

Submission 42-1

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

13.0 Updated housing land supply - Table 4 of the SLP

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

Looking at the housing distribution and reasoning, the TWBC plan seems to protect more affluent communities or those with PR resources.

It does not take account of the recent additions of 1,000 already placed in Paddock Wood.

Submission 42-2

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

3.2 Inspector's Initial Findings

Which part of the plan does your comment relate?

Paragraph

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

Lack of reference to the Paddock Wood Neighbourhood Plan, which is now policy relating to planning in Paddock Wood and should guide the Borough's planning proposals. The PWNP includes a range of objectives including infrastructure, sustainable development, maintaining the character of the town, creation of new sports facilities and creating a thriving town centre.

Lack of engagement with Council/residents of Paddock Wood, preventing the opportunity for residents to better understand the proposed changes and impact on Paddock Wood

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

No, I do not wish to participate at the examination hearings

Submission 42-3

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

3.1 The Local Plan allocation

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

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Lack of engagement with Council/residents of Paddock Wood, preventing the opportunity for residents to better understand the proposed changes and impact on Paddock Wood

Lack of reference to the Paddock Wood Neighbourhood Plan, which is now policy relating to planning in Paddock Wood and should guide the Borough's planning proposals. The PWNP includes a range of objectives including infrastructure, sustainable development, maintaining the character of the town, creation of new sports facilities and creating a thriving town centre.

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It does not appear to be written from experience of living in the Paddock Wood community.

This plan doesn't take as its starting point the additional 1,000 houses built recently in Paddock Wood. The recent extensive house building has quickly left the community with a situation that is exponentially worse off than before.

This is the current situation over the last 2 years, which you will hear from Paddock Wood residents:

- An increase in flooding
- A lack of suitable health care provision
- A lack of school places

- Closure of the police station
- An increase in anti-social behaviour and crime
- An increase in traffic congestion and disruption
- Inadequate public transport

The plan does not address the current situation, so adding nearly 4,000 more houses is not sustainable with the piecemeal plan set out by TWBC. The plan needs to address first the points raised in the Paddock Wood Neighbourhood plan on flooding, infrastructure, health care and education, for example.

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

Paddock Wood's experience is of the recent 1,000 new homes is that TWBC does not put infrastructure first.

The TWBC plan is at risk of leaving a legacy of flooding, fragmented communities and badly planned infrastructure.

Submission 42 –4

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

Infrastructure planning is lacking with the town centre not being included in the plan risking the increase in piecemeal and incoherent development of this area rather than creating a thriving centre encouraging social interaction and community cohesion with key facilities.

Submission 42-5

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

5.0 Transport related matters

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

This plan does not bear relation to the Paddock Wood Neighbourhood plan, so does not fulfil its legislative responsibility to consult meaningfully with the community.

It does not appear to be written with experience of holistic planning, levelling up communities, building for the long term

Submission 42-6

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

8.0 Overview and Conclusions

What is the reference number?

8.1 c

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

Given the flood plan used is out of date (see updated EA map), it is incorrect to say that Paddock Wood can accommodate the additional houses.

The plan does not take into account the 1,000 recent new homes and the run off from houses in other areas that affect Paddock Wood down stream.

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Use an up to date EA map.

Submission 42-7

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Paragraph

What is the reference number?

4.17

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

Flood management needs to be based on the recent revisions in the flood zones and flood risk areas in Paddock Wood, as the plan is based on 2018 flood data which is out of date and does not include either sequential or exception tests to look at the wider impact of each development.

The recent developments used Rhoden culverts under the railway line to drain off water and they are currently full - recent photos of Lucks Lane attached. Further developments along Queens Street proposed on flood plains will inevitably cause further flooding.

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Use an up to date flood map -

Refer to the change in flood zones on the EA website.

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

There is a lack of engagement with Council/residents of Paddock Wood, preventing the opportunity for residents to better understand the proposed changes and impact on Paddock Wood

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

No, I do not wish to participate at the examination hearings

Submission 42-8

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Paragraph

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

This plan does not bear relation to the Paddock Wood Neighbourhood plan, so does not fulfil its legislative responsibility to consult meaningfully with the community.

It does not appear to be written with experience of holistic planning, levelling up communities, building for the long term with an understanding of infrastructure, flood management and public service provision. It is a piecemeal plan with a lack of understanding of the current situation in Paddock Wood.

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

This plan doesn't take as its starting point the additional 1,000 houses built recently in Paddock Wood. The recent extensive house building has quickly left the community with a situation that is exponentially worse off than before.

This is the current situation over the last 2 years, which you will hear from Paddock Wood residents:

- An increase in flooding
- A lack of suitable health care provision
- A lack of school places
- Closure of the police station
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- An increase in traffic congestion and disruption

- Inadequate public transport

The plan does not address the current situation, so adding nearly 4,000 more houses is not sustainable with the piecemeal plan set out by TWBC. The plan needs to address first the points raised in the Paddock Wood Neighbourhood plan on flooding, infrastructure, health care and education, for example.

Submission 42-9

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Paragraph

What is the reference number?

4.58

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

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Lack of reference to the Paddock Wood Neighbourhood Plan, which is now policy relating to planning in Paddock Wood and should guide the Borough's planning proposals. The PWNP includes a range of objectives including new sports facilities

Submission 42-10

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

11.0 Housing need and supply

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

2023 changes to the National Planning Policy Framework are relevant in that the government changed the targets stating that fewer houses could be built. NPPF Para 60/61 refers to building for the local area housing needs, but we know that Persimmon & Berkeley Homes have worked with London Boroughs to move residents out of London. The price of other accommodation is too high for local people who are being priced out of the market. Housing need and provision should be specifically allocated for local people only.

Submission 42-11

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

5.0 Transport related matters

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Highways proposals are limited but the proposal for restriction of traffic movement over the bridge in Paddock Wood are not well thought out and will increase traffic in residential areas of Paddock Wood and single track lanes on the outskirts of the town. This is an important route for travel north/south in PW.

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

Highways proposals are limited but the proposal for restriction of traffic movement over the bridge in Paddock Wood are not well thought out and will increase traffic in residential areas of Paddock Wood and single track lanes on the outskirts of the town. This is an important route for travel north/south in PW.

Lucks and Wagon Lanes are single track with hair-pin bends. Queens Street also has two way traffic challenges.