



**Revised Development Strategy to the Tunbridge Wells Submission  
Local Plan February 2024.**

**KEEPKENT.GREEN AND GOLDEN GREEN RESIDENTS  
ASSOCIATION**

**Consultation on Revised Tunbridge Wells Borough Council Local Plan**

**Introduction**

**KeepKent.Green welcomes the recommendation of the Permanent Removal of Tudeley Garden Village (TGV) Policy STR/SS3 from the Local Plan.**

**It is encouraging that common sense has prevailed with the removal of this policy.**

**Despite 1000's of initial objections to this policy at Reg18 and 19 public consultations, it is disappointing that TWBC has continued to produce reams of new evidence to try and justify TGV despite the thorough examinations held by the Secretary of State appointed Inspector Matthew Birkinshaw it has taken TWBC 6 years to conclude that they couldn't produce the evidence the Reg 18&19 consultations and the Inspector required in order to prove this policy was Sound and Justified.**

It has been over 2 years since the Examination into the Local Plan began, we are still concerned that the decision makers continue to ignore TMBC, Developers, CPRE , local residents feedback and objections,

TWBC obsession to follow an un justified Garden Village principles regardless of the cost and destruction of our towns and villages.

The process of understanding the Local Plan is a matter of navigating through 100's of lengthy documents, 500+ mb of data and 10,000+ pages of documents.

Understanding the intertwined nature of the documents for local residents without any training or experience of Town and Country Planning Laws is a challenge, and therefore difficult to conform to the expressed format of addressing policy. This submission will be more of a general assessment of the Revised Local Plan.

TWBC appear to have focussed on those matters raised by the Inspector, rather than reexamine alternative sites, strategies, and policies, "Shoehorning" existing sites previously identified with all their hopes of nearly 50% of their housing supply from Policy STR/SS1-Strategic Growth at Paddock Wood and East Capel a similar policy was adopted with TGV why can't the housing requirement become more balanced and more evenly distributed over the borough rather than large developments upon the Borough's borders?

**STR/SS1**

This proposed strategy should Not be considered a 'Box Ticking Exercise' as without the required evidence relating to-

**A) Infrastructure:**

There are limited proposals within the revised local Plan that address the many concerns relating to improving roads, rail, buses, Doctors and Medical facilities, dentists, additional shops and leisure facilities.

Further Viability Details with up to date costings are necessary to evaluate the deliverability of the proposed infrastructure.

It appears that consultants have used a broad brush approach by increasing the original costing estimates from the IDP in 2021 by 15% TWBC has not provided an updated IDP at this stage therefore it is difficult to assess how major infrastructure provisions will be delivered, and funded.

Confirmation that sufficient on line sewerage provisions will be allocated prior to any further new development and assurances that recent capacity constraints that have led to a number of incidents have been addressed.

Colts Hill Bypass –

Within the infrastructure Plan it highlights that Colts Hill Bypass as a potential Bypass with associated cost of £5.8 million however within the previous LDP the Bypass was classified as critical with an estimated cost of £30 million funded by developers.

Further detail and clarification of the cost should be provided as it should be noted this Bypass has been an ambition for nearly 40 years, the local community are aware of the overrun on costs regarding the A21 dualling project between Tonbridge and Tunbridge Wells in recent years, with original estimated costs of £58million and completed costs in excess of £120 million . A costing of £5.8 million appears to be totally unrealistic.

## B) Flood Risk

Lack of evidence of definitive flood risk enhancement and flood betterment.

Despite concerns that have been highlighted within previous representations by many commentators at Reg 18,19 and the Inspector's Examinations the Council still continues to pursue Paddock Wood and East Capel as a major contributor to its growth strategy within the Plan, despite the well known and documented flooding issues, however it continues to fail to provide supportive

evidence that addresses a compliant flood risk strategy of which aligns with latest NPPF policies.

“Flood Betterment” has been promised by TWBC on the three strategic sites now under construction however in reality the sewerage system has been further over burdened and regularly overflows. Surface water flooding issues have increased significantly.

As proposed to develop upon a natural floodplain that has provided flood protection to many villages and towns that are situated outside the borough further cross borough collaboration is required providing quantitative analysis to provide communities the reassurance that the proposed development will not have any negative flooding implications outside the Borough.

Despite concerns and objections at the Regulation 18, Regulation 19 and throughout the Examination regarding the inadequate evidence and assessment of flood risk matters due to the extensive flood risk existing at Paddock Wood. These concerns still continue not to be addressed.

Previously within the original LDP a figure of £9million was allocated within the viability study to provide preventative flood mitigation, the revised viability study assumes a lower figure of £8.6million.

The revised LDP still assumes sizeable development in an area that has a long history of flooding, despite assumptions that development will not proceed within Flood Zone 2&3 areas, how will flood risk will be eliminated from the planned development sites.

### C) Green Belt

Further Substantial evidence required to support the removal of 148ha of productive agricultural Green Belt that can justify exceptional circumstances exemption .

It appears that TWBC has not approached the Inspector’s points regarding the need to fully evidence ‘exceptional circumstances’ with

an open mind and has sought to keep its original proposed development strategy intact as much as possible. Its overall conclusion is that:

“The overall findings of the review are that the conclusions in the original SA and SHELAA, that resulted in the sites identified as reasonable alternatives not being regarded as suitable for allocation, remain valid.”

TWBC has not addressed the cumulative harm of Green Belt release.

There are clearly many sites / reasonable alternatives that have the same or lower harm ratings than STR/SS1 which have not been proposed for allocation in the Local Plan however there is no clear reason given for not allocating these sites.

Confusingly the Council mentions that due to its change in development strategy in relation to strategic development at Tudeley and Paddock Wood that some original sites that were originally rejected for Green Belt contribution may be reconsidered and would be examined again as part of the immediate Local Plan review.

The last 2 years should have been the time to reexamine these sites to provide further evidence that the Council were exploring all options before deciding on the removal of such large areas of Green Belt.

There are many reasonable alternatives that have lower harm ratings than Paddock Wood & East Capel, a detailed alternative document from Save Capel provided to TWBC at Reg 19 stage, with further brownfield sites and alternative sites with lower harm ratings.

It would have been useful information for the Council to provide some commentary why some of these alternative sites have not been considered within this consultation.

## **D) Education Provision**

**More detail required regarding a definitive education provision.**

**Confirmation required- is Mascalls extension viable and does it have the support of the educational academy and the KCC and how is the expansion financed?**

**Details of how the additional infrastructure requirement will be funded as well as a timetable of delivery.**

**The provision for an alternative primary and secondary educational facility within Paddock Wood, further information and data should be provided with evidence of confirmation that the identified site will be suitably funded and will receive the required accreditation, and deliverability and approval by the educational authority.**

**Has the alternative educational provision undergone a flood sequential test, to ensure the schools sites are located in a safe and suitable area that is not at risk from flooding?**

**How would cycling from East Capel to Paddock Wood work**

## **E) Transport**

**The Council's work on modal shift and a move toward sustainable transport, fail to consider the lack of employment within Paddock Wood. It is considered that workers are likely to continue to rely on motor vehicles therefore questioning the overall sustainability policy.**

**The air pollution in Paddock Wood is high during rush hour in the morning and evening and there is no reference in the Plan that addresses the current situation.**

It is still not clear from the David Lock Masterplanning work what is meant by short, medium, or long term, what the associated funding costs are for each of these improvements or what the trigger points are for the delivery of each of the proposed improvements.

The proposed one way system relating to the railway bridge within central Paddock Wood appears to lack distinctive evidence that will improve the current traffic congestion.

## F) Viability

The LDP states “ Discussions are ongoing with consultants Dixon Searle regarding the revised viability appraisal work, however delivery of the infrastructure associated with Paddock wood & East Capel as set out in the David Lock Associates addendum paper is considered achievable.” This report lacks clarity and detail.

Why is the ongoing working report with Dixon Searle not included within this consultation? TWBC have had 2 years to provide further information and clarify and answer the initial questions/ concerns raised at Reg18 & 19.

Given that accurate viability figures are essential especially regarding Paddock Wood and East Capel developments as there are so many components /factors to consider it is concerning that finer details remain missing within the viability appraisal work.

**As per previous submissions KeepKent.Green continues to view the latest revision of the Local Plan to be too narrow, lacks important detail regarding-**

**Infrastructure- Further Viability Details,  
Confirmation that sufficient on line sewerage provisions will be allocated prior to any further new development and assurances that recent capacity constraints have been addressed**

**Flood risk , the partial removal of a natural floodplain  
Green Belt,  
Education, distribution of housing allocations and housing need.**

**KeepKent.Green previous representations / submissions relating to TWBC Local Plan are still valid and should be referred to by TWBC as part of this consultation going forward.**

**The proposed revisions to the Local Plan are not Positively Prepared, Not Justified or Effective or consistent with NPPF and therefore Unsound.**