and Infrastructure Study". This is a total of **£8m** of funding as claimed by the Study yet there is no actual estimate for what it might cost.

- 9.25. Under '**Pedestrians and Cyclists**' the majority of entries are indicated as 'Highly Desirable'. Given that the strategy for the Local Plan and Paddock Wood is reliant on a large modal shift these projects should be 'critical' otherwise these modal shifts will not be achieved.
- 9.26. We note that the 'Upgrade Hop Pickers Line for cycling and walking' has no estimate despite this being a key sustainable link required in Paddock Wood.

Paddock Wood and East Capel *Transport – Walking and Cycling*

- 9.27. Under 'Transport (walking and cycling)' it identifies LCWIP Phase 2 cycling and pedestrian within Paddock Wood (existing) and low traffic neighbourhoods. We seriously question why these routes within the existing town are not included in the Strategic Sites and Masterplanning document given that they are critical to the sustainability of the developments and to give any hope to achieve a modal shift as assumed by the Council's own evidence base. It is unclear how the existing road infrastructure will be modified to create the type of cycle infrastructure that will encourage people to cycle rather than take their personal cars.
- 9.28. The IDP does not refer to the Government's [Cycle infrastructure design \(LTN 1/20\) \(Guidance for local authorities on designing high-quality, safe cycle infrastructure\)](#) or state requirement for the cycling infrastructure to follow Government guidance and it should. Furthermore, the IDP should specify how existing roads will be adapted to accommodate cycle infrastructure.
- 9.29. We highlight many fundamental issues with the inferred 'cycling strategy' in the Strategic Sites Masterplanning and LCWIP documents in **Appendix 1**.
- 9.30. It states that the **£4.05m** costs are to be developer funded and we would like clarity as to the amount of funding is assumed to come from the Strategic Site developers and how much is being secured by DfT. This amount of funding is not adequate.

Transport (walking and cycling)	LCWIP Phase 2 cycling and pedestrian within existing Paddock Wood town and low traffic neighbourhood network within existing Paddock Wood town	Essential	Low	Short/ Medium	KCC/TWBC	£4.05 million	Developer funding/DfT Cycling & Walking funding
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9.31. The next entry is for ‘Pedestrian and cycle improvements (Stantec assumed upgrades and PJA presentation route)’ which is set to be delivered in the short term with a cost of **£4.7m** yet it does not say its prioritisation, who will fund it or who will deliver it?

Paddock Wood Infrastructure Framework 2024	Pedestrian and cycle improvements (Stantec assumed upgrades and PJA presentation routes)			Short		£4,657,500	
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9.32. The next entry is for ‘Pedestrian and cycle improvements (Stantec assumed upgrades and PJA presentation route)’ which is set to be delivered in the short term with a cost of **£4.7m** yet it does not say its prioritisation, who will fund it or who will deliver it?

9.33. There are many other entries in this section on ‘walking cycling’ that are left blank in many of the categories which gives a concerningly incomplete picture of the deliverability for walking and cycling infrastructure in Paddock Wood and the proposed allocations.

Transport – Bus

9.34. The IDS for ‘Bus Transport’ is incoherent and not possible to make any sense of what the delivery strategy is for bus infrastructure. The ‘priority’ assessment for the various entries range widely including being ‘Highly Desirable’ for a demand responsive bus in the Paddock Wood Masterplan area, yet is indicated as having developer funding of £3m in the Masterplanning Study. It is planned for delivery in the short/medium/long term

9.35. The next entry is for PW East: Internal primary street with no prioritisation identified at all which could be delivered in the short/medium/long term.

A ‘Shuttle signal bridge over railway at Paddock Wood’ is only assessed as being ‘highly desirable’ and appears to be quite low cost of £575k for delivering a new bridge assuming this is what is meant? This is quite a critical piece of infrastructure to enable bus transport over the railway line in the short term.

Transport – Highways

9.36. The A228 Colts Hill / Badsell Road roundabout improvements are presumably referring to the full **Colts Hill Bypass and roundabout improvements**. The full cost indicated in the IDS is circa **£23.4m**. It says this is developer funded and KCC S106 funding to date.

Yet there is no breakdown of what is the KCC S106 funding and what is required from developers. As stated already, these proposals will not benefit Paddock Wood and the costs should be shared with developers in other areas which will benefit from this infrastructure. This will free up more obligation monies for infrastructure that will benefit Paddock Wood. This is ‘critical’ infrastructure and stated as being delivered in the medium term (between 5-10 years) which is likely to be challenging given the environmental sensitivity of the area as we have set out previously.

9.37. The remainder of the Highways section has a lot of missing information particularly for the Somerhill roundabout improvements and A267/B2169 Birling Road. It is unclear what the ‘Traffic management / speed reduction measures in Five Oak Green village’ involve and it is surprising to read this is ‘highly desirable / essential’ and not more of a priority given the traffic impacts that the village will be facing based on the Council’s evidence base.

Paddock Wood Infrastructure Framework 2024	Improved A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout	Critical	Low/Moderate	Short	KCC/TWBC	£1,149,999	Developer funding
	Somerhill roundabout improvements B2017/A26					£1,000,000	
	A267/B2169 Birling Road					£500,000	
	Traffic management/speed reduction measures in Five Oak Green village	Highly desirable/essential	Low	Medium	KCC/TWBC	£230,000	Developer funding

9.38. Further to our point regarding the ‘Borough Wide’ Travel Plan contribution which indicated Paddock Wood, there is what appears to be an additional Travel Plan contribution just for Paddock Wood for £1.14m from developer funding yet it is not prioritised, does not show a risk and does not say who is responsible for its delivery.

Travel Plan Paddock Wood Infrastructure Framework 2024	Travel Plan contribution			Short/medium/long		£1,139,400	Developer funding
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Education – Primary

9.39. We note there is reference in the IDP to the KCC Growth and Infrastructure Framework (2018) which is not out of date.

9.40. We question why there are two primary schools needed in addition to the one agreed for the Persimmon site - surely the cost & effectiveness of providing three small primary schools are not the best solution. One larger primary school in the west would be better, would enable better staffing, reduced management costs & greater flexibility of provision.

9.41. The IDS indicates the cost of two new 2FE primary schools as **£17.76m** yet does not breakdown the costs between KCC and the developers.

Education – Secondary

- 9.42. Despite the revised Policy STR/SS1 stating the following about secondary education infrastructure, the IDS indicates 4FE towards a new secondary school (on site). *“Financial contributions for staged improvements to Mascalls to provide 3FE expansion or transfer of land for 6FE secondary on parcel A (which could be operational from 4FE) and associated contributions to KCC to deliver.”*
- 9.43. The IDS appears to conflict with the revised STR/SS1 Policy and it is unclear what is actually being costed in the IDS and what the cost of the Mascalls expansion is and what the cost of a new secondary school is. Further, it is unclear what proportion is to be funded by the developers and which is funded by KCC.

Education (secondary)- Paddock Wood Infrastructure Framework 2024	4FE contribution towards new secondary school (on site)	Essential	Moderate	Medium	KCC	£18,360,814 approximate	KCC/Developer funding (IL/S106)
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Water – Wastewater

- 9.44. The IDP explains (Paragraph 3.146) that wastewater treatment capacity is currently limited at Paddock Wood and the levels of development proposed exceed the current catchment forecast. It explains that 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.
- 9.45. This issue is clearly not resolved as the IDP states that the 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.
- 9.46. The IDP states that land has been safeguarded for an extension to the existing sewage treatment works in Paddock Wood. As the Town Council understands it this land claimed to be ‘safeguarded’ has been sold to another party and is therefore no longer available for claimed expansion.
- 9.47. The IDP concludes this issue by stating that *“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. 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.”*

9.48. This is a ‘showstopper’ issue for growth at Paddock Wood and East Capel as the wastewater treatment plant does not have existing capacity let alone the capacity for an additional 6,000 residents. This has not been full considered in terms of the phasing of growth or the housing trajectory.

9.49. On the matter of wastewater infrastructure, the IDS lacks certainly stating that additional wastewater capacity required is yet to be determined and refers to the safeguarded land for future expansion which we understand is no longer available.

9.50. If it is true that the additional wastewater capacity required is not yet known how can it provide an estimate of the costs? It identifies a total cost of £230k to upgrade the works. This seems extremely low and does not consider the very real potential requirement of the need for a new wastewater treatment works facility which would obviously be a lot more costly. Furthermore, where is the cost of the ‘safeguarded land’ been factored into the IDP and Viability Study as it does not appear anywhere and is certainly a key factor.

Water (waste water)- Paddock Wood Infrastructure Framework 2024	Additional waste water treatment capacity required over the Plan Period to be determined Safeguarding of land around the existing wastewater treatment works at Paddock	Critical	Moderate	Medium/long Short/medium/long Short	Southern Water	£230,000 for sewer works upgrade £172,500 foul water connections £114,999 diversion of existing	Southern Water: capital investment
	Wood for future expansion works					utilities foul water Mostly will be funded through customer rates	

Water – Flood Risk

9.51. The Flood Risk section of the IDS has worryingly little costing included for a strategic growth area that has considerable existing and future flooding issues to mitigate against. It is quite clear that TWBC and the developers do not have a coherent plan for mitigating flooding in the area.

9.52. The IDP explains at Paragraphs 3.155(a) – 3.159: that there is a Paddock Wood Flood Alleviation Scheme due to it being at risk from both fluvial and pluvial flooding when the amount of rainfall is too much for the watercourses and sewers to discharge quickly enough, and as a result of this a number of incidents have been reported across the Paddock Wood area over recent years.

- 9.53. The IDP sets out that KCC appointed consultants carried out a hydraulic modelling study to assess a series of options to mitigate flooding in Paddock Wood with a number of mitigation options identified demonstrating that storage on the three main ordinary watercourse systems, Tudeley Brook/Gravelly Ways, Paddock Wood Stream and Rhoden Streams, has a flood risk benefit to Paddock Wood. TWBC then explains that this study has effectively been superseded by the updated modelling carried out for the Tunbridge Wells borough Strategic Flood Risk Assessment produced as part of the Local Plan evidence. **Therefore, it is unclear where this leaves the status of this evidence base for flood risk and mitigation.**
- 9.54. The IDP states that *“there are a number of smaller flood mitigation projects that are committed through consented planning permissions, particularly in relation to development proposed at Paddock Wood”* however it provides no details of these projects or how they might link with any new proposed flood mitigation measures for the strategic development planned at Paddock Wood.
- 9.55. The IDP (Paragraph 3.158) sets out what TWBC considers, based on the SFRA ‘and further modelling work’ to be the **‘Additional future requirements needed to deliver growth proposed in the Local Plan’**. TWBC claims that flood risk can be managed by on site mitigation. There is no further information or explanation about this in the IDP.
- 9.56. The IDP appears to rely pretty much entirely on the ‘Structure Plan with supports the Masterplanning’ to conclude that *“potential surface water flooding can be managed through the integration of green infrastructure and open space as well as the provision of land for SuDS”*. However, the Structure Plan is simply an indicative drawing which does not clarify how the mitigation measures will be implemented - it indicates some areas where SuDS could be placed. The IDP states other measures will be implemented including the following (with our comments next to each). We cross reference this with the IDS. As an overall comment there is no breakdown of the costs of these mitigation measures, the IDS simply gives two costs: Groundworks (£2.87m) and SuDS (£850k) this seems like a very low estimate for what are significant measures and infrastructure. Furthermore, the IDS does not include the ‘wetland park’ which has presumably not been included in the costs?
- Raised platforms of approximately 1m are required for around 11ha of development on the western side of Paddock Wood (land in Capel Parish), to ensure floodwaters remain outside of residential areas and to ensure betterment for Paddock Wood. **It is unclear is what meant by ‘raised platforms’.** **Where is the 11ha area which requires this mitigation, this should be shown on the map. How much will this cost?**
 - Targeted flood embankments are proposed to the north-east of the south-western parcel, protecting existing urban areas and the town. **Where are these planned? What will their height be in order to protect existing urban areas and the town?**

- Potential to provide a county-level ‘wetland park’ on land to the north of Paddock Wood, which could be transformed into a natural space providing much-needed habitat and biodiversity improvements, based around water. **Again, it appears that this is not a ‘commitment’ but a ‘potential’ piece of important infrastructure. This project has been left out the IDS.**
- Movement across flood management areas is proposed by causeways with culverted channels underneath. These causeways provide vehicle, cycle and pedestrian walkways above any anticipated floodwaters. **This appears to be a costly piece of infrastructure across many flood management areas. What is the estimated cost of this infrastructure and where is it likely to be located?**
- Floodplain restoration or augmentation represents the most sustainable form of strategic flood risk solution by allowing watercourses to return to their multiple benefits through river restoration and possible habitat creation, which help to deliver both flood risk management and green infrastructure /biodiversity opportunities. **It is unclear what this entails, where it is proposed and the likely costs.**

Water (flood risk)- Paddock Wood Infrastructure Framework 2024	Range of Strategic flood risk mitigation measures -Raised platforms -Floodwater Storage Areas -Targeted flood embankments -Causeways with culverted channels underneath -Natural flood management -Floodplain restoration and augmentation -Further projects will be included following further modelling and FRA work on a site specific basis	Critical	Moderate	Short/medium/long	EA/KCC/TWBC/ private developer	.	Developer funding (IL/S106) + Housing Growth Fund/KCC/EA
				Short/medium			

Sport and Recreation

9.57. The Town Council convened a meeting with sports teams that are located in the town to discuss the Local Plan and its proposals and to provide a summary of this meeting and the view of the teams to TWBC and the Inspector. We attach the Minutes from this meeting to our representations as Appendix 2.

9.58. A summary of the key points from the meeting is provided below:

- The Sports Hub is greatly needed.
- There was no increase in sports infrastructure with the previous 1200 houses.

- The combined population increase will double the town with limited proposals for an increase in sports facility.
- The swimming pool is still included with a proviso: STR/SS 1 15a) (which shall include a 25m swimming pool if feasible)
- The group still want to see a hub on the Eastlands area and explained to Borough Councillors present why this was the best site.
- There was considerable opposition from the group for second athletics track on Mascall's grounds. The lack of cooperation between the Academy Trust and other bodies was clear with multiple examples provided. The Academy charges very high costs (£7k/year) for use of indoor facilities for young athletes and storage. They want the athletics club to vacate the storage but there is nowhere else to store this. The school is not charged for use of the athletics track.
- The difference between funding required for expansion of the tracks on the existing site is far less than re-provision on the school grounds. The money saved could be spent on an outdoor sports hub at Eastlands/elsewhere in Paddock Wood.
- Each group presented their problems with lack of suitable pitches to expand and the lack of a clubhouse for after-match social gatherings - this is another key reason why the Sports Hub would be beneficial. Clubs have demand for new teams, e.g. girls and youth, but cannot provide the pitch space.
- The rugby club are unhappy about car parking on Putlands field - they need an additional pitch and access to changing facilities in the sports centre, which currently has very limited opening times.
- The tennis provider needs a site with 4 - 6 courts with flood lighting to play longer into the day - this could be at the sports hub. There does not appear to be any mention of the skate park in the plan and this is required.
- It was suggested that the Town Council approach Crest Nicholson to discuss use of the Eastlands site.

9.59. The IDP sets out the Borough requirements for the various open space and recreation typologies as follows:

- Allotments - 5.34 Hectares
- Amenity Green Space/Natural Green Space - 14.25 hectares
- Park and Recreation Grounds (combined) - 19.59 hectares
- Play Space - Children - 0.71 hectares

- Play Space Youth - 0.71 hectares Total - 40.60 hectares

9.60. However the evidence supporting these requirement figures is the Tunbridge Wells Borough Open Space, Sports and Recreation Study which was prepared in 2017. This evidence was prepared seven years ago and is clearly out of date. It was prepared as the three developments in Paddock Wood were being started. Sports and recreation needs have changed significantly since then as the additional 1,150 homes are now nearly completed.

9.61. The IDP does not indicate how these typologies or even overall amount of space is required by each settlement. The IDP says these will be addressed through the Allocations in the plan however this is not set out for Paddock Wood.

Paddock Wood and East Capel	<ul style="list-style-type: none"> • 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 • Support for PW Juniors as a juniors club • Memorial recreation ground should also be protected for football use • Upgrades to Putlands - all-weather pitch, 4x tennis/netball • Upgrades to Green Lane - pavilion, rugby, football 	Range of facilities required, including: <ul style="list-style-type: none"> • Indoor sports centre including pool, dry side fitness facilities, extension to Putlands Leisure Centre (4 lane pool, 4 court hall, health/fitness gym, studio. • New community hall •
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Parish	Requirement (outdoor): open space, sports and recreation grounds, sports pitches, allotments, children and youth play space, amenity green space	Requirement (indoor/built facilities): sports halls, leisure centres, swimming pools, community halls
	<ul style="list-style-type: none"> • Expansion of athletics track from four to six lanes • Pitch provision within Paddock Wood and land at east Capel development site 	

Table 14: Sport and recreation provision needs for settlements within Tunbridge Wells borough

Infrastructure Type	Project	Priority	Risk	Timing	Delivery Body	Indicative Cost	Funding Position
Open Space, Sport and Recreation	Allotment Provision	Highly Desirable	Low	Short/medium/long	Private Developer	£464,285	Developer funding (IL/S106)
Open Space, Sport and Recreation	Children's Play Area	Highly Desirable	Low	Short/medium/long	Private Developer	£935,220	Developer funding (IL/S106)
Open Space, Sport and Recreation	Amenity Space	Highly Desirable	Low	Medium	Private Developer	£1,121,709	Development Funding (ILD/S106)
Open Space, Sport and Recreation Paddock Wood Infrastructure Framework 2024	Sport pitches contribution (as per Open Space SPD)			Short/medium/long		£4,852,397	
Open Space, Sport and Recreation	Expansion of athletics track from four to six lanes	Highly Desirable	Moderate	Medium/long	TWBC/TC/private developer	£819,999 approximate	Developer funding (IL/S106)
Open Space, Sport and Recreation Paddock Wood Infrastructure Framework 2024	Indoor sports centre including pool, dry side fitness facilities, extension to Putlands Leisure Centre (4 lane pool, 4 court hall, health/fitness gym, studio)	Highly Desirable	Moderate	Medium	TWBC/TC/private developer	£9,210,000	Developer funding (IL/S106)
Open Space, Sport and Recreation Paddock Wood Infrastructure Framework 2024	Upgrades to Putlands - all-weather pitch, 4x tennis/netball	Highly Desirable	Moderate	Medium	TWBC/TC/private developer	£1,550,000	Developer funding (IL/S106)

Infrastructure Type	Project	Priority	Risk	Timing	Delivery Body	Indicative Cost	Funding Position
Open Space, Sport and Recreation Paddock Wood Infrastructure Framework 2024	Upgrades to Green Lane - pavilion, rugby, football	Highly Desirable	Moderate	Medium	TWBC/TC/private developer	£735,000	Developer funding (IL/S106)
Paddock Wood Town Council identified items	Paddock Wood Neighbourhood Plan						
PADDDOCK AND							

Public Realm, Art, and Culture

This section of the IDP includes no projects for Paddock Wood despite the critical importance of public real, art and culture infrastructure to be delivered alongside the strategic growth at Paddock Wood to create a sense of place and simply the creation of a 'dormitory town'. There was previously a public art gallery at Mascalls School which was closed when the Academy took over. It is important to note that many artists working in Paddock Wood have nowhere to display their works.

10. Viability Appraisal following completion of Final IDP-Main Report (08_2024) Main Report & Appendices I-III (PS_106a, b, c ,d)

- 10.1. The Viability Appraisal explains (Paragraphs 1.1.2 – 1.1.3) that with the exception of the infrastructure cost changes (see Appendix I, Table 1B), all the of assumptions remain as per the December 2023 addendum report including the Submission Local Plan development management policies (those policies that influence viability through additional cost to development). Therefore, it has not been necessary to update the assumptions wholesale – all remain appropriate to continue with for this strategic assessment purpose. It states that the current results provided here can be compared readily with the previous set (as reported February 2021 and again in December 2023) – see Appendix II.
- 10.2. However, it is not easy to compare the previous viability reports with the 2024 Addendum as 'Table 1B: Changes to Infrastructure Costs from Viability Addendum to Viability Addendum Update (August 2024)' uses new / different terminology for the strategic transport infrastructure projects.
- 10.3. For example, the 2023 Report estimated for 'Colts Hill Improvements' a cost of £7,250,000 and the 2024 Report estimates for 'Colts Hill Bypass Badsell Road Roundabout etc' a cost of £10,245,219. It is unclear what was assumed in the previous Colts Hill Improvements and what is included in the Colts Hill Bypass / Badsell Road Roundabout etc' in terms of what has been added or removed and the reason for the increase of circa £3m.
- 10.4. When one compares the overall costs for the strategic transport infrastructure in the 2023 and 2024 Report the former total was £12,597,498 and the latter is £17,405,218 which is a difference of an additional £4,807,720 yet it is not clear on what pieces of infrastructure or cost estimates has changed.
- 10.5. It is also unclear as to why four of the infrastructure items are indicated as '63% of cost' which also was not the case in the previous Viability Studies. For example why is payment required for Halls Hole Road, Sandhurst Road at 63% costs? Are other developers from other areas contributing to these developments as well?
- 10.6. On a similar point are these developers contributing to the Colt's Hill Bypass and the highways changes in Paddock Wood?

Colts Hill Improvements	-7,250,000	73	84	Monthly
A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout	-1,149,999	25	36	Monthly
A228 Maidstone Road / Whetsted Road priority junction	-172,500	13	24	Monthly
A228 Maidstone Road / B2017 Badsell Road (Colts Hill) roundabout	-2,300,000	13	24	Monthly
B2017 Badsell Road / B2160 Maidstone Road signalised junction	-1,149,999	13	24	Monthly
B2160 Maidstone Road / Commercial Road priority junction	-575,000	13	24	Monthly

Excerpt from December 2023 Addendum Report

Somerhill Roundabout improvements B2017 A26	-1,000,000	97	108	Monthly
Hop Farm Roundabout improvements B2160 A228	-1,149,999	37	48	Monthly
Colts Hill Bypass / Badsell Road Roundabout etc	-10,245,219	73	84	Monthly
A267 / B2169 Birling Road	-500,000	97	108	Monthly
B2017 / Hartlake Road	-500,000	49	60	Monthly
Five Oak Green traffic management B2017	-230,000	97	108	Monthly
Woodgate Corner (A228 / Tonbridge Road / High Street) = 63% of cost	-1,260,000	49	60	Monthly
A21 west dumbbell roundabout = 63% of cost	-630,000	49	60	Monthly
Halls Hole Road junction = 63% of cost	-945,000	49	60	Monthly
Sandhurst Road junction = 63% of cost	-945,000	49	60	Monthly

Excerpt from August 2024 Addendum Report

10.7. The other change in the 2024 Addendum Report is the New Health Facility which was estimated as £3m in the 2023 study and is now estimated as £1.7m which is nearly half the cost previously estimated. However, there is no explanation as to why this estimate has been so drastically reduced.

10.8. There are a number of additional key points regarding the Viability Study which we summarise below:

- Where have the infrastructure cost estimates come from and how have these been verified by an independent cost consultant? If the estimates have come from TWBC's consultants, please can they provide the source of their assumptions otherwise how can the estimates possibly be relied upon?
- The updated IDP includes very many blank or 'TBC' fields in terms of the infrastructure cost estimates. How have all of these missing estimates been factored in the Viability Study if at all?
- Garden Settlement Principles have not been included in the Viability Study despite these being a policy requirement. For example, Principle 9: Legacy and stewardship arrangements: should be in place for the care of community assets, infrastructure, and public realm, for the benefit of the whole. What legacy and stewardship arrangements have been costed and factored into the Viability Study?
- Compensatory improvements to the Green Belt are a key measure that needs to be included in the Viability Study which have not.
- The costs of safeguarding land at Mascall's Academy does not appear to be assessed.
- The costs of safeguarding the land at the existing wastewater treatment works does not appear to have been assessed.
- The costs of delivering a new wastewater treatment works does not appear to have been assessed in the event that this is required.
- We note that the 'Upgrade Hop Pickers Line for cycling and walking' has no estimate in the IDP despite this being a key sustainable link required in Paddock Wood. How has this been included in the Viability Study estimates?

11. PS_107 Action Note for Action Point 30 re_ LP and 5yr Housing Land Supply Positions (06_2024)

- 11.1. The updated housing trajectory is unrealistic for Paddock Wood. We have set out previously how the trajectory and delivery rates are unrealistic however now seeing the trajectory breakdown for each parcel and developer within each parcel it raises even more serious questions about its reliability. We note that the Parcels do not align with those in the updated Policy as they are simply called ‘West’ and ‘East’ parcels which really confuses matters, and they should align with those in the updated Local Plan Policy for Paddock Wood and east Capel.
- 11.2. Furthermore, there is no ‘read across’ between this trajectory and the IDP in terms of what the trigger points are for the delivery or infrastructure required for each parcel based on the amount of development delivered.
- 11.3. It is unclear how the figures in Table 4 for Paddock Wood as a Strategic Urban Extension tally with the figures one sees elsewhere in the Local Plan such as in Policy STR/SS1 which allocates the site for 2,450 dwellings? There appears to be inconsistencies throughout the documentation.

Parish/Settlement	Local Plan allocations	
	Lower	Upper
Royal Tunbridge Wells	1,416 <u>1,278</u>	1,536 <u>1,421</u>
Southborough	42	42
Paddock Wood	3,932 <u>2,817</u>	4,032 <u>2,975</u>
Strategic urban expansion*	3,490 <u>2,374</u>	3,590 <u>2,532</u>
Town centre	30	30

Table 4 of PS_107

Development Lead in Times

- 11.4. The Trajectory is particularly unrealistic in terms of when it assumes that housing delivery will commence. The first delivery year assumed is 2025/26 with 10 dwellings at the East Parcel (Persimmon). This is next year.
- 11.5. In the following year (2026/27) it assumes 40 dwellings on each of the East Parcels. Then in 2027/28 it assumes delivery across all four parcels with a quick start for both of the West Parcels.
- 11.6. ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields) (see Appendix 3 of these representations) provides an update on important research on the delivery of strategic sites across England. Its findings are that for sites of 2,000 dwellings or more (like Paddock Wood) that it takes between 4 and 7.9 years from the validation of the first planning application to the first dwelling being delivered (see Table below).

Table 3.1 Lower quartile, median and upper quartile timeframe from validation of the first application to completion of the first dwelling (years) by site size

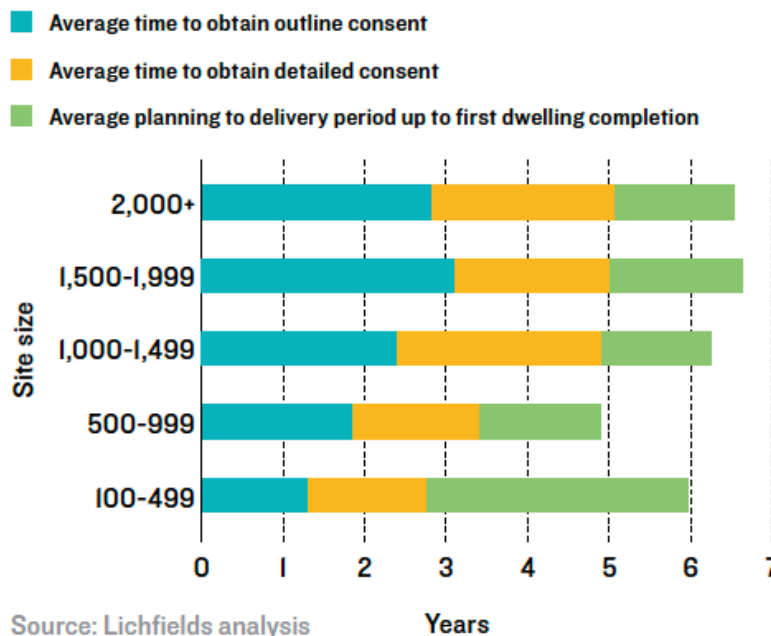
	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.0
Median	2.7	5.2	4.0	5.4	5.3	6.3
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

Source: ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields)

11.7. The Report updates the previous report on the average time taken from gaining outline permission to the completion of the first dwelling on site (see below). This indicates that it takes on average around 3 to 4.6 years from the grant of outline planning permission to deliver the first dwelling. It concludes that at the time of its granting, an outline permission will deliver limited housing in a five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Source: ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields)

11.8. So, we ask, what is TWBC's assumption about each of the Parcels (and for each developer within the parcels) in terms of:

- When will each Masterplan will be prepared and approved?
- When will the pre-application process take place?
- When will an outline application be submitted and approved for each parcel?
- When will a full application will be submitted and approved?
- When will reserved matters applications will be submitted and approved?
- When will the S106 for each parcel is expected to be agreed?
- When will the pre-commencement conditions for each parcel be agreed by TWBC?
- What are TWBC's assumptions for the opening up works required for each of the sites and combined?
- What infrastructure is required to be funded and / or delivered prior to commencement for each of the parcels?
- What is the planning approval process and timing for each piece of off-site infrastructure for example the Wastewater Treatment Works upgrade or new facility given that the existing works are at capacity? In terms of the transport infrastructure what is the planning approval process and timing for the Colts Hill Bypass?

11.9. TWBC needs to answer these questions so that a realistic housing trajectory can be prepared as the current version will lead to a shortfall in housing in the borough over the first five years upon adoption. As a result, the borough will be subject to planning appeals due to a lack of a five year housing land supply. With the Local Plan still at Examination there is still an opportunity for TWBC to allocate additional housing sites to ensure that the shortfall of anticipated delivery at Paddock Wood is addressed.

11.10. The additional and important benefit of this approach is that the master plans and planning applications at Paddock Wood are not 'rushed through' in hopes that the development will meet unrealistic commencement dates.

Housing Delivery Rates

11.11. We also question the delivery rates in the housing trajectory based on the amount of infrastructure required at each phase which still remains unclear. Linked to this is the question about how the funding of infrastructure will work? Are the developers going to forward fund infrastructure costs?

11.12. The housing delivery rates have been updated in the Lichfields report which concludes that the build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of their analysis. TWBC's housing trajectory assumes the following delivery rates by year which are clearly well in excess of what should be considered achievable delivery rates.

- 2027/28: 190
- 2028/29: 260
- 2029/30: 260
- 2030/31: 287
- 2031/32: 287
- 2032/33: 280
- 2033/34: 280
- 2034/35: 280
- 2035/36: 220

11.13. The assumptions made in the revised housing trajectory are simply unrealistic and are setting TWBC and its communities up for housing shortfall in the first five years of the plan following adoption and over the remainder of the plan period.

12. PS_109 Revised Policy Wording and Supporting Text for PolicySTR1–The Development Strategy (09_2024)

12.1. We have a number of comments on the proposed revised policy wording and supporting text for Policy STR1 (The Development Strategy).

Supporting Text (Main Modification version)

12.2. It is unclear where this text is proposed with the supporting text. Presumably this is simply an addition to the existing text in the submission plan?

12.3. Despite the proposed wording (paragraph 4.57) stating that early review of the Local Plan *“will identify and assess ‘reasonable options for meeting housing needs without prejudice’* the rest of the proposed wording regarding Tudeley reads as if it is a foregone conclusion that a new settlement at Tudeley Village will feature in the review.

12.4. As explained above, this type of contradictory text is a thread throughout the proposed supporting text. For example, it states (paragraph 4.54) *“It is noted that the Inspector did not conclude that the proposal for a new settlement at Tudeley Village was inevitably unsound; rather, that due to a number of uncertainties the exceptional circumstances test had not been met”*. Yet in the paragraph that follows (paragraph 4.55) it states that *“As such, in order to have the plan found sound and adopted the revised development strategy in the Local Plan now excludes Tudeley Village”*. If the removal of a new settlement at Tudeley Village is required in order to make the Plan sound then surely the proposals at Tudeley were unsound – is this not the case?!

12.5. We question why the background to the proposals at Tudeley is required at all given that there will be a final Inspector's Report at the conclusion of the Examination so that if anyone wishes to understand the final conclusions one can be directed to the Inspector's Final Report.

Policy STR 1 - The Development Strategy

12.6. The policy does not set out the quantum of development allocated by source or settlement which it should do in order for it to be a sound policy.

12.7. The policy simply states that Paddock Wood will be a *“major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions”* yet it does not set out the amount of development (and no mention of employment), the number of parcels or what the supporting infrastructure is including schools, walking and cycling infrastructure, public transport, wastewater treatment works etc.

- 12.8. At paragraph it refers to *“some reduction in the area of Green Belt notably for land east of Capel (adjacent to Paddock Wood)”*. This downplays the very significant hundreds of hectares of Green Belt being proposed for release at Paddock Wood and the quantum of Green Belt proposed for release here should be stated in the policy.
- 12.9. Regarding the ‘Early Partial Review’, we question how TWBC considers this approach of commencing a review within six months of adoption will be any different to that likely to be imposed through the revised NPPF?
- 12.10. Furthermore, proposing that the ‘Partial’ review can simply focus on unmet housing needs particularly if the NPPF will impose increased housing numbers for the borough.