


From: 
To: [Local Plan \(TWBC\)](#)
Subject: Public Consultation on the new local Plan ref STR/SS1
Date: 26 February 2024 22:58:34

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Dear Sir/Madam

Development and Infrastructure

Whilst TWBC appear to acknowledge their development constraints through a combination of Greenbelt and severe flood risk (s3.2) there appears to lack of evidence suggesting working together with neighbouring LA's to deliver development targets in a suitable manner which satisfies –

- Sufficient local infrastructure (town centre, doctors surgery, transport links)
- Demand for where people wish to live.
- Flood zone 1 with additional water/sewage discharge not causing problems to existing buildings/developments down stream.

Development in Paddock Wood fails on each of the above as detailed sections (S6.2, S6.6, s11.1-11.23). Further we understand private homes are selling slowly and London councils are relocating people to Paddock Wood – why? Clearly private owners are put off by the flood risk. Why aren't London councils seeking to move residents to better suited property in less populated parts of the country which have the infrastructure to support them. Local people's lack of demand weakens the argument there is a housing stock shortage in this area.

Understand there are issues of rising damp in some new buildings – this is not a builder issue but an example of unsuitability of the ground.

Clearly grown up thinking is required to resolve the housing shortage with possibly all South Eastern LA's working together to find areas which fulfil the points above. Possibly a more spaced out development to ease the impact (i.e. building more homes in all villages across SE England rather than some bearing the brunt). To date (per S8.4) TWBC has failed to consider this approach or looking at alternatives within its own boundaries for Greenbelt reallocation.

NOT MENTIONED in the report is the 37% increase in expected rainfall brought about by global warming and the impact this will have on the existing infrastructure never mind new homes. No mention has been made of the rainwater run off from Brenchley and Matfield and its effect to Paddock Wood and developments down stream.

Paddock Wood Infrastructure – highlighted in the report S6.6. Paddock Wood town centre is not part of the Paddock Wood Structure Plan, meaning present facilities are expected to cope with additional homes proposed. Aside lack of basic amenities (doctors – Brenchley and Paddock Wood full), without improvement this creates dormitory settlements with associated traffic issues.
Flooding

In reference to S12.2 – agree and add

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No mention of how existing Zone 3 properties South of the railway and North – Lucks and Waggon Lane plus Queen Street flood risk will mitigated. TWBC proposals do not take into account the 37% additional rainfall from Brenchley, Matfield and development either. Without further development is widely known of sewage problems in Warrington Road but perhaps less so Queen Street which too have issues of sewage coming into homes and at times of high rainfall drains overflowing and not being able to flush toilets. Sewage water frequently sprays from the plant at the Lucks Lane plant near Queen Street as far as the bottom of my garden (September Cottage).

If it is impossible to increase sewage capacity (s11.4 – S11.6) and already services are stretched how can further development be considered? The Redrow/Persimmon (S12.10) fails as the solution to discharge treated sewage (S12.15 and S12.16 along with other water) into East Rhoden stream meets the following issues –

Culvert under the railway line (East Rhoden Stream) insufficient capacity and if this is improved just pushes the problem onto Queen Street and down stream properties and villages. There is no mention of realistic solutions to deal with this – even before the 37% increase of rainwater (as mentioned above).

Increase of Traffic

Section 11.10 mentions reduced budget for Colts Hill traffic improvement and Section 11.15 – 11.20 for Maidstone Road etc however I wish to make additional observations –

Today at peak times there are traffic jams from Matfield to join A21 – which will become worse.

How is Colts Hill (already at capacity) to cope with additional Paddock Wood traffic

As a requirement to develop Kings Hill a single funnel system was designed to ensure additional traffic entered and left through the improved by-pass so reducing the impact to surrounding villages. Why is this is not the case for Paddock Wood.

More locally, the new developments have caused significant increased use of the lanes north of Paddock Wood (Lucks Lane, Queen Street and Waggon Lane) as rat runs. This is evidenced by the condition of the verges. It is now dangerous to walk at peak times on these single track roads – a problem which will only become worse with additional building (and the Swatlands development). Home owners are becoming trapped in their own homes! This is a contradiction of green lanes policy. Why should existing residents have to suffer increased noise danger and damage to their homes (old homes, historic properties without foundations) risk structural issues as a result of this. My property [REDACTED] shakes when lorries pass by.

Traffic speeds are excessive and lorries pay no heed to the access restriction signs

Lucks and Wagon Lanes are single track with hair-pin bends. Only a matter of time before there will be fatalities. Why aren't lessons being learnt from what has happened in Dundale Road.

Existing communities broken.

Solutions –

- Traffic restrictions from the new developments which prevent using Queen Street – funnelling traffic directly to the Badsell Road. Dualling of A228 to Hop Farm roundabout.

- Blocking up Lucks and Waggon Lanes and/or speed bumps and maximum width bollards.
- Blocking up Queen Street and Willow Lane railway bridges to all but emergency vehicles and bicycles.

Other Points

S5.11 – TWBC agrees the local plan is not adequate otherwise there would not be a review at 5 years. The PWTC report highlights some of the inadequacies. Rather than waste resource in 5-years making amendments, why not look prepare something fit for purpose today.

No mention is made of the impact to hedgerows and displaced wildlife. Why are the council continuing with the bulldozer to the countryside policy when government policy is to look at brownfield sites. Some of the hedgerows in Paddock Wood are in excess of 100 years old with mature trees and other hedgerow wild life.

Below are Frank's comments which are referenced to the plan as well – Please find below my comments relating to the Paddock Wood Town Council Representations report issued in February 2025.

For ease of reference I have made my observations against the specific paragraphs in the report:-

1.2 I was completely unaware of the Consultation process until this week, in addition I have found the process of finding the documents reference in the report to be very difficult

2.2 There has been no attempts made to consult with the electorate.

2.11 There are statement made in documents that require some explanation for an ordinary member of the public e.g. what is "active travel" as stated in the Neighbourhood Plan's Vision and Objectives, "Through sustainable design and the promotion of active travel, Paddock Wood will be future-proofed, responding proactively to the challenges posed by climate change."

4.2 In the NPPF Changes (2023) section reference is made to "local authorities now have greater flexibility". If this is indeed the case shouldn't the specific challenges facing Paddock Wood of flooding carry additional weight? The problems of a sewage system working at almost full capacity will only be made worse by the additional dwellings and the existing problems of a very high water table.

11.3 Refers to the need to provide a Sewage Works Upgrade. Shouldn't this be done before and new dwellings are added to what is already considered to be an overloaded system? There is already considerable bad press about the sewage in the Medway and there are a number of areas where we have seen sewage not being handled correctly. This must be of great concern when Southern Water have confirmed the problems with the treatment works being at capacity.

11.12 Health Provision is already a problem before the new dwellings are built. At least two of the local surgeries are not open for new patients.

11.14 There is insufficient capacity in the existing Cemeteries - again this is a problem associated with the high water levels.

11.15 The lack of an integrated approach means that amenities require access to private transport for access. There needs to be a more joined up approach to ensure that all members of the community have access to sports and leisure facilities.

11.16 As a resident of Lucks Lane I am concerned that the Lucks Lane junction with Maidstone Road is to widened as part of the development in Lucks Lane. I am sure that this will only increase the number of vehicles using Lucks Lane, despite the existing weight restriction. I also fear that this will

encourage higher speeds on Maidstone Road.

11.21 As a resident of Lucks Lane I am further concerned that the permitted building work will increase the problems that already exist in relation to water overflowing onto the road at times of high rainfall.

12.10 The Redrow and Persimmon development at Queen Street talks about the need to develop a new sewage works that will deposit a minimum 50,000 litres a day into Rhoden Stream. As far as I am aware there have been no published plans as to the measures that will be put in place to reduce the risks associated with this plan.

It seems to me that Paddock Wood is bearing a disproportionate burden of the development that is being planned for Tunbridge Wells. Whilst at the same time very specific geographic issues that should limit its suitability and use.

Regards

Josh Kilby

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