

Public Consultation on Tunbridge Wells Borough Council's Local Plan: New Evidence Base Documents – summary and response table for comments on the Final Infrastructure Delivery Plan (PS\_105)

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
NEBD5-1	Cllr Don Kent				Not stated	<p><b>[TWBC: This is also in table 4) Flooding and Flood Risk and 6) Infrastructure]</b></p> <p>Both Hotspots along Badsell road need addressing first before housing. 2nd the flow of water from Matfield and Pembury need to be addressed first before anymore housing. Any housing within the Badsell road which obtains 106 money must come to Paddock Wood. The need for the Colts Hill bypass must also be addressed this time before anymore housing as it's been promised before and then been removed of any scheduling of highway improvements.</p>	<p><b>Legally non-compliant and unsound</b></p> <p>Any housing built on Badsell Road will want to use Paddock Wood facilities but any s106 money will go to Capel which is unjust. It appears the only thing Paddock Wood will get is housing, with only promises of infrastructure and service improvements.</p>	<p>As indicated in Table 4 of the IDP [ <a href="#">PS_105</a>] of the 2,374 – 2,532 dwellings that will be delivered as part of the STR/SS 1 development some 997 – 1,063 will be within Capel Parish. The S106 Infrastructure needs are set out in the IDP and clearly identified in the revised viability modelling. The infrastructure needs are specific to the development and identify where they will be spent.</p>	<p>Yes, I wish to participate at the examination hearing session so I can address the issues that may be brought up, plus I have a right to be heard</p>
NEBD9-6		Redrow and Persimmon	Judith Ashton	Judith Ashton Associates	PS_105		<p><b>Legal compliance and soundness not stated</b></p> <p>Para 1.4 refers to an Appendix 2 – Paddock Wood Specific Delivery Strategy but no such appendix appears in the document.</p> <p>The part of section 3 which addresses transport matters could be improved and assist the reader if it clearly explained what is meant by the 'Colts Hill Bypass'.</p> <p>P51, para 3 still refers to '<i>longer term housing developments in Tunbridge Wells Borough, notably at Paddock Wood/Tudeley necessitating a new 6FE Secondary school within the Paddock Wood area</i>'. This is incorrect and conflicts with what is set out on the next page and required in policy STR/SS1 as now amended by PS_095. It thus needs to be updated.</p> <p>Pages 68 – 71 (especially para 3.146) on waste water needs updating as it does not appear to reference the latest discussions between the Council and Southern Water about where Southern Water now are in terms of capacity and what is needed to serve the new developments. The waste water section of table 10 also needs to be updated in terms of what is says borough wide and specifically for PWeC.</p>	<p>The reference to the Paddock Wood Specific Delivery Strategy is a drafting error and this in fact is incorporated within the <u>Strategic Sites Masterplanning Addendum</u> (page 30 onwards) and within the Strategic Infrastructure table of the updated <u>Policy SS1</u>.</p> <p>The comment regarding non-selective secondary schools on page 51 is also a drafting error and the correct provision is listed on the following page relating to additional requirements to meet future growth.</p> <p>Comments regarding Waste Water infrastructure are noted.</p> <p>Table 14 on page 106 correctly refers to the sports and recreation requirements from the proposed growth and does not refer to any potential additional sports infrastructure at Mascalls at this stage. This is because the ability of the school to incorporate a running track is only identified within an initial feasibility study at this stage which could change as the scheme progresses. The inclusion of the Elm Tree sports location in PW is correct and</p>	<p>Not stated</p>

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							<p>Table 14, in referring to the proposed sports and recreation facilities to be delivered at Paddock Wood, references Elm Tree Land which is not mentioned in the updated Policy STR/SS1 or VA so we assume this is a mistake and will be deleted in the next iteration of this document.</p> <p>P135 in appendix 1 refers to a project referenced as ‘LCWIP Phase 2 cycling and pedestrian within existing Paddock Wood town and low traffic neighbourhood network within existing Paddock Wood town’ with a cost of £4.05million set against it. As this does not feature in the VA (PS_106b), clarification would be appreciated as what this is meant for and how it has been accounted for in the VA.</p> <p>We also note certain items identified in PS_106b as attributable to the PWeC development are not in the PW section of the VA, but rather the borough wide and cross boundary costs, which is a tad disingenuous if the PWeC sites are paying for them. [see original rep for examples]</p> <p>The following costs are identified in the VA but not the IDP:</p> <ul style="list-style-type: none"><li>• Climate change adaption</li><li>• Providing 3 x G&amp;T pitches to the north west</li><li>• Providing Part M4(2), Part M4(3) and BNG</li></ul> <p>Given the above, we are concerned about the level of constancy between the IDP and other documents. We suggest the Council do a detailed review of both to ensure this is addressed prior to main modifications.</p>	<p>whilst is not a location identified for significant new provision, as part of the <u>Strategic Sites Masterplanning Addendum</u>, primarily due to lack of space for use intensification, it is an existing facility which requires enhancement and would experience increase use as a result of the proposed additional housing growth. As such, enhancement of this existing community facility (and others such as the memorial field) could benefit from some enhancement through the S106 process.</p> <p>Reference to the LCWIP Phase 2 is correctly stated which only refers to PW. Funding has been allocated within the viability assessment, although the exact amount is subject to refinement due to the high-level nature of this work. The Council is confident that the LCWIP measures can be funded and delivered through the planned growth at PW.</p> <p>The comments regarding the cross referencing between the IDP and the Viability Assessment are noted. This is an important matter which will be reviewed further ahead of main modifications to ensure consistency between the documents.</p>	
NEBD12-2	Mr Benjamin Broome				PS_105	That no expansion in secondary education provision in the St John's area be considered until appropriate public transport and cycle provision is delivered fore the current community.	<p><b>Legally compliant but unsound</b></p> <p>Public transport, cycle and education sections</p> <ul style="list-style-type: none"><li>• Seems to lack a coherent view of the interplay between the boroughs infrastructure needs with respect to public transport, cycling and</li></ul>	<p>Throughout the plan-making process the Council has engaged with infrastructure providers to inform the development strategy. This has included on education matters.</p> <p>When plan-making the Council is required to plan for supporting</p>	No, I do not wish to participate at the examination hearing session

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							<p>education. Tunbridge Wells has five large secondary schools essentially co-located. Any plans to improve local bus services, cycle ways and considering educational provision, should take a strategic view of the needs and locations of this huge secondary school aged community as a whole.</p> <ul style="list-style-type: none"> <li>Request to deliver the cycleways through the borough as soon as possible and ensure better (more timely and affordable) local bus transport to the boroughs secondary schools.</li> </ul>	<p>infrastructure to meet the growth arising from the Plan's development strategy, not to solve any existing infrastructure concerns there might be (recognising of course that in some instances, growth and supporting infrastructure clearly results in a consequential benefit for the wider community).</p> <p>The evidence base supporting the Plan includes various reports/documents relating to active travel – Tunbridge Wells Public Transport Feasibility Review (<a href="#">PS_040</a>); Tunbridge Wells Bus Feasibility Technical Note (<a href="#">PS_058</a>); Provisions for Sustainable and Active Travel (<a href="#">PS_053</a>) and the Local Cycling and Walking Infrastructure Plan (Core Document 3.115). These address public transport and active travel including the St John's area of Royal Tunbridge Wells.</p>	
NEBD15-6	Louise Goldsmith	Capel Parish Council			PS_105	<ol style="list-style-type: none"> <li>3.206 p.93 There needs to be a reference to Capel Village Hall where plans for a refurbishment/rebuild are in their initial stages.</li> <li>3.210 p.4 Delete “Additionally, it is considered that a new community hall should be provided as part of the proposed garden settlement at Tudeley Village.” But include reference to east Capel as well as Paddock Wood.</li> <li>P.106 table 14 i) amend “Requires improvements to football pitches at Five Oak Green recreation ground” there is only one football pitch ii) insert column three Capel “need for new/refurbished community hall”.</li> </ol>	<p><b>Legal compliance and soundness not stated</b></p> <p><i>[TWBC: see the previous column – Proposed Modifications]</i></p>	<p>Reference to a village hall was not made by CPC in its representation filed following the publication of the Councils response to the Inspectors Initial Findings, hence it has not been included in the IDP requirements or assessed as part of the PWeC viability assessment. Nevertheless, should the refurbishment/rebuilding of the Capel Village Hall meet the three tests for planning obligations as set out in the NPPF paragraph 57, even with the significant reduction in housing growth in the LP then it can be considered at the time of the application.</p> <p>The point regarding there being only a singular football pitch in Five Oak Green is noted.</p> <p>The Council can find no reference to Tudeley on page 127 of PS_105.</p>	Not stated

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						4. Delete reference to Tudeley village on table p.127.			
NEBD17-5	Adrian Pitts				PS_105		<p><b>Unsound, legal compliance not stated</b></p> <p>3.2 is unsound as KCC have said the A228 improvements are not deliverable and the B2107 improvements are being redesigned (<a href="#">source JTB Meeting October 2024</a>) despite previous agreement by KCC for the Fowlhurst Green development.</p> <p>P139: moderate risk for the A228 Colts Hill/Badsell Road roundabout improvements is an understatement. More s106 money allocated to this is required to make it sound.</p> <p>P140: 'Described as critical and low to moderate risk with £1.1million allocated is also not taking place despite being critical and low to moderate risk. Unsound basis for future development'.</p> <p>3.21: can officers assure residents that these requirements can be delivered after the information from KCC referenced above?</p> <p>3.63: There is no timeline or business plan for this. KCC contract management of service will be needed but it is not sufficiently detailed in this document to be sound.</p> <p>3.97: this contradicts other education documents, as Mascalls will be expanded by a maximum of 3FE. If a 6FE school is needed by the end of the development, a sound proposal would be to allow for this growth in the way it is delivered. Details of the need and planning for it is missing from the new evidence, e.g. the potential for additional places to be provided in West Kent Selective towards the end of the plan period. [TWBC: this comment most likely refers to para 3.79 rather than 3.97]</p> <p>Health – ICB: There is no detail on the delivery of this essential infrastructure despite ~£5, indicative costs and long-term strategy.</p>	<p>The proposals within the IDP will seek to deliver and unlock a stalled KCC scheme for the Badsell Road roundabout which is not possible to come forward without land which is outside of the highway boundary. The Badsell Road Roundabout and Colts Hill Bypass will enable this to come forward.</p> <p>The S106 contributions towards the road infrastructure will be secured at the point of development as set out in the revised policy STR/SS 1 and included in the revised infrastructure funding modelling [<a href="#">PS 106</a>].</p> <p>The response mistakenly thinks that the previous Badsell Roundabout works (which KCC are not currently progressing) are the same as those required as par to the CHB which will be delivered as part of the strategic development at PWeC.</p> <p>Various measures will be delivered as part of the LP growth at PWeC, many of these measures are part of the development parcels as set out in para 3.63.</p> <p>Para 3.97 relates to Health not education. Para 3.79 still has reference to a 6FE and Tudeley Village which needs removing. As it was included in error.</p> <p>The proposed figure for health service provision associated with PWeC is set out in the IDP at £3m following discussions with the Integrated Care Board.</p> <p>3.132 relates to the delivery of clean water t and is covered by</p>	Yes, I wish to participate at the examination hearing session - too many unanswered questions about the actual delivery of the LP not addressed in the documents provided.

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NEBD18-3	Ms Chantal Brooks	Brenchley and Matfield PC			PS_105		<p><b>Unsound, legal compliance not stated</b></p> <p>BMPC considers the proposal to move the Howell Surgery in Brenchley to a new site in Horsmonden not to be justified. It would disadvantage those in Brenchley who can currently walk to the surgery. Additionally, from the Patient Participation Group (PPG), BMPC understands that Howell Surgery neither has the funding nor the intention to build a new surgery. The PPG was informed</p>	<p>Throughout the preparation of the Local Plan the Council has engaged and consulted with statutory consultees and infrastructure providers to identify and plan for infrastructure needs arising from the proposed development strategy. Any infrastructure needs identified have been incorporated into the</p>	Not stated



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							<p>that even with AL/HO 3, the surgery has ample staffing and funding for both existing surgery sites, with the Horsmonden one to open on more afternoons.</p> <p><i>[TWBC: the rest of the comments relate to highways matters, see BMPC's comments in table 5 for additional context and further comments on PS_106]</i></p> <p>PS_105 only makes one mention of the Colts Hill Bypass (3.21) but does not include any costing, funding sources or timing for the provision of it. There is for improvements to the Badsell Roundabout, but nothing about the bypass itself. 'Bypass' appears 4 times in the document, predominantly in the context of the Badsell Roundabout improvements.</p> <p>No funding is shown for the implicit improvement of J107 at the southern end of the proposed bypass – why not?</p> <p>Appendix 1 shows the bus network enhancements between RTW, PW, Pembury and Tonbridge to be a moderate risk with medium timing, cost and funding to be confirmed. This does not give confidence that the services will be provided soon enough to influence travel choices. The problems at Kippings Cross now and our data shows traffic along the B2160 is already growing at ~3%pa.</p> <p>Additionally, KCC submitted its bus service improvement plan in 2021 with a funding requirement of £213m over 3 years. Given the £80m budget deficit at KCC, the prospects of it being able to subsidise new routes is minimal.</p>	<p>Infrastructure Delivery Plan (<a href="#">PS_105</a>).</p> <p>This has been evidenced in the many Statements of Common Ground (SoCGs) completed by the Council with infrastructure providers, which has included with the NHS Clinical Commissioning Board (now ICB) (Core Document <a href="#">3.132c(v)</a>) The Council will continue to work with all infrastructure providers, including the ICB on infrastructure matters, including health provision.</p> <p>Please see the Council's response to the comments submitted about highways and bus matters set out in the 'Highways, including modelling and mitigation' summary/response table.</p>	
NEBD19-1		B.Yond Strategic Ltd	David Neame	Neame Sutton	PS_105		<p><b>Legally non-compliant and unsound</b></p> <ul style="list-style-type: none"> <li>The Council produced the Infrastructure Delivery Plan (IDP) after the initial consultation and Stage 3 EiP hearings, which hindered a thorough consideration of the proposed revisions to the development strategy.</li> <li>How is the Council able to retrospectively support its development strategy through the</li> </ul>	<p>The final IDP (<a href="#">PS_105</a>) has been consulted on as part of the recent consultation. The Inspector will determine what further discussion about infrastructure delivery and / or the revised development strategy is needed, and this will be examined at the addition Hearing Session scheduled for the 14<sup>th</sup> of November (and Reserve Day the 15<sup>th</sup> of November) 2024.</p>	<p>Yes, I wish to participate at the examination hearing session as the matters raised in these representations are of a detailed and technical nature and flow from previous representations and verbal</p>

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							<p>production of this updated IDP nine months later</p> <ul style="list-style-type: none"><li>Inconsistencies between the IDP and the development strategy raising issues with the supply within the first 5 years post adoption<ul style="list-style-type: none"><li>The IDP (Appendix 1 - page 141) highlights that improvements to the A228 Colts Hill/Badsell Road roundabout are critical and scheduled for medium-term delivery (5-10 years from adoption) with a moderate risk in securing funding.</li><li>Section 2 of the IDP states that critical infrastructure is essential for enabling physical development and unlocking development sites, crucial for growth in the borough. Failure to provide this infrastructure could significantly delay development (para 2.33 of IDP)</li><li>A moderate risk proposal indicates some constraints or uncertainties in delivery, meaning it is not clearly deliverable according to Annex 2 terms (Para 2.34 of IDP).</li><li>Therefore, the IDP confirms that a critical infrastructure piece needed to unlock development at Paddock Wood faces constraints and uncertainties and is not scheduled for delivery within the first 5-10 years from adoption.</li></ul></li><li>Updated housing trajectory (<a href="#">PS 107</a> also known as TWLP/153) [TWBC: also see comments in the table regarding the PS_107 – Five Year Housing Land Supply Action Note] the Council states that its expectation is that the year of adoption will be 2025. Based on this assumption the Council anticipates delivery of some 800 no. dwellings at Paddock Wood in years 1-5 following adoption (<i>Appendix 1 of PS 107</i>). The delivery of 800 no.</li></ul>	<p>The Council has prepared a revised viability assessment to support the response to the Initial Findings [<a href="#">PS 061 a, b, c, and d</a>] which supports the changes to the development strategy infrastructure position. Subsequent further work with KCC Highways and National Highways and the councils transport consultants has resulted in a change to some of the highway infrastructure works. The additional projects have been included in the revised viability assessments that have informed this IDP [<a href="#">PS 106 a, b, c, d</a>]</p> <p>The Colts Hill improvements are indicated as critical infrastructure that must happen to enable physical development to take place, and to unlock development sites. Whilst land assembly may require intervention and use of compulsory powers, there is certainty on funding as it will be derived from the development itself, rather than relying on unidentified other sources as those that could be available from DFT.</p> <p>Other points raised are noted.</p>	<p>evidence provided at the earlier sessions for the EiP. B.Yond therefore wishes to address the Inspector directly on the matters raised in these representations and to provide further verbal evidence.</p>

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							<p> dwellings before the period it expects the critical infrastructure to begin delivery cannot be right.</p> <ul style="list-style-type: none"><li>Others examples of mismatch include the programmed delivery of further highway improvements, waste water infrastructure, education and healthcare provision, none of which appear to match with the proposed delivery trajectory for new homes.</li><li>Whilst B.Yond does not seek to raise specific concerns in relation to Paddock Wood itself as a strategic allocation, there is a clear problem with the evidence base in terms of the infrastructure the Council identifies as being critical and the timetable it proposes for the delivery of the new homes. This has a fundamental implication for the wider housing delivery strategy that is discussed further in the Housing Need and Delivery (including Policy STR 1) <i>[TWBC: see comments in the table regarding the PS_107 – Five Year Housing Land Supply Action Note]</i></li></ul>		
NEBD20-4		Save Capel			PS_105	<p><i>[TWBC: commented mentioned at page 29 of the original representation in relation to Policy STR/SS 1]:</i></p> <p>Para 14 the IDP (para 1.4) refers to “Appendix 2 – Paddock Wood Specific Delivery Strategy” which SC has been unable to locate.</p>	<p><b>Unsound, legal compliance not stated</b></p> <p>SC recognises and supports that the borough-wide Infrastructure Delivery Plan 2024 (“IDP”) is heavily focused on the infrastructure requirements to support growth at the PWeC site.</p> <p><u>Cost estimate and funding uncertainty</u></p> <ul style="list-style-type: none"><li>Nevertheless, the IDP remains high level, and has a number of major gaps – especially on top-down and “indicative” only costs and timing – resulting in considerable risk that development at PWeC may not be adequately supported.</li><li>£130m in high level costs for PWeC alone, with no evidence of funding that any of the funding has actually been secured, leaving uncertainty for flood risk mitigation, new schools delivery, and critical road projects.</li></ul>	<p>SC comments supporting the IDP focus on the infrastructure requirements for PWeC are noted.</p> <p>The national Planning Practice Guidance (PPG) supports this position and emphasises the need to ensure that the Local Plan is capable of being delivered, including with the provision of infrastructure. It states that early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies.</p> <p>The revised IDP supports the local plan in this regard however it is always going to be a high-level document that is subject to further iteration.</p>	<p>Yes, I wish to participate at the examination hearing session - SC intends to continue to participate fully in any remaining stages of the Local Plan’s review and will seek to make formal representations in any future hearings during which the issues raised in this representation are discussed.</p>



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							<ul style="list-style-type: none"><li>The absence of confirmed bottom-up costs and the lack of secured financing risk delays in infrastructure provision and calls the Plan's economic viability into question.</li></ul> <p><i>Over-reliance on developer contributions:</i></p> <ul style="list-style-type: none"><li>The IDP relies heavily on developer contributions, if contributions are insufficient, or if a developer is able to demonstrate that what is required from them renders the development unviable, introducing significant uncertainty and risk.</li><li>Delays in housing development can impact the delivery of critical infrastructure and vice versa.</li><li>No contingency plans are in place if developer contributions fall short, questioning the overall soundness of the Local Plan.</li><li>Health facilities: A new health centre in Paddock Wood is contingent on developer funding</li><li>New schools: Over £35 million for new educational facilities depends on developer contributions, risking potential overcrowding if delayed.</li></ul> <p><u>Unclear phasing &amp; delayed infrastructure delivery</u></p> <ul style="list-style-type: none"><li>The IDP lacks specific phasing or details on dependencies, grouping projects into 3 broad categories ("short term", "medium term", "long term").</li><li>Only high-level references to phasing are provided in 'Revised policy wording for STR/SS 1' (para 16), which is impractical for delivery planning.</li><li>No phased infrastructure delivery plan exists, nor is there an assessment of dependencies or risks of delayed delivery.</li><li>Required infrastructure may not be delivered in line with housing development, leading to a mismatch</li></ul>	<p>Where costs for infrastructure are necessary, in particular for Paddock Wood and east Capel STR/SS1 they have been identified in the viability assessment review <a href="#">[PS 106]</a></p> <p>The Council has worked with the developers and infrastructure providers to understand what is required in regard to Infrastructure. The developers are keen to progress at PWeC and as such there is a level of certainty regarding the delivery of the infrastructure that is identified. The NPPF para 20 states that strategic policies should set out an overall strategy for development and make sufficient provision for amongst other things infrastructure, and community facilities.</p> <p>It is notable that the need for the infrastructure is driven by the growth itself. Therefore, the health and education provision is directly related to the numbers of dwellings, and therefore developer funding is considered the appropriate source to enable it's delivery.</p> <p>The IDP sets out the timeframes for delivery as short medium and long-term which is common practice in adopted Local Plans.</p> <p>The Council proposes to form a PWeC Delivery Board which will oversee delivery phases of the strategic development subject of STR/SS 1. The delivery board will be the opportunity to formulate a more detailed infrastructure programme which can be overseen by members of the board who will include TWBC, developers and members of the Parish and Town Councils.</p> <p>Para 2.39 of the IDP states - The detailed costs for infrastructure</p>	

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							<p>between growth and infrastructure provision for example</p> <ul style="list-style-type: none"><li>○ Flood Mitigation: Unclear schedule may delay housing construction;</li><li>○ Road Infrastructure: Projects like the Colts Hill bypass lack specific milestones, risking traffic issues;</li><li>○ Healthcare facility: The scheduled date (2035) is too late; current facilities are overloaded and inadequate.</li></ul> <ul style="list-style-type: none"><li>• Delays in infrastructure could deter developers and buyers, slowing the delivery of development.</li><li>• A comprehensive, integrated and regularly updated delivery plan is necessary.</li></ul> <p><u>Delivery risk</u></p> <ul style="list-style-type: none"><li>• The IDP underestimates delivery complexities, posing high risks to several key infrastructure projects, but no PWeC infrastructure is seen as ‘high risk’.</li><li>○ Transport Infrastructure: The Colts Hill bypass is essential but faces funding and land acquisition issues, risking traffic congestion.</li><li>○ Flood Mitigation: Necessary flood protection measures are delayed, increasing the risk of flood damage to new homes.</li><li>○ Wastewater Treatment and Water Supply: Upgrades are required to manage increased demand, but delays could halt development due to complexity and cost.</li></ul> <p><u>Gaps and inconsistencies</u></p> <ul style="list-style-type: none"><li>• The IDP repeatedly refers to the “<i>Paddock Wood Infrastructure Framework 2024</i>” as containing</li></ul>	<p>will be fully considered at the planning application stage; therefore, figures contained within the schedule of this IDP are generally to be considered as being indicative and recognised as subject to change. This IDP, therefore, is intended to be a document that is regularly updated given the uncertainty and fluid nature of planning for infrastructure and is reflected in it being termed a ‘Live Document’ this will include reviewing the risk profiling of certain infrastructure.</p> <p>Paddock Wood Infrastructure framework is identified in Table 8 of the Paddock Wood Strategic Sites Masterplanning addendum <a href="#">[PS_046]</a> which will be updated for future reference as part of the IDP.</p> <p>Increase in bicycle racks at Tonbridge station will improve modal shift for those who may be travelling to Paddock Wood for example for work or school.</p> <p>Other points raised are noted and should revisions to the IDP be necessary they will be made.</p>	

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							<p>more detail on relevant infrastructure projects. We cannot find any such document in the evidence base. Is this titled differently or missing?</p> <ul style="list-style-type: none"><li>• The appendix lists the ‘<i>Closure of Hartlake Road to through traffic</i>’ as a project and allocates £500k to its delivery. SC is unclear why this measure remains in the Plan.</li><li>• Next, the Plan also proposes the ‘...<i>widening of Hartlake Road at the intersection with B2016</i>’, where it is unclear how this relates to the proposed closure of Hartlake Road.</li><li>• SC also questions why the increase in ‘bicycle racks at Tonbridge Station’ (£50k) remains in the IDP given the removal of Tudeley Village and any associated bicycle paths (which were anyway a non-starter as SC has evidenced in previous submissions).</li><li>• The provision of a Paddock Wood bus service is included twice in the IDP’s Appendix.</li></ul>		
NEBD23-1	Mr Bartholomew Wren	Tonbridge and Malling Borough Council			PS_105	TMBC considers that if the cross-boundary highway schemes can’t be clearly justified and funded, given that the allocation for Tudeley Village has been removed, they should be removed from the IDP.	<p><b>Legally compliant but unsound</b></p> <p>Transport requirements identified on page 44/45 for PW/Capel include schemes that will have impacts for residents and businesses in Tonbridge and Malling Borough. Further details on these and other cross-boundary schemes is presented in appendix 1 (p125) where there are five identified as essential and critical.</p> <p>TMBC questions whether any of these highways schemes are required now the Tudeley allocation has been removed. TMBC would like clarification as without clear justification in terms of development impacts, it is not considered that these schemes could be funded or delivered. TMBC would be opposed to the closure of Hartlake Road to through traffic to close to the junction with the B2017. This scheme appears to contract the proposed widening of this junction with the B2017 Tudeley Road.</p>	<p>The five junctions identified are included in the IDP pg 145 cover cross boundary infrastructure which will need reviewing in regard to removal of TGV.</p> <p>Vauxhall Roundabout – minor hotspot so is not critical and will be covered by Monitor and Manage proposals.</p> <p>A26/B2017 has been revised and is in the IDP later as Somerhill Roundabout. This will be modified in the IDP.</p> <p>Hartlake Road is still identified as a highway intervention under Monitor and Manage as set out under the STA (April 2024 <a href="#">[PS_103]</a>)</p>	No, I do not wish to participate at the examination hearing session

Public Consultation on Tunbridge Wells Borough Council's Local Plan: New Evidence Base Documents – summary and response table for comments on the Final Infrastructure Delivery Plan (PS\_105)

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NEBD24-8	Mr Nigel De Wit	National Highways			PS_105	We have previously provided the council with a copy of the Infrastructure Delivery Schedule which forms part of the IDP for the Crawley Local Plan; this document may also be found via the following link: <a href="https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-examination/crawley-borough-council-examination-documents">https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-examination/crawley-borough-council-examination-documents</a> as document CBC/KD/IP/07. We would recommend that a similar schedule be prepared for the schemes included in the Tunbridge Wells IDP document; this will allow the Monitor and Manage process to track the requirements and delivery of phased mitigation measures as implementation of the Plan progresses.	<b>Legally compliant and sound</b>  Broadly content the IDP has been updated to our satisfaction.  However, the IDP does not currently incorporate the current development trajectory in the form that we have previously suggested. This would benefit the monitor and manage regime by providing a starting point for determining the currency of the phasing of the supporting infrastructure alongside the development.	A Strategic Infrastructure table is incorporated within the updated <u>Policy SS1</u> , which sets out the required infrastructure specific to PW to accommodate the planned growth. A more specific table relative to infrastructure linked to housing trajectory has also been looked at and could be created to inform the Development Delivery Board.	National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.
NEBD27-4		Crest Nicholson	Jane Piper	Lucid Planning	PS_105		<b>Legal compliance and soundness not stated</b>  Paragraph 1.4 of refers to a non-existent “Appendix 2 - Paddock Wood Specific Delivery Strategy”; Appendix 2 actually contains “Existing open space by parish” so is likely to just be a drafting error. If not, PW developers need clarity on whether document exists and when it will be shared with consultees.  Crest is pleased to see that paragraph 3.20 references Colts Hill roundabout scheme changes and that funding from Church Farm, Mascalls Farm, and Mascalls Court Farm developments will be utilised to fund part of the revised roundabout.  Page 51, 3rd paragraph under “Secondary Schools (non-selective)” refers to a new 6FE Secondary school in Paddock Wood. This has been superseded by PS_096 and conflicts with policy STR/SS1 (PS_095). It needs to be updated.  Table 14 on page 106 should be updated to reflect Mascalls Academy expansion and its sports provisions as set out in Mascalls	The reference to the Paddock Wood Specific Delivery Strategy is a drafting error and this in fact is incorporated within the <u>Strategic Sites Masterplanning Addendum</u> (page 30 onwards) and within the Strategic Infrastructure table of the updated <u>Policy SS1</u> .  The comment regarding non-selective secondary schools on page 51 is also a drafting error and the correct provision is listed on the following page relating to additional requirements to meet future growth.  Table 14 on page 106 correctly refers to the sports and recreation requirements from the proposed growth and does not refer to any potential additional sports infrastructure at Mascalls at this stage. This is because the ability of the school to incorporate a running track is only identified within an initial feasibility study at this stage which could change as the scheme progresses. The inclusion of the Elm Tree sports	Not stated

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							<p>Academy Feasibility Study Review; references to Elm Tree playing fields should be deleted to align with policy STR/SS1.</p> <p>Page 137 of the IDP under Paddock Wood and East Capel, Transport (walking and cycling) references a £4.05 million cost for LCWIP Phase 2, which is not included in Viability Appraisal update and needs clarification or deletion.</p>	<p>location in PW is correct and whilst is not a location identified for significant new provision, as part of the <u>Strategic Sites Masterplanning Addendum</u>, primarily due to lack of space for use intensification, it is an existing facility which requires enhancement and would experience increase use as a result of the proposed additional housing growth. As such, enhancement of this existing community facility (and others such as the memorial field) could benefit from some enhancement through the S106 process.</p> <p>Reference to the LCWIP Phase 2 is correctly stated which only refers to PW. Funding has been allocated within the viability assessment, although the exact amount is subject to refinement due to the high-level nature of this work. Therefore, the COuncil is confident that the LCWIP measures can be funded and delivered through the planned growth at PW.</p>	
NEBD36-2	Catherine Adamson	Southern Water			PS_105		<p><b>Legal compliance and soundness not stated</b></p> <p>Southern Water confirms to have no comments relating to legal compliance or soundness.</p> <p>Note that in paragraph 2.46 of the Infrastructure Delivery Plan (IDP) the Authority’s commitment to update the IDP once the Local Plan is adopted, therefore confirm the intention to work with Tunbridge Wells to support them with this update.</p>	<p>This is noted. TWBC has worked with and will continue to work with Southern Water through the production of the Local Plan and in future plan-making.</p> <p>This IDP, is intended to be a document that is regularly updated given the uncertainty and fluid nature of planning for infrastructure and is reflected in it being termed a ‘Live Document’ this will include reviewing the risk profiling of certain infrastructure.</p>	Not stated
NEBD39-6	Stephanie Holt-Castle	Kent County Council (KCC)			PS_105		<p><b>Legal compliance and soundness not stated</b></p> <p><b>Highways and Transportation</b></p> <p>Paragraph 1.3 - It is stated that the IDP should be read in conjunction with Paddock Wood Infrastructure Framework 2024.</p>	<p>The reference to the Paddock Wood Infrastructure Framework 2024 and the Paddock Wood Specific Delivery Strategy is a drafting error and this in fact is incorporated within the <u>Strategic Sites Masterplanning Addendum</u></p>	Not stated



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							<p>However, this document is not included in the current consultation documents and does not appear to be listed with the other Local Plan related documents on the TWBC website. Please provide a copy or a link to this document.</p> <p>Paragraph 1.4 - It is stated that Appendix 2 includes the Paddock Wood Special Delivery Strategy, however, this is not the case as Appendix 2 of the IDP is the 'existing open space by parish (as identified within the Open Space Study 2018)'. It would be helpful if the Paddock Wood Special Delivery Strategy could be forwarded for review and included in the IDP.</p> <p>Paragraph 2.12 - The overall Development Strategy is set out in the proposed amended Policy STR1 – 'The Development Strategy'. The County Council has no comments relating to this document.</p> <p>Paragraph 2.14 – The paragraph sets out what is included within Section 4 of the Local Plan. The inclusion of the Vision and Validate and Monitor and Manage approach as defined by DfT Circular 01/2022 should be considered. Also to be included is the requirement for scheme delivery to be developer led by means of a S278 Agreement with a consortium of developers responsible for delivery where multiple developments need the mitigation schemes. The County Council, as Local Highway Authority, will assist and oversee the delivery of schemes via the Section 278 Approval process but will not act as the delivery body of the schemes.</p> <p>Paragraph 2.17 - Policy STR6 – Transport and Parking covers 'Key transport infrastructure and the priorities for sustainable transport modes.' This policy should be updated to reflect the mitigation requirements for the new Local Plan.</p> <p>Paragraphs 3.3 – 3.10 The County Council is supportive of the Vision and Validate and</p>	<p>(page 30 onwards). A Strategic Infrastructure table is also incorporated within the updated <u>Policy SS1</u>, which also sets out the required infrastructure specific to PW to accommodate the planned growth.</p> <p>The reference to the DfT Circular 01/2022 is noted and the Council is looking to incorporate provision for this as part of the main modifications process.</p> <p>The developer led delivery mechanism through the S278 process is noted. KCC's involvement in the S278 process and project management of the delivery would be important as well as the Development Delivery Board which TWBC will create and chair to discuss progress of the Strategic Development, timing for infrastructure delivery and allow stakeholders to communicate effectively between the main parties.</p> <p>Comments regarding Vision and Validate and the suggestion that 'Schemes may be varied subject to agreement with the Local Highway Authority' are noted and will be considered.</p> <p>A proposed new bus service for PW has been outlined and would be delivered to support sustainable travel options for the settlement, linking the proposed growth areas within the central locations within PW. This would be in accordance with the WSP bus studies which have evaluated the potential for such a service. The costings for which have been incorporated and adjusted to accord with the latest evidence.</p> <p>The comments regarding the list of schemes in the Monitor and Manage strategy are noted and TWBC agree this should be</p>	

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							<p>Monitor and Manage approach to infrastructure delivery. This is a strategy identified in DfT Circular 01/2022 and the principles can be applied to the local road network. The policy approach is required to plan for effective future network operation and the evaluation of the proposed growth and identification of appropriate mitigation across all modes.</p> <p>Paragraph 3.18 - It is stated that ‘there is a poor accident record on the A228 at Colts Hill’; this is no longer the case and evidence was reported to the recent Local Plan hearings to this effect. The STA includes a review of the crash record over the study area and the A228 at Colts Hill has not been identified as a crash hotspot.</p> <p>It is also reported that the A268/A229 crossroads in Hawkhurst suffers severe congestion at peak times, however, the junction is planned to be improved. Additionally, the junction has not been identified as a ‘hotspot’ in the Sweco Transport Assessment or TA</p> <p>Paragraph 3.21 - This covers the mitigation schemes identified to support the growth in the Revised Local Plan. Please add that ‘Schemes may be varied subject to agreement with the Local Highway Authority’.</p> <p>The list of schemes should be updated to reflect those identified in the latest transport evidence relating to the new Local Plan. Currently the list of schemes includes the mitigation relevant to the submitted Local Plan.</p> <p>Reference is made again to the ‘Paddock Wood Infrastructure Framework 2024’. The County Council requests this is forwarded for review.</p> <p>Paragraph 3.47 - Rail infrastructure improvements have not been identified, however, Policy STR6 includes the following statement: ‘Working with Network Rail and</p>	<p>flexible and responsive to changes in travel patterns.</p> <p>KCC’s comments regarding the Delivery Board are noted.</p> <p>The IDP does not specifically refer to SEND provision, although this is not an area of provision for which the Borough Council has control. Provision for Education is secured within the IDP and it will be for KCC (as Education Authority) to review/discuss SEND provision and requirements with TWBC when necessary as funds become available.</p> <p>KCC have asked for clarification on whether the order of Themes under section 3.0 is an order of priority and therefore related to the prioritisation narrative on page 13. The order is in the spirit of this prioritisation to avoid contradiction within the document.</p> <p>All other points made by KCC have been noted and will be addressed accordingly through the main modifications process.</p>	

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							<p>the train operating company to provide station infrastructure improvements where necessary and working strategically to retain and improve the rail network by increasing the attractiveness of travelling by rail, including to multiple destinations.'</p> <p>Enhancements to Paddock Wood Station to provide cycle storage, pedestrian improvements and bus facilities could be explored further as these would be helpful in delivering the high modal shift vision.</p> <p>Paragraph 3.63 - The proposed bus improvements listed should be updated to reflect the latest evidence provided to support the Revised Local Plan and in particular the WSP bus studies.</p> <p>Appendix 1: Infrastructure Delivery Schedule. - This should be updated to reflect the mitigation identified in the latest evidence provided to support the Revised Local Plan as the list currently includes mitigation relevant to the submitted Local Plan.</p> <p>The locations listed below should be included in the Monitor and Manage strategy and the IDP.</p> <ul style="list-style-type: none"><li>- Junction 13 A228/2016 Maidstone Road,</li><li>- Junction 14 A228/Alders Road/Crittenden Road</li><li>- Junction 13 A228/Maidstone Road</li><li>- Junction 72 A267/B2169 Birling Road</li><li>- Junction 88 B2017/Hartlake Road</li><li>- Junction 107 Matfield Crossroads</li></ul> <p>The list of schemes in the Monitor and Manage strategy must be flexible and responsive to changes in travel patterns.</p> <p>The Infrastructure Delivery Plan (IDP) includes a £1,725,000 subsidy for a new bus route. This does not tally with the total amount of subsidy identified in the WSP bus studies (PS_040 Public Transport Feasibility Study Review and PS_041 Paddock Wood</p>		

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							<p>Bus Service Options). The IDP should be updated.</p> <p>The delivery body should be amended to reflect the latest position of the County Council in that:</p> <ul style="list-style-type: none"><li>- Unless schemes are small scale schemes and with standard costs/low risk or cost increase they will be progressed via the County Council’s Developer Agreements process, including technical approval of designs and oversight.</li><li>- The County Council will provide technical support to district councils where schemes are identified through the Local Plan process, ideally through a scheme board with the developers forming a delivery consortium.</li><li>- Where third-party land may be required, the County Council will assist with any Compulsory Purchase Orders and potential Side Roads Orders that are likely to be needed.</li><li>- Where schemes have been identified as being required to mitigate the impact of a number of development sites coming forward in a similar time frame in advance of the Local Plan process, developers will deliver the scheme via a delivery consortium or lead developer.</li><li>- Schemes needed to mitigate the impact of a development site will be progressed through the County Council's Agreements process. KCC will not accept contributions to schemes agreed unilaterally between TWBC and developer.</li></ul> <p>The IDP should be updated to reflect the above comments and latest evidence, including interventions within the mitigation scenario LPMSH2, sites for inclusion in the Monitor and Manage Strategy and removal of superseded or obsolete schemes as a result of the change in development strategy. A spreadsheet or table showing when delivery of mitigation is currently predicted to be needed in relation to the</p>		

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							<p>housing and employment trajectory would be useful.</p> <p><b>Development Investment</b> The County Council notes the absence of any mention of Special Education Needs and Disabilities (SEND) in the document, even if it is to indicate there is sufficient provision for the plan period. This should be corrected.</p> <p>The County Council requests clarification on whether the order of Themes under section 3.0 is an order of priority and therefore related to the prioritisation narrative on page 13. If so, this should be made clearer and better linked.</p>		
NEBD41-2	Emma Cunnington	Sport England			PS_105	<p>Sport England recommends updating the Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS) in collaboration with National Governing Bodies (NGBs) to fully review existing sport and recreation facilities, as a matter of crucial understanding to the strategic needs in Paddock Wood with the addition of over 2,500 homes.</p> <p>Also recommends discussions with all NGBs to create a management plan and better understand potential financial support.</p> <p><i>[TWBC: see detailed Reason in the next column - Comment Summary]</i></p>	<p><b>Legal compliance and soundness not stated</b></p> <ul style="list-style-type: none"><li>The evidence base for the infrastructure delivery plan for Theme 6: Community, Public, and Social Services, specifically regarding Community Centres and Related Strategies, is outdated. The Tunbridge Wells Borough Council Built Sports Facilities Assessment (2018) is over six years old. According to Sport England’s Assessing Needs and Opportunities Guidance, assessments should be reviewed and updated within five years to remain current.</li><li>Pages 104 and 105 of the Infrastructure Delivery Plan mention funding sources such as Section 106, Sport England and Governing Bodies. However, Sport England is concerned that no thorough understanding of the financial support needed for sustainable sports provision has been given, as such recommends discussions with all National Governing Bodies (NGBs) to create a management plan and better understand potential financial support.</li><li>NPPF Paragraph 31 states that "The preparation and review of all policies should be underpinned by relevant</li></ul>	<p>The Local Plan evidence informed the production of the SLP and is part of the core document library <a href="#">[3.88 a-g]</a> which sets out the work undertaken to inform the allocations in the plan. This included two significant strategic development areas – Tudeley Village and growth at Paddock Wood and land at east Capel. The necessary sports infrastructure was extensive, however under the revised proposals with the removal of the TGV proposals and a reduction of housing at PWeC there is a general reduction in dwelling numbers by approximately 3800 dwellings from the actual developments. Nevertheless, the sport and leisure provision per dwelling cost has been increased by 58% to ensure that sport facility delivery is still of the highest standards.</p> <p>The current evidence base has included stakeholder involvement to inform the delivery of infrastructure and covers the same plan making cycle. The evidence will be updated as part of the local plan review.</p> <p>The Council intends to continue dialogue with the Town Council</p>	Not stated



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							<p>and up-to-date evidence." . However, the Infrastructure Delivery Plan (and Policy STR/SS 1) lacks current evidence.</p> <ul style="list-style-type: none"><li>• Sport England has urged Tunbridge Wells to update the Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS), which were adopted in 2017 and are now outdated. Sport England also did not oversee the assessments done in 2018 and 2019.</li></ul>	and Parish Council and developers though a delivery board on how, where and to whom the significant development funds will be apportioned.	
NEBD42-6	Carol Williams	Paddock Wood Town Council	Troy Hayes	Troy Planning + Design	PS_105		<p><b>Legally non-compliant and unsound</b></p> <p>General comments Compensatory improvements to the Green Belt are a key measure that needs to be included in the IDP.</p> <p>The engagement details set out in Appendix 3 cover the period 2016-2020 and raises questions as to what engagement with key stakeholders has taken place since 2020.</p> <p>Paragraph 1.3 refers to the Paddock Wood Infrastructure Framework 2024 but not aware of this document, which should be made available.</p> <p>The IDP does not reference the housing trajectory but there needs to be a read across between the two and what infrastructure trigger points there are in the trajectory.</p> <p>The IDP ‘timing’ is considered in 5 year tranches but there are no details provided within these and they do not relate to the housing trajectory.</p> <p>Prioritisation of infrastructure IDP is not explicit about timing of infrastructure delivery required for development to commence let alone its completion.</p> <p>Identified risks Various infrastructure delivery risks should be considered accumulatively rather than just individually.</p> <ul style="list-style-type: none"><li>- High risk - the IDP and IDS contain many blank sections including unstated</li></ul>	<p>Green Infrastructure is included in the IDP in Theme 8 pg 109 onwards, and at the brough Wide section pg 127.</p> <p>The Council has engaged throughout the production of the Local Plan which is set out in paras 2.23 - 2.31, and an update to the engagement on specific infrastructure themes has been included throughout the IDP.</p> <p>The reference to the Paddock Wood Infrastructure Framework 2024 and the Paddock Wood Specific Delivery Strategy is a drafting error and this in fact is incorporated within the <u>Strategic Sites Masterplanning Addendum</u> (page 30 onwards). A Strategic Infrastructure table is also incorporated within the updated <u>Policy SS1</u>, which also sets out the required infrastructure specific to PW to accommodate the planned growth.</p> <p>The IDP sets out the timeframes for delivery as short medium and long-term which is common practice in adopted Local Plans.</p> <p>The Council proposes to form a PWeC Delivery Board which will oversee delivery phases of the strategic development subject of STR/SS 1. The delivery board will be the opportunity to formulate a more detailed infrastructure</p>	<p>Yes, I wish to participate at the examination hearing session - 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 twell as the Local Plan, masterplanning, infrastructure delivery and funding uncertainties that still remain.</p>

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							<p>funding streams, which would suggest they should have a ‘high’ risk but there is no risk attached to them. Large infrastructure items where the costs are ‘TBC’ should also be classified as high risk.</p> <ul style="list-style-type: none"><li>- Moderate risk – no examples are provided of what this means and any infrastructure project could be classified as meeting this definition.</li><li>- Low risk – query how ‘funding in place’ and ‘political and community support’ have been used to assess infrastructure in the IDP, particularly how it has been applied to infrastructure in and around Paddock Wood.</li></ul> <p>Timing The basic approach to complexity of timing, funding and delivery does not take the Local Plan any further in demonstrating that the development strategy at Paddock Wood is deliverable. Would refer to the latest Lichfields ‘Start to Finish’ report that concludes for 2,000+ dwelling schemes the mean years from validation of the first planning application to first dwelling completion is 6.6 years.</p> <p>Costs As housing trajectory expects 75% of development proposed for PWeC to be delivered within next 10-year period, this is not so far into the future to determine infrastructure requirements. If TWBC is uncertain what is required, costs or whether it can be delivered the IDP should clearer about this.</p> <p>Not aware of any evidence been provided on how infrastructure costs have been calculated and verified by independent cost consultant.</p> <p>IDS Borough Wide and Cross Boundary Not possible to ascertain the difference between many of the borough wide and cross boundary entries and entries specifically for Paddock Wood Strategic Sites.</p> <p>It is unclear which developers are responsible for the funding of infrastructure</p>	<p>programme which can be overseen by members of the board who will include TWBC, developers and members of the Parish and Town Councils.</p> <p>Para 2.39 of the IDP states - The detailed costs for infrastructure will be fully considered at the planning application stage; therefore, figures contained within the schedule of this IDP are generally to be considered as being indicative and recognised as subject to change. This IDP, therefore, is intended to be a document that is regularly updated given the uncertainty and fluid nature of planning for infrastructure and is reflected in it being termed a ‘Live Document’ this will include reviewing the risk profiling of certain infrastructure.</p> <p>The IDP and Viability appraisal [PS_106] clearly set out the infrastructure needed to support the development. The costs at this stage will always be high level, however have been informed by consultants who have used cost estimates from statutory consultee evidence or from experience of similar development projects elsewhere. As developments progress these costs will be refined.</p> <p>The points regarding clarity of the document are noted and can be address if required through the main modifications process.</p> <p>In regard to sport and recreation, the council also met with the parish and town council representatives and ward councillors to discuss the delivery and uplift of existing and proposed sports facilities at Paddock Wood and in east Capel. The meeting was constructive and informative. The Eastlands site is not available</p>	

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							<p>i.e. are developers in other local authority areas contributing and within TWBC which developers are responsible for making contributions.</p> <ul style="list-style-type: none"><li>- It is unclear how funding for ‘Travel Planning across the Borough including Strategic Sites’ is divided across the Strategic Sites and particularly for Paddock Wood.</li><li>- Colts Hill Bypass should be included in the Borough Wide Infrastructure section due to the fact it is not benefiting Paddock Wood and is instead benefitting Colts Hill and other areas of the Borough in the South. Developers in Paddock Wood should not be solely responsible for funding this piece of infrastructure.</li><li>- Under buses, entries indicated for Paddock Wood do not have a cost estimate yet funding is identified.</li><li>- As the strategy for the Local Plan and Paddock Wood relies on a large modal shift pedestrians and cyclists projects should be listed as critical not highly desirable.</li><li>- Note that the Upgrade Hop Pickers Line as no estimate despite this being a key sustainable link required in Paddock Wood.</li></ul> <p>Paddock Wood and East Capel Transport – Walking and Cycling</p> <ul style="list-style-type: none"><li>- LCWIP phase 2 and low traffic neighbourhoods – question why these are not included in the Strategic Sites and Masterplanning document, given they are critical to the sustainability of the developments and achieving modal shift. Seek clarity on the amount of funding assumed to come from Strategic Site developers and how much is secured by DfT</li><li>- Pedestrian and cycle improvements – there is no indication of prioritisation, funding or who will deliver these</li></ul> <p>Transport – Bus</p> <ul style="list-style-type: none"><li>- Not possible to make sense of the delivery strategy for bus infrastructure as priority assessment for the various projects range widely</li></ul> <p>Transport – highways</p> <ul style="list-style-type: none"><li>- A228 Colts Hill/Badsell Road – there is no breakdown of KCC S106 funding and</li></ul>	<p>for a sports hub, and the Council strategy is to apportion contributions towards existing facilities to upgrade them. How the S106 contributions are apportioned will be subject to ongoing discussions with the various stakeholders through the delivery board.</p>	

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							<p>what is required from developers. Costs should be shared with developers in other area which will benefit from this infrastructure.</p> <ul style="list-style-type: none"><li>- Remainder of section has lot of missing information</li></ul> <p>Education – primary</p> <ul style="list-style-type: none"><li>- Question why two primary schools are needed in addition to that agree for the Persimmon site. One larger primary school in the west would be better, enabling better staffing, reduced management costs and greater flexibility of provision.</li><li>- The IDS does not breakdown the costs between KCC and the developers.</li></ul> <p>Education – secondary</p> <ul style="list-style-type: none"><li>- IDS appears to conflict with the revised Policy STR/SS 1 and it is unclear what is being costed in the IDS and what the cost of the Mascalls expansion and cost of new secondary school is. Also unclear what the funding split between developers and KCC is.</li></ul> <p>Water – Wastewater</p> <ul style="list-style-type: none"><li>- IDP states land has been safeguarded for an extension to the existing sewage treatment works in Paddock Wood, but Town Council understands this land has been sold to another party and is no longer available for expansion.</li><li>- Delivery of increased capacity at the Paddock Wood WWTW is a showstopper issue for growth. This has not been fully considered in terms of phasing of growth or the housing trajectory.</li><li>- If additional wastewater capacity required is not yet known how can a cost estimate be provided. In any case this estimate seems extremely low and does not consider potential requirement for more costly new wastewater treatment works facility. Also unclear how cost of safeguarded land has been factored into the IDP and Viability Study.</li></ul> <p>Water – Flood Risk</p> <ul style="list-style-type: none"><li>- Paras 3.155 – 3.159 indicates the updated modelling for the SFRA has superseded previous study undertaken by KCC, therefore, unclear where this leaves the status of this evidence base for flood risk and mitigation.</li></ul>		

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							<ul style="list-style-type: none"> <li>- Para 3.156 refers to number of smaller flood mitigation projects but provides no detail of these or how they might link with any new proposed flood mitigation measures for the strategic development at Paddock Wood.</li> <li>- Para 3.158 - the IDP provides no further information or explanation on TWBC claims that flood risk can be managed by on site mitigation.</li> <li>- The IDS provides no breakdown of costs for the flood risk mitigation measures. It is also unclear what some of the measures involve and where they are planned to be located. The IDS also does not include the proposed Wetland Park.</li> </ul> <p>Sport and Recreation The Town Council convened a meeting in October 2024 with sports teams in the town to discuss the Local Plan and its proposals. Minutes of meeting submitted as Appendix to this representation, but key points included:</p> <ul style="list-style-type: none"> <li>- Sport Hub greatly needed</li> <li>- Want to see hub on Eastlands</li> <li>- Opposition from group for second athletics track on Mascall's grounds. Examples of lack of cooperation between Academy Trust and other bodies. Funding for expansion of tracks on exiting site is far less than reprovision on school grounds.</li> <li>- Lack of suitable pitches to expand and club house for after match social gatherings</li> </ul> <p>The evidence base for the open space and recreation requirements is out of date with the study dating from 2017. Needs in Paddock Wood have changed considerably since then with additional 1,150 homes completed. IDP indicates that amount of open space (overall and by typology) will be addressed through allocations in the Local Plan but this is not set out for Paddock Wood.</p> <p>Public Realm, Art and Culture IDP includes no projects for Paddock Wood despite critical importance to create sense of place.</p>		
NEBD45-3	Mr Jonathan Easteal				PS_105		<b>Legal compliance and soundness not stated</b>	The IDP sets out the timeframes for delivery as short medium and	Not stated



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							<p><b>The Infrastructure Delivery Plan (IDP) is too vague.</b></p> <ul style="list-style-type: none"><li>There is mention of phasing, or what PW can be clear of having and when that would be.</li><li>Not enough detail on infrastructure that would be forthcoming <i>[TWBC: for more detail see comments in relation to PS_095 – Revised wording for Policy STR/SS 1 and PS_098 – Sequential Test Action Note]</i>.</li><li>The details on the costs of infrastructure improvements are not clear enough. Only “indicative costs” have been given but more concrete costs are now needed.</li></ul> <p><b>Waste Treatment plants:</b></p> <ul style="list-style-type: none"><li>There is no clarity on how enhanced waste treatment would work if developments are approved</li><li>No land has been identified as available for a new plant and no detail is given as to where a new plan needs to be.</li><li>TWBC refers only to “slight expansion” being needed but this would not be enough given the increased number of homes.</li></ul>	<p>long-term which is common practice in adopted Local Plans.</p> <p>The Council proposes to form a PWeC Delivery Board which will oversee delivery phases of the strategic development subject of STR/SS 1. The delivery board will be the opportunity to formulate a more detailed infrastructure programme which can be overseen by members of the board who will include TWBC, developers and members of the Parish and Town Councils.</p> <p>The IDP and Viability appraisal [PS_106] clearly set out the infrastructure needed to support the development. The costs at this stage will always be high level, however have been informed by consultants who have used cost estimates from statutory consultee evidence or from experience of similar development projects elsewhere. As developments progress these costs will be refined.</p> <p>Land is safeguarded as part of the masterplan update study [PS_046a Structure Plan] to the east of the Waste Water Treatment Works (WWTW), however Southern Water have stated that the current WWTW are capable of being expanded to meet the needs of the identified growth at PWeC without the need of the additional safeguarded land. Nevertheless, the Council considers that until the next SW Asset Management Plan is published covering 2025 – 2030 it is necessary to keep the safeguarded land in the plan.</p>	
NEBD46-4	Sue Lovell	Stop Overdevelopment of Paddock Wood			PS_105		<b>Legal compliance and soundness not stated</b>	The IDP sets out the timeframes for delivery as short medium and long-term which is common practice in adopted Local Plans.	Yes, I wish to participate at the examination hearing session

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							<p><b>The Infrastructure Delivery Plan (IDP) is too vague.</b></p> <ul style="list-style-type: none"><li>There is mention of 5-year and 10-year periods but no detail on phasing ie what PW can be clear of having and when that would be.</li><li>There is mention of the number of homes, but not enough detail on infrastructure that would be forthcoming <i>[TWBC: for more detail see comments in relation to PS_095 – Revised wording for Policy STR/SS 1 and PS_098 – Sequential Test Action Note]</i>.</li><li>The details on the costs of infrastructure improvements are not clear enough. Only “indicative costs” have been given but more concrete costs are now needed.</li></ul> <p><b>Waste Treatment plants:</b></p> <ul style="list-style-type: none"><li>There is no clarity on how enhanced waste treatment would work if developments are approved</li><li>No land has been identified as available for a new plant and no detail is given as to where a new plan needs to be.</li><li>TWBC refers only to “slight expansion” being needed but this would not be enough given the increased number of homes.</li></ul>	<p>The Council proposes to form a PWeC Delivery Board which will oversee delivery phases of the strategic development subject of STR/SS 1. The delivery board will be the opportunity to formulate a more detailed infrastructure programme which can be overseen by members of the board who will include TWBC, developers and members of the Parish and Town Councils.</p> <p>The IDP and Viability appraisal [PS_106] clearly set out the infrastructure needed to support the development. The costs at this stage will always be high level, however have been informed by consultants who have used cost estimates from statutory consultee evidence or from experience of similar development projects elsewhere. As developments progress these costs will be refined.</p> <p>Land is safeguarded as part of the masterplan update study [PS_046a Structure Plan] to the east of the Waste Water Treatment Works (WWTW), however Southern Water have stated that the current WWTW are capable of being expanded to meet the needs of the identified growth at PWeC without the need of the additional safeguarded land. Nevertheless, the Council considers that until the next SW Asset Management Plan is published covering 2025 – 2030 it is necessary to keep the safeguarded land in the plan.</p>	(No reasons stated)
NEBD49-1	Julies Davies	CPRE Kent			PS_105		<p><b>Legal compliance and soundness not stated</b></p> <p>It is difficult to understand what KCC and TMBC have planned to alleviate traffic hotspots on the A228 at Kippings Coss and Standings Cross.</p>	Comments noted. The strategy to help alleviate congestion issues at Kippings Cross on the A21 is to improve connections along the Pembury Road corridor and other associated routes. The highway modelling undertaken showed that	No, I do not wish to participate at the examination hearing session

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							<p>The proposals for roundabout improvements at Colts Hill bypass/Badsell Road and proposals for a pedestrian/cycle route from Paddock Wood to Tunbridge Wells are identified (at paragraph 3.21 at Table 3 (page 44) and Table 3 (page 42), respectively), but the construction of the section of the Colts Hill bypass that would connect to the roundabout at Badsell Road is not shown anywhere in the IDP as now being planned and no funding mechanism identified.</p> <p>Does the cost for Colts Hill/Badsell Road costs - £11.745m (identified in the PS105 Appendix 1 table) and £10.425 million (in PS 105 table 3 and PS106b Appendix 1) include the bypass. If so, the wording of the IDP should be made clearer.</p> <p>The cycle route between Tunbridge Wells and Paddock Wood is planned to follow the A228, including a narrow section south of Alders Road, and then use a minor road before crossing into TWBC-owned woodland, but there is at present no commitment from TWBC or KCC to use compulsory powers to create an off-road/behind hedge cycle route, making it unlikely. This cycle route will not be safe and pleasant enough to be used sufficiently to produce any measurable modal shift in travel between Paddock Wood and Tunbridge Wells unless it is entirely off-road/segregated.</p> <p>Modal shift relies on bus service improvements, which are uncertain in the current financial climate. Bus services need to operate between the towns with greater frequency that at present in the day time, later evening services, and Sunday services to achieve modal shift. Current estimates for modal shift at hotspot junctions may therefore not be valid.</p> <p>CPRE would like to know how funding for highway or public transport improvements will be secured, if the proposed modal shift</p>	<p>this helped to manage queueing at Kippings Cross in the future scenario with the proposed growth.</p> <p>The Colts Hill improvements include the Badsell Road roundabout and comprise the bypass which will increase capacity and will accommodate the traffic flows from the proposed growth.</p> <p>Cycle links to Tonbridge would be largely within the existing highway. This is outlined within the LCWIP and funding has been allocated within the viability assessment, although the exact amount is subject to refinement due to the high-level nature of this work. The wider comments made regarding modal shift have been noted and the Council is committed to providing enhanced sustainable network connections as outlined within the LCWIP and IDP.</p>	

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							<p>and highway mitigations fail to produce the anticipated vehicular traffic reductions.</p> <p>CPRE would like information about how the effects on the historic lanes of the High Weald will be monitored and what action would be taken, and how quickly, if a serious increase in traffic on them is detected.</p>		