

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)
NEBD9-7		Redrow and Persimmon	Judith Ashton	Judith Ashton Associates	PS_106(a-d)		<p>Legal compliance and soundness not stated</p> <p>The additional costs are noted, however, PS_106c is based upon 2532 dwellings which is the upper limit for the PWeC sites suggested in the TWBC housing trajectory (PS_107). As policy STR/SS 1 (PS_095) looks to deliver a minimum of 2450 dwellings, we suggest PS_106c should be calculated based on 2450 dwellings, not 2532 which is somewhat aspirational.</p> <p>This would further reduce the surplus / increase the deficit, such that we would suggest the apportionment of the A21 works at 63% needs to be fully explained. Given the growing costs being directed at a reduced number of dwellings, the overall project viability is beginning to get tight.</p> <p>This is exacerbated by the fact that the latest VA does not, unlike that produced for the SLP (CD 3.65), encompass the internal routes within the land east of Paddock Wood. There are also further off-site highways improvements and, between the two assessments, an increase in highways costs which need to be considered in assessing the viability.</p> <p>We ask the Council undertake further sensitivity testing to address our concerns and strengthen the evidence base.</p> <p>However, both Redrow and Persimmon agree the delivery of the growth around Paddock Wood can occur over the plan period provided the necessary strategic infrastructure is delivered.</p>	<p>The points regarding the number of dwellings to be delivered are based on the revised Table 4 which indicates a range of dwelling numbers. Policy STR/SS 1 has been reworded to state ‘approximately’ against the figures proposed, however the range to be delivered is between 2,380 – 2,532. The costs associated with the infrastructure are very much high level.</p> <p>TWBC understand that the financial viability of the development will be subject to change as applications are considered and as infrastructure is fully costed. The apportionment of the costs associated with the Pembury Road corridor are based on housing numbers on allocated development in the LP and the associated trips using the corridor.</p> <p>The points raised regarding sensitivity are noted and can be undertaken as part of the planning process should it be necessary.</p> <p>TWBC is glad that the developers Redrow and Persimmon agree that the delivery of the growth around Paddock Wood can occur over the plan period with the strategic infrastructure.</p>	Not stated.
NEBD14-1	Mr David Maher	Dandara South East Ltd			PS_106	[TWBC: as mentioned in the next column – Comment Summary]	<p>Legally Compliant and Sound</p> <p>Appendix 1 – Table 1B</p> <ul style="list-style-type: none">Dandara acknowledges the updated infrastructure costs, which amount to an increased £3.5 million.	Comments Noted. The updated viability assessment should be read in conjunction within the updated IDP (PS_105) to give a high-level analysis of the infrastructure requirements and costings at this point in time. This will be refined as part of the detailed	No, I do not wish to participate at the examination hearing session.

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)
							<ul style="list-style-type: none">The Viability Appraisal and Infrastructure Delivery Plan provide high-level cost assessments subject to future updates, as they are providing assumptions on costings for future projects at present time.Further consultations will occur at the application stage to refine project-specific obligations.Dandara reserves the right to comment further on obligations during the planning application process.	consideration of the planning applications for each of the development parcels. The Development Delivery Board will also play a role as the multi-stakeholder forum assisting in development delivery, including the necessary infrastructure.	
NEBD15-7	Louise Goldsmith	Capel Parish Council			PS_106		Legal compliance and soundness not stated CPC endorse the observations made by Save Capel. <i>[TWBC: see NEBD20-5 for the Save Capel's representation]</i>	This is noted.	Not stated.
NEBD18-4	Ms Chantal Brooks	Brenchley and Matfield PC			PS_106(a-d)		Unsound, legal compliance not stated <i>[TWBC: for additional context on this comment and further comments relating to viability, please see BMPC's comments on highways matters in table 6]</i> PS_106 shows that Paddock Wood developers are going to contribute 63% of the assumed £6m cost for the Pembury Road corridor improvements. Is there any provision for cost over-runs, and who would bear those additional costs? Are the developers limited to 63% of the £6m cost assumed, or 63% of the actual costs of the improvements?	The Viability Assessment is a high-level review of the costings associated with the individual infrastructure elements, many of which still require detailed design as the Strategic Development progresses. As such, it is possible that costings could alter in the future. However, their inclusion within the IDP provides the framework for what needs to be delivered. The 63% funding for the Pembury Road corridor is based upon highway modelling relative to the growth at PW. This could also alter if sufficiently justified through future planning applications (with other sources of funding for the corridor seeing a commensurate adjustment ensuring the scheme remains fully funded and deliverable.	Not stated.
NEBD20-5		Save Capel			PS_106(a-d)		Unsound, legal compliance not stated Save Capel (SC) notes that (para 1.1.7), DSP's instruction was focused on the impact to viability relating to highways and health facilities. <u>Cost Assumptions</u> <ul style="list-style-type: none">SC believes that the PWEC-related cost assumptions contained in Appendix I of the Viability Assessment	The Viability Assessment is a high-level review of the costings associated with the individual infrastructure elements, many of which still require detailed design as the Strategic Development progresses. As such, it is possible that costings could alter in the future, although this will be reviewed as the development	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

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)
							<p>severely understate actual costs by <u>£20-40 million</u> – both due to over-optimistic assumptions as well as missing items that should have been included.</p> <ul style="list-style-type: none">• The contingency assumptions in Appendix I of “3-5% of build cost” seem VERY low, especially at such an early stage, and 10%+ would be more appropriate for a development of this size and complexity which would add around £30m incremental costs.• SC also notes that the costs for both contingency and professional fees have gone down without explanation.• It should also be noted that there are a number of discrepancies between DSP’s viability assessment and the Infrastructure Delivery Plan (IDP).• SC has identified 8 missing projects which have an estimated cost of over <u>£6 million</u>, with estimated cost in parentheses where identified in the IDP:<ul style="list-style-type: none">i. “LCWIP Phase 2 cycling & pedestrian within existing PW town and low traffic neighbourhood network within existing PW town” (£4.05M)ii. “Paddock Wood East, NW, SW 3m shared cycleway/footway along internal link road” (TBC)iii. “New telecoms connections” (TBC)iv. “Increased capacity at A26 Woodgate Way / B2017 Tudeley Road roundabout” (£1.75M)”v. “Bellmouth widening at junction of B2017 and Hartlake Road” (£50k)vi. “Bus network enhancements for improvements between RTW / Paddock Wood / Pembury / Tonbridge” (TBC)vii. “Bus Gates at Five Oak Green and Colts Hill Village” (TBC)viii. “Pembury corridor: Signalisation at Sandroek Rd Junction” (£500k)• Increasing contingency costs and including the missing project costs	<p>progresses through the Development Delivery Board. The IDP provides the framework for what needs to be delivered in order to support the quantum of development envisaged.</p> <p>Dixon Searle Partnerships are the TWBC consultants which have undertaken the Addendum Update on the Local Plan Viability Assessment [PS_106 a- d] and have included the appropriate contingency based on their experience of dealing with such projects including the inclusion of contingency figures, the surplus figures as set out in the viability reports and deliverability of the scheme at Paddock Wood and land at east Capel including the delivery of infrastructure and affordable housing.</p>	<p>seek to make formal representations in any future hearings during which the issues raised in this representation are discussed.</p>

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)
							<p>would severely impact the financial viability of the plan and essentially eliminate the feasibility of 40% affordable housing under any scenario modelled by DSP.</p> <p><u>Updated findings</u></p> <ul style="list-style-type: none">• DSP report (para 3.1.4) indicates “very little variation” in viability results between December 2023 and August 2024, where the viability results show a 0.2% negative variance due to reduced housing at PWeC.• Despite this, SC notes that residential criteria show reduced surpluses and increased deficits compared to December 2023. £701k surplus over Benchmark Land Value (BLV) at £250k has turned into a £899k deficit.• SC considers DSP's optimistic stance problematic, noting worsened deficits and at-risk classifications since December 2023, casting doubt on the deliverability of the target of 40% affordable housing:<ul style="list-style-type: none">○ In PS_106c, Appendix II (Table 2), only 3 out of 8 scenarios deliver a surplus for 40% affordable housing target. DSP concedes that delivering 40% affordable housing is marginal or infeasible in most scenarios, especially with potential cost increases.○ The 0.2% reduction in margin tightens an already constrained plan with little room for variance, especially given the issues of maximising capacity at Mascalls school, flood risk, unclear infrastructure funding, and potential housing market slow-down. The residential housing data in Appendix II presented to the nearest £1 also gives a misleading sense of accuracy.• DSP’s positive surplus outliers are considered 'appropriate' base assumptions, which is problematic for meaningful sensitivity analysis.• DSP’s conclusion in para 3.1.7 on the viability of 40% affordable housing		

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)
							<p>being ‘within the realms of viability’ is not a confident prediction.</p> <ul style="list-style-type: none">Given the movements in assumed data over time (para v - ‘Notes and Limitations’ caveats), combined with the reduced margins and reduced buffers explained above, SC is concerned that the Plan’s viability is at risk. <p><u>Conclusion</u></p> <ul style="list-style-type: none">SC believes that the PWEC-related cost assumptions contained in Appendix I of the Viability Assessment severely understate actual costs by £30 million.SC has identified 8 projects >£6 million that have not been referenced in the Viability Assessment.SC would repeat its conclusion in its earlier Reg 19 representations that the Viability Assessment is rendered otiose due to the extent and nature of DSP’s caveats together with the highly changeable variables over time may cause the Local Plan’s objectives, and in particular the headline 40% affordable housing target, unachievable.The headline 40% affordable housing target that was already in deficit in most measures in the December 2023 viability assessment, are now rendered even worse and cast greater doubt on the chances of the affordable housing target being achieved.		
NEBD27-5		Crest Nicholson	Jane Piper	Lucid Planning	PS_106(a-d)		<p>Legal compliance and soundness not stated</p> <p>Amended Policy STR/SS 1 now looks to the land at PWec to deliver approximately 2,450 dwellings. Suggest that PS_106c should be calculated on the basis of 2,450 dwellings.</p> <p>The previous SoCG (September 2021) recognised that the nature of viability assessments are high level and that assumptions can change over time but should be noted Crest has not agreed the BLV of £250,000 per ha.</p>	<p>The points regarding the number of dwellings to be delivered are based on the revised Table 4 which indicates a range of dwelling numbers. Policy STR/SS 1 has been reworded to state ‘approximately’ against the figures proposed, however the range to be delivered is between 2,380 – 2,532. The costs associated with the infrastructure are very much high level.</p> <p>The point regarding the BLV is noted.</p> <p>TWBC understand that the financial viability of the development will be</p>	Not stated.

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)
							<p>Crest does, however, agree that the delivery of the growth around Paddock Wood and east Capel can occur over the plan period provided that the necessary strategic infrastructure is delivered and appropriate measures put in place to mitigate any impacts.</p> <p>Paragraph 2.47 recognises that the IDP is a ‘snapshot’ in time and that further discussions and liaison will take place with the various infrastructure providers to firm up the requirements, timescales, associated costs, etc. All these cost matters will have to be taken into account along with BLV when assessing viability of the proposals at the time of the application/agreeing the s106.</p> <p>Several items identified in PS_106b as attributable to the PWeC development are not in the PW section of appendix 1 of the viability assessment but rather the Borough Wide and Cross Boundary costs. This needs to be clearer if PWeC sites are paying for them</p> <ul style="list-style-type: none">- closure of Hartlake Road to through traffic- capacity increase at A26 Woodgate Way/B2017 Tudeley Road roundabout- capacity increase at A26/A21/A2014/Pembury Road (Vauxhall Roundabout)- capacity increase at A26 Woodgate Way/B2017 Tudeley Road roundabout) <p>There are some discrepancies between IDP and VA that need to be resolved:</p> <ul style="list-style-type: none">- Climate Change Adaptation - £2,000 per dwelling (Table 1A of VA Addendum) not in IDP- 3 Pitch Gypsy & Traveller Site - £270,000 (Table 1A of VA Addendum) not in IDP- Costs of proving for Part M4(2) - £1,411,699, Part M4(3) - £2,867,826, and BNG - £8,641,717 are in the VA but not the IDP	<p>subject to change as applications are considered and as infrastructure is fully costed. The apportionment of the costs associated with the Pembury Road corridor are based on housing numbers on allocated development in the LP and the associated trips using corridor.</p> <p>TWBC is glad that the developers Crest agree that the delivery of the growth around Paddock Wood can occur over the plan period with the strategic infrastructure.</p> <p>The matters identified – climate change adaptation, 3 pitch G&T site, and delivery of dwellings to Part M4(2) and Part M4(3) would not strictly be infrastructure that would be required to be included in the IDP, however the point is noted and will be considered at the Main Modifications stage.</p>	
NEBD39-7	Stephanie Holt-Castle	Kent County Council (KCC)			PS_106a, PS_106b		<p>Legal compliance and soundness not stated</p> <p><u>PS_106a Update to Viability Appraisal following completion of the Final IDP (August 2024)</u></p> <p>Highways and Transportation</p>	<p>Dixon Searle Partnerships are the TWBC consultants which have undertaken the Addendum Update on the Local Plan Viability Assessment</p>	Not stated.

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)
							<p><u>PS 106b Appendix I</u></p> <p><i>Table 1 Development Cost Assumptions (August 2024)</i> Contingency build costs are listed with 3% re housing and 5% for other costs – 5% is not sufficient contingency for build costs of highway works. The County Council would expect 30% contingencies to be included.</p> <p><i>Table 1A Infrastructure Timings (August 2024)</i> The Viability Assessment includes highway schemes with only 63% of the cost listed. The County Council requests clarity why only 63% of the costs is listed and how the remaining 37% is to be funded.</p> <p>As with the IDP, the Viability Assessment includes £1,725,000 for a 'new bus route subsidy (five years)'. This amount does not tally with the total amount of subsidy needed as identified in the WSP bus studies prepared for TWBC to support the Revised Local Plan, namely PS_040 Public Transport Feasibility Study Review and PS_041 Paddock Wood Bus Service Options. The Viability Assessment should be updated to cover the costs of the intended service improvements.</p> <p>Table 1A includes 'Shuttle signal Bridge Paddock Wood High Street'. The signalisation and shuttle working over the railway bridge on the B2160 Maidstone Road, Paddock Wood is not supported by the County Council.</p> <p>Significant upgrades are included for Putlands Sports and Leisure Centre and this is an opportunity for land to be provided by Putlands to facilitate a cycleway along Mascalls Court Road.</p>	<p>[PS_106 a- d] and have included the appropriate contingency based on their experience of dealing with such projects.</p> <p>The apportionment of the costs associated with the Pembury Road corridor are based on housing numbers on allocated development in the LP and the associated trips using corridor. The 63% funding for the Pembury Road corridor is based upon highway modelling relative to the growth at PW. This could also alter if sufficiently justified through future planning applications (with other sources of funding for the corridor seeing a commensurate adjustment ensuring the scheme remains fully funded and deliverable.</p> <p>Shuttle signal Bridge Paddock Wood High Street can be removed from the proposed infrastructure schedule should KCC Highways not support the proposals.</p> <p>Delivery of necessary pedestrian and cycle route upgrades are proposed as part of the LCWIP 2.</p>	
NEBD42-7	Carol Williams	Paddock Wood Town Council	Troy Hayes	Troy Planning + Design	PS_106(a-d)		<p>Legally non-compliant and unsound</p> <p>Not easy to compare previous viability reports with the 2024 Addendum as new/different terminology for strategic transport projects is used.</p> <ul style="list-style-type: none">- unclear what has been added or removed from projects and reasons for cost changes.- unclear why four of the infrastructure items are indicated a '63% of the cost' which was	<p>The apportionment of the costs associated with the Pembury Road corridor are based on housing numbers on allocated development in the LP and the associated trips using corridor. The 63% funding for the Pembury Road corridor is based upon highway modelling relative to the growth at PW. This could also alter if sufficiently justified through future planning applications (with other</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</p>

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)
							<p>not the case in previous Viability Studies – are other developers from other areas contributing to these developments as well.</p> <ul style="list-style-type: none">- are other developers contributing to Colt’s Hill Bypass and highways changes in Paddock Wood. <p>Unclear why estimated cost for new health facility has been drastically reduced.</p> <p>Other points:</p> <ul style="list-style-type: none">- where have infrastructure costs come from and have they been verified by independent cost consultant.- where IDP has not indicated a cost estimate how have these missing estimates been factored into the Viability Study.- Garden Settlement Principles have not been included despite being a policy requirement.- Compensatory improvements to the Green Belt are a key measure that needs to be included in the Viability Study.- Cost of safeguarding land at Mascall’s Academy and at existing wastewater treatment works does not appear to be assessed.- Costs of delivering new wastewater treatment works does not appear to have been assessed in event it is required.- As the upgrade to the Hop Pickers Line has no estimate in the IDP how has this been included in the Viability Study estimates.	<p>sources of funding for the corridor seeing a commensurate adjustment ensuring the scheme remains fully funded and deliverable.</p> <p>The development at PWeC (STR/SS 1) is identified as being required to contribute towards the Colts Hill Bypass.</p> <p>The Health centre funding has been subject to discussions with the NHS who have outlined their requirements based on the reduced growth levels. Some of the funding already delivered through schemes at Paddock Wood, the remainder would be provided by contributions from the STR/SS 1 developments.</p> <p>WWTW site expansion is expected to be possible within the current site which has capacity for expansion to service the growth in PWeC (STR/SS1). Nevertheless, the land to the east is subject of safeguarding in the strategic allocation. The connection to the sewer network and delivery of treatment centre upgrades will be subject to separate agreements with the developers.</p> <p>The Hop Pickers line is an estimate based on previous cycleway delivery. It has been increased by 15% since the Viability estimates were considered as part of the SLP to account for inflation.</p>	<p>the scale of growth still proposed at Paddock Wood and given the well-known constraints and complexities of the area as well as the Local Plan, masterplanning, infrastructure delivery and funding uncertainties that still remain.</p>