

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
4-1	Chris Sutton				15 Proposed strategic policy revisions		<p>Respondent is a resident around the north western development parcel in Paddock Wood</p> <p>Their house was initially a small island excluded from the development parcel. Following Steve Baughan's suggestion in 2019, their house was offered to form part of the development area to enable a CPO and protect the value of the house.</p> <p>Now their house is excluded from the development area, as per revised map 28, without being informed by TWBC.</p> <p>The proposed plan no longer surrounds their house with housing developments, although, a new secondary school and access road is proposed to run by their house and garden.</p> <p>Respondent is concerned about the impact on the house value, character and ambience along with construction traffic, and would like their house to be reincluded into the development area.</p>	<p>The results for the updated Paddock Wood streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. This includes the land around the property mentioned by Chris Sutton, the majority of which is shown to fall within flood zone 2/3 through this modelling work.</p> <p>The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The reason for the proposal to safeguard land for a Secondary School in this location is that a small area of flood zone 1 land remains here which would be appropriate for the location of a school. The associated school land and playing fields can be located within flood zone 2/3 land with appropriate mitigation, and so this spatial position was considered appropriate during the Masterplanning work undertaken. This approach is discussed within the Masterplanning Addendum (PS_046).</p>
5-1	Rex Wakeling D.C.M.				4 Paddock Wood strategic growth		<p>Against 3000 houses being built in Paddock Wood</p> <p>Concerned about lack of infrastructure, loss of green belt and environmental impact.</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128), as well as the revised position within the Development Strategy Topic Paper Addendum (PA_054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors</p>

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								<p>Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>The Inspector also comments at para 52 in his Initial Findings letter (November 2022)...<i>that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth</i>".</p> <p>The growth would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
6-2	Linda Bingham				4 Paddock Wood strategic growth		<p>Strongly opposes the houses that are still planned in the Green Belt area in east Capel. Concerned with loss of food production, building on flood plains as well as the impact on transport infrastructure and GP surgeries in Tonbridge (respondent noted they are resident in the south of Tonbridge).</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128), as well as the revised position within the Development Strategy Topic Paper Addendum (PA_054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>In terms of the loss of agricultural land, the land classification has been assessed for all allocated sites as part of the SHEELA assessment process, and the Council has sought to minimise the allocation of Best and Most Versatile Agricultural Land for other uses. It is also important to highlight that the</p>

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								<p>Submission Local Plan 2021 (3.128) includes a policy to safeguard BMV Agricultural Land from development (Policy EN20), which was not contested by the Inspector in the 2022 Hearings.</p> <p>In terms of flooding, the results for the updated Paddock Wood streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>In terms of infrastructure, the growth would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS 046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
14-1	James Duffin				4.4 Flood risk and Housing	The first thing would be to reduce the number of houses built by a significant amount. All properties built in this area should be designed to limit the flood risk to neighbouring	Flood risk and Housing - Paragraph 4.17 with regard to 4.0 Paddock Wood strategic growth: Legally Non-Compliant/Unsound due to: Existing flood risk arises from three current housing developments. Land to the east of the town is on a flood plain unsuitable for further development.	With regard to flooding impacts, the three large scale consented housing developments under construction in Paddock Wood were all granted Planning Consent in 2018. Each of these schemes was the subject of detailed assessments of the impacts of development, detailed design and necessary mitigation measures (including any required flood mitigation/SUDS drainage schemes in

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						areas. A suggestion could be that the properties are raised up on stilts, so that the ground underneath them still allows water to drain and soak away. All paved areas should be made of porous materials, including roads, pathways and driveways, allowing the water to soak away naturally and not overload the drainage network	Proposals are as follows: Reduce the number of houses significantly. Design fit for flood mitigation on all new buildings, e.g. using stilt intervention Porous paved areas for soaking allowance	consultation with the Environment Agency and KCC (as Lead Local Flood Authority) which were secured by planning conditions and S106. In terms of the proposed Strategic Site allocations, further assessment and modelling work has been carried out for land at Paddock Wood and East Capel. The results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
15-1	James Duffin				4.6 Education infrastructure provision	Mascalls has enough land to expand to accommodate the housing growth, though a new school entrance or one way system with different entry and exit points may be worth considering due to the increased vehicular traffic (both cars and busses) attending the school. The land allocated for a second Primary School should be used as such. A second primary needs to be built to	Local primary and secondary schools are already at capacity from the three developments currently being built. Mascall's has enough land to expand to accommodate the growth for secondary education. A one way traffic system is worth considering to manage the increased traffic. A new primary school is needed to accommodate the growth.	the three large scale consented housing developments under construction in Paddock Wood were all granted Planning Consent in 2018. As part of these developments, a new 2FE primary school was to be delivered as part of the development at Mascalls Grange which would serve the growth provided by these consented developments. It is understood that KCC (as Education Authority) have recently actioned the purchase of this land in order to deliver the planned primary school and commence construction shortly. The Strategic Sites (Master planning) Addendum paper (PS 046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for

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						accommodate the growing needs of the town		Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS 046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS 046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum PS 054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.
16-2	Mike Martin	Liberal Democrats (Tunbridge Wells)			4.4 Flood risk and Housing		Paddock Wood strategic growth - Flood Risk Strongly support removal of sites in East Capel/West Paddock Wood, in Flood Zones 2 and 3 as already issues with increased surface run off and localised flooding in PW and extensive surface water flooding in East Capel part of proposal. General - affordable housing Urge TWBC to consider provision of much greater local needs for affordable housing within the overall scope of the plan.	In terms of flooding, further assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling

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								<p>data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>With regard to affordable housing, the Submission Local Plan 2021 (3.128) includes an Affordable Housing policy (H3) which requires new greenfield development to deliver a minimum of 40% as on site affordable housing. This is in-line with the requirements set out within the NPPF and provides an enhanced level of provision. This level of provision is continued for the Strategic Sites and Paddock Wood and East Capel and is also set out within the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum) PS 054).</p>
16-3	Mike Martin	Liberal Democrats (Tunbridge Wells)			4 Paddock Wood strategic growth		Paddock Wood strategic growth - lots of decisions to be made to make sure Paddock Wood community gets the infrastructure it requires- specifically primary healthcare provision, sports facilities and bus services. Urge TWBC to engage with Paddock Wood Town Council and Capel Parish Council to make sure their concerns are acted upon	<p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS 046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>Discussions with local councillors, Paddock Wood Town Council and Capel Parish Council have continued through the process of revising the Strategic Sites strategy following the Inspector's Initial comments. The Council has engaged with local stakeholders and has sought to reflect any views within the revised SS strategy.</p>
22-2	Petrina Lambert				4.4 Flood risk and Housing		The Environment Agency warned that Badsell Road, East Capel is at high risk of fluvial flooding, the same week climate change was stated to be higher than expected. TWBC appears to have considered this, but the NPPF states housing has to be future proof and the wider impact of building on flood land in East Capel should be considered.	Further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to

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								provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
24-1	Jose Hyatt-Twynam				4.4 Flood risk and Housing		The Local Plan's proposed development allocation is Legally Compliant and Sound in response to Flood Risk: Followed the recommendations of the Inspector - endorsed by NPPF, on allocating development in Flood Zone 2 and 3 unless less risks identified elsewhere.	The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
27-1	Dr Elizabeth Russell				5 Transport related matters	Serious consideration of public transport and safe walking routes in Paddock Wood. Look at	Transport related matters - legally compliant but unsound: Little/no public transport available. Will be more stretched with growth Solutions:	The Council has carefully considered public transport options as an integral part of the transport enhancement delivered through the Strategic development. Sustainable transport modes are a fundamental part of achieving a model shift for some trips away from the

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						pavements/cycle options etc. Discussions with Southeastern trains about services to to and from Paddock Wood. Discussions with bus companies about providing services.	Serious consideration of public transport and safe walking routes in Paddock Wood. Look at pavements/cycle options etc. Discussions with Southeastern trains about services to to and from Paddock Wood. Discussions with bus companies about providing services.	private car. As such, the Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents List), which formed part of the evidence for the Submission Local Plan 2021 (3.128) . This sets out the key routes and connections through Paddock Wood and the enhancements needed to improve their usability.
27-2	Dr Elizabeth Russell				4.4 Flood risk and Housing	More flood prevention and water flow management needs to be put in place before any further development is started.	<p>Flood Risk - legally compliant but unsound:</p> <ul style="list-style-type: none"> Flood risk - not sufficiently dealt with and a number of incorrect assumptions Lucks Lane and the surrounding fields are frequently flooded. Planned development will make this worse When Swatlands Farm development was approved, plans did not take into account - Paddock Wood Stream not maintained/cleared and needs regular maintenance to avoid flooding; ditch beside Lucks Cottage which is meant to go under the road but has collapsed; the culvert under Lucks Lane not sufficient to cope with a high volume of water. When there is heavy rain the centre of PW (near Waitrose) becomes flooded and spray from the roads goes into nearby houses Nowhere for heavy rainfall to flow to safely, made worse by recent new housing developments Already an overloaded sewage system- Southern Water do not currently have capacity for more houses <p>Solution: More flood prevention and water flow management needs to be put in place before any further development is started</p>	<p>The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The further flood assessments carried out also evaluate the areas to the north of Paddock Wood which are subject to river flooding from the Medway and Tiese rivers. The conclusions show that previously proposed employment allocations to the north of Paddock Wood would fall within Flood Zone 2/3 (based on upperend climate change modelling). This includes Keylands Farm and Swatlands Farm which have now been removed as allocations as part of the revised Strategic Sites strategy</p>

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								due to this flooding impact and in view of the Inspector's comments regarding development outside of flood zone 1. It is acknowledged that Swatlands Farm has benefitted from a grant of planning permission since the initial Local Plan hearings, although this was prior to the further flood assessment work having taken place.
27-3	Dr Elizabeth Russell				4.8 Overview and Conclusions		There is currently a huge pressure on GP surgeries which have closed applications for new patients. This needs to be recognised in the plan.	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
27-4	Dr Elizabeth Russell				4.5 Employment land - review of options	Reconsider the type of employment/businesses being considered. What is the actual need? How does this link physically and economically to Paddock Wood? Do not use land that already is water saturated for development. As mentioned in my comments re flooding.	<p>Employment land - legally compliant but unsound:</p> <ul style="list-style-type: none"> Land east of Transfesa (near Lucks Lane) is already prone to flooding and unsuitable for development Only type of employment being looked at is industrial/warehouse - unlikely to attract residents in PW due to high house prices etc., but may attract others from further away, increasing traffic in/around PW. Lucks Lane of particular concern (mainly single track with many bends) Also no evidence being shown that this type of site/use is needed - local warehouse/industrial sites in PW and Tonbridge have long term vacancies. Poor public transport and walking/cycling infrastructure, so people more likely to drive <p>Solutions:</p> <ul style="list-style-type: none"> Reconsider the type of employment/businesses - what is actual need? How does this link physically and economically to Paddock Wood? Do not use land that already is water saturated for development 	<p>The Employment Land Provision at Paddock Wood Paper (PS_045) sets out the context for the previous employment allocations within the Submission Local Plan and the basis for these allocations referring to the conclusion of the Economic Needs Study. The allocations have been re-considered as part of the revised Strategic Sites strategy due to the conclusions of the further flood assessments carried out. The conclusions show that previously proposed employment allocations to the north of Paddock Wood would fall within Flood Zone 2/3 (based on upperend climate change modelling). This includes Keylands Farm and Swatlands Farm which have now been removed as allocations as part of the revised Strategic Sites strategy due to this flooding impact and in view of the Inspector's comments regarding development outside of flood zone 1. The employment allocation now proposed to the East of Transfesa is largely outside of flood zones 2/3 and measures are capable of being introduced to ensure safe and suitable access as well as any necessary flood mitigations. The employment areas could comprise a range of uses focusing on B employment uses given the site context etc which is likely to be most suitable and would meet the borough need.</p> <p>The Council has carefully considered public transport options as an integral part of the</p>

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								transport enhancement delivered through the Strategic development. Sustainable transport modes are a fundamental part of achieving a model shift for some trips away from the private car. As such, the Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents List), which formed part of the evidence for the Submission Local Plan 2021 (3.128) . This sets out the key routes and connections through Paddock Wood and the enhancements needed to improve their usability.
28-2	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		12 Conclusions on preferred development strategy option		<p>Amended Plan is considered to be legally compliant but not sound in regard to section 12 - Conclusions on preferred development strategy options, in the regard to the following;</p> <p>CPRE welcome the proposed amendment to the Council's development strategy that would see the deletion of Tudeley and amendments at Paddock Wood and East Capel.</p> <p>However, think that housing numbers could be addressed, in part, by densities that reflect the urban nature in Paddock Wood and other sites - would like to see the housing numbers re-calculated by applying higher densities.</p> <p>TWBC should address the implications of the Section 245 Levelling-up and regeneration act and consider again housing allocations in the AONB.</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out clearing how the strategic growth could be delivered, particularly in terms of development parcels and spatial positioning. The DLA works assumes a density of around 32dph for a number of reasons including the width of the development parcels which is hampered by flood zones/landscaping or roads. Parking requirements within narrowing development parcels which is also a land hungry use, and also ensuring the development is appropriate and sympathetic to the edge of settlement positing, which will also form the transition to the countryside. As such, higher densities than those outlined are not suitable.</p> <p>In terms of the further allocations within the AONB, this is a matter for the future Local Plan review which will consider a development strategy to meet the remaining 5 year of the plan period.</p>
28-6	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		4.8 Overview and Conclusions		<p>Paddock Wood - legally compliant but unsound</p> <p>Welcomes the proposed amendment to address the flood risk issues. However, the reduction in housing numbers could be addressed, in part, by densities that reflect the nature of this urban extension.</p> <p>The Council should do a simple calculation on densities ranging from 60-120dph (for an urban neighbourhood) to see how far it goes in addressing the shortfall in terms of the 2100 homes that were to come forward within the Plan</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out clearing how the strategic growth could be delivered, particularly in terms of development parcels and spatial positioning. The DLA works assumes a density of around 32dph for a number of reasons including the width of the development parcels which is hampered by flood zones/landscaping or roads. Parking requirements within narrowing development parcels which is also a land hungry use, and also ensuring the development is appropriate</p>

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							period at Tudeley, and the 1000 lost as a means of addressing the flood risk at Paddock Wood.	and sympathetic to the edge of settlement positioning, which will also form the transition to the countryside. As such, higher densities than those outlined are not suitable.
28-7	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		4.4 Flood risk and Housing		<p>Paddock Wood housing - legally compliant but unsound</p> <p>Acknowledges the need to attenuate surface water as close to the source as possible, but objects to the reduction of housing density from 35dph to 30dph. It should be possible to align the objectives of controlling surface water and optimising land use to minimise the sacrifice of green field land in the Local Plan and its subsequent review.</p> <p>In relation to the TWLP/083, a note produced to the Inspector on densities, Paddock Wood and East Capel is currently green field land. However, it will no longer be green field once developed, and therefore densities should reflect those for urban neighbourhoods. That is 60-120dph, or even a suburban development of 40-60dph. It is unreasonable to consider the starting point for densities to be 35dph and a waste of land resources to allow urban sprawl at a mere 30dph.</p> <p>This has previously been raised by CPRE in the matter statements for Matter 2, Issue 1; Matter 3, Issue 1 (including specifically discussing Paddock Wood and East Capel); Matter 3, Issue 2; Matter 5, Issue 1.</p> <p>Before detailed work is undertaken, the Council should do a simple calculation based on densities ranging from 60-120dph to see how it goes towards addressing the shortfall in terms of the 2100 homes that were planned (within the Plan period) at Tudeley and the reduction of 1000 homes at Paddock Wood. If this demonstrates a substantially increased capacity for housing, then revisions to allocation yields should be made prior to the next stage of the plan making process.</p>	The Strategic Sites (Master planning) Addendum paper (PS_046) sets out clearing how the strategic growth could be delivered, particularly in terms of development parcels and spatial positioning. The DLA works assumes a density of around 32dph for a number of reasons including the width of the development parcels which is hampered by flood zones/landscaping or roads. Parking requirements within narrowing development parcels which is also a land hungry use, and also ensuring the development is appropriate and sympathetic to the edge of settlement positioning, which will also form the transition to the countryside. As such, higher densities than those outlined are not suitable.
29-1	Lloyd Lasade				4 Paddock Wood strategic growth	Build the sports hub, and leisure facilities as initially indicated, and in full. Deliver the infrastructure as detailed in the Paddock Wood Neighbourhood Plan. This will enable the proposed growth in residences to be achieved without reducing the	<p>Paddock Wood - not legally compliant/unsound</p> <p>The residents have shown clear support for the Paddock Wood NDP through the referendum. The proposed changes to the LP make no reference to the NDP, which has been ignored in the proposals to push ~50% of the borough's growth to Paddock Wood.</p> <p>It is unsound to remove green spaces, without replacing them with sport and leisure facilities. The new proposals which reduce or remove the sports hub that was planned is a typical bait and switch. The facilities for sport, leisure and social activities are either being reduced, removed or under invested in. Meanwhile more homes places increasing strain on the existing infrastructure.</p>	The Council considers appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						experience and available facilities for the existing residents.	To make the plan sound, the sports hub and leisure facilities as initially indicated will need to be built as well as the infrastructure detailed in the NDP. Paddock Wood could be developed for the benefit of all, but the current proposals will reduce the experience and available facilities for existing residents.	<p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p> <p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p>
30-1	Sarah Jagelman				4 Paddock Wood strategic growth		<p>Concerns about Paddock Wood making the Plan legally non-compliant and unsound:</p> <p>Poor infrastructure and amenities provisioned for GP surgeries, primary school, clean drinking water and defences despite being the tax payers See no benefits for the community with new developments</p>	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
31-1	Patricia Bewsey	Householder			4 Paddock Wood	Total infrastructure built and in place first. Not promised them	Paddock Wood - not legally compliant / unsound	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
					strategic growth	disbanded. Builders know they can't sell all these houses so flats and dubious social elements are added. Your plans or lack of the, are destroying lives for so many others who chose to move here.	<p>There is no police station and crime has escalated. There are permanent road closures trying to deal with water mains and sewage infrastructure which cannot cope with the existing expansion. GPs have closed patient lists. There is limited rail capacity for those wishing to commute. The shopping centre is limited with little parking.</p> <p>Surely Paddock Wood has had its quota of new housing. Tunbridge Wells is huge and Paddock Wood is being deluged with 50% of new housing.</p> <p>We were promised an extra school and an improved sports centre, which have been cancelled.</p> <p>Infrastructure needs to be build and in place first.</p>	education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS 046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
34-1	Sarah Jones on behalf of Capel Greenbelt Protection Society	Capel Greenbelt Protection Society	Sarah Jones	Trustee	2 Green Belt	The local plan should be changed in order that it is compliant with the NPPF with regard to the use of Green Belt for development. The NPPF states, brownfield sites and underutilised sites should be used for development before releasing land from Greenbelt therefore the 2 following sites that are both outside of Greenbelt; Site Reference: 144, Horsmonden and Site Reference: DPC3 Blantyre House (both sites totalling approx. 130 hectares), should both be included in the local plan for development.	<p>Green Belt / Paddock Wood and East Capel - legally compliant but unsound</p> <p>The NPPF states that Green Belt land should only be released under exceptional circumstances, as well as stating brownfield sites and underutilised land should be made use of first.</p> <p>The Inspector identified the magnitude of harm from the two largest Green Belt allocations is high and recommended TWBC perform an assessment of alternative sites that could be considered for development. TWBC carried out this assessment but only included sites that lie within the Green Belt, despite there being several sites of significant size within TWBC which are not in the Green Belt or AONB.</p> <p>These include site reference: 144, Horsmonden and site reference: DPC3, Blantyre House.</p> <p>Blantyre house was rejected in the SHELAA as being too small. This would not be the case if the whole extent of the land ownership was assessed, not just the prison buildings and immediate surroundings. The site was supported for development in the Goudhurst Neighbourhood Plan and is sustainably located in terms of its distance from Cranbrook and transport connections.</p> <p>Site 144 was rejected because it would be disproportionate to the size of the settlement with concern about landscape and heritage. This is not valid as the sites in East Capel are adjacent to listed buildings and the existing Limits to Built Development. Additionally, site 312 contains ancient woodland, a historic route and an AONB component part. Site 144 would not cause neighbouring towns to merge together and would not destroy additional Green Belt land to create transport links as it would use the existing road structure that serves Horsmonden.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS 054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p> <p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128), as well as the revised position within the Development Strategy Topic Paper Addendum (PS 054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p>

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							<p>Paddock Wood and the surrounding land is also prone to flooding which more development will not help. Sites 144 and DPC3 are not in a flood zone.</p> <p>The Local Plan should be changed to it is compliant with the NPPF with regard to the use of Green Belt land for development. Sites 144 and DPC3 should both be included for development.</p> <p>With respect to the purposes of the Green Belt, not limiting the amount of Green Belt land released will result in increased urban sprawl thereby eliminating the distinct boundary of Paddock Wood with its neighbouring conurbation. Furthermore, once land has been released from Green Belt, it cannot be returned and its ability to safeguard the countryside is lost, even if the purpose for the release is not for housing.</p>	In terms of Brownfield land, this has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83 . The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness.
35-1	Jeremy Thompson				4.8 Overview and Conclusions	Paddock Wood needs investment in infrastructure before any more building takes place.	<p>Paddock Wood infrastructure/services - legally compliant but unsound</p> <p>Paddock Wood no longer has a good range of services considering the population increase. Investment in infrastructure is required before any further building. Healthcare provision is at capacity with the dentists, doctors and chemists not accepting new patients.</p>	The growth would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
35-2	Jeremy Thompson				4.7 Sports and Leisure provision	The latest suggestions of building a swimming pool at Putlands, turning part of the rugby pitch over to a car park make no sense. Ever since the Athletics track was built we have flooding to the North of the site making the piece of land between the athletics track and Stace Cottages impassable during much of the winter. Any further construction in the area constrained by Putlands and Putlands Field will	<p>Paddock Wood sport and leisure provision - legally compliant and sound.</p> <p>However, the revised strategy is unsatisfactory. It does not reflect the reality of use in Paddock Wood or the aspirations of the community and PWTC as developed through the NDP. There has been little consultation with PWTC.</p> <p>Building a swimming pool at Putlands, and turning part of the rugby pitch to a car park doesn't make sense. There has been flooding north of the site since the athletics track was built, making the land between the track and Stace Cottages impassable during much of the winter. Further will exacerbate the flooding issues.</p> <p>Swimming pools are being closed in many areas. How will one be funded, and what costings have been done?</p>	<p>The Council considers appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p> <p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal</p>

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						exacerbate the flooding issues and is not acceptable.		(included within the Submission Local Plan), is no longer the right option. Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. The infrastructure would be funded by the Strategic growth which would be equalised across the development parcels to ensure strategic delivery at the point the infrastructure is necessary.
35-3	Jeremy Thompson				5 Transport related matters	We all accept that there is a climate change emergency and a need to reduce the use of fossil fuels. Building say a further 3035 new homes in Paddock Wood without investment in a robust, frequent and reliable public transport service is only going to add to global warming and considerable increased congestion on our roads. It already can take 45 minutes to get to Tunbridge Wells from Paddock Wood and the additional housing will only increase the problem.	Transport - legally compliant but unsound Public transport is almost non-existent, other than the railway. Paddock Wood is cut off from neighbouring towns if you wish to travel by bus. There is no chance of Paddock Wood residents attending venues in RTW unless travelling by private car, as the bus service ends before the shows do. Likewise with the rail service and Marlowe Theatre in Canterbury. We accept the need to reduce the use of fossil fuels. However, building 3035 homes in Paddock Wood without investment in a robust, frequent and reliable public transport is only going to contribute to climate change and increase the congestion issues. Paddock Wood has no night time economy, except for the two local pubs. Without improvement to local transport, older residents, who may not drive or have access to a car, will become increasingly isolated.	The Council has carefully considered public transport options as an integral part of the transport enhancement delivered through the Strategic development. Sustainable transport modes are a fundamental part of achieving a model shift for some trips away from the private car. As such, the Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents List), which formed part of the evidence for the Submission Local Plan 2021 (3.128) . This sets out the key routes and connections through Paddock Wood and the enhancements needed to improve their usability.
41-1	Richard Moor	Moor Investment Services Ltd			Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including	I think I have already answered this in sufficient detail above in that there appears to be a lot of the required liaison with the local Council that has been lacking in these changed proposals which as	Policy STR/SS 1: Legally non-compliant/unsound: Proposed changes put forward with little/no consultation with local people, high level decisions being made without local representation entirely wrong. No infrastructure improvements made through recent new development in Paddock Wood - water/sewage systems, town centre, medical services, road network, schools. Already at capacity. Infrastructure should come first.	Discussions with local councillors, Paddock Wood Town Council and Capel Parish Council have continued through the process of revising the Strategic Sites strategy following the Inspector's Initial comments. The Council has engaged with local stakeholders and has sought to reflect any views within the revised SS strategy.

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					land at east Capel	far as I can see, is a statutory requirement. This reeks of negligence. In the changes, there appears no consideration for the improved and expanded infrastructure required to service the new houses being built which I would have thought is common sense and should be a primary consideration rather than a 'nice to have' add-on at the end. Living in Chantlers Hill in Paddock Wood, we have witnessed the massive number of houses going up in Green Lane, Church Road and Badsell Road. We have no objections to the building of new houses in and around Paddock Wood as we understand the housing need in the South East BUT, having lived here for 30 years, there have been NO improvements to the medical services, NO improvements to the road network, NO improvements to the schools, NO improvements to the water and sewerage systems and NO improvements to the town centre which is in an extremely poor state. We find it incredible that all these houses are put	Much of new housing not going to local people and more starter homes needed.	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.

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						<p>up BEFORE any of these services are dealt with. What do the existing and new residents do in the meantime? Common sense would say that money should be spent on this first before the building starts but we all know where the money is, yes, it's in the building and sale of new residential houses. Another example of putting profit before welfare. In addition, and it has been apparent in the number of 'To Let' boards in evidence shortly after some of these properties are sold, they are being bought by landlords, probably with 'backhanders' to the developers so are not available to local people. I would also like to see more starter properties being built, rather than four and five bedroomed houses, so that young people have a chance of owning their own home and there being restrictions put in place to stop people buying the houses for investment purposes and then renting them out at extortionate rents for greed. Again, where is the morality in all this?</p>		
42-2	Jo Young	UniFida			4 Paddock Wood strategic growth		<p>Inspector's Initial Findings -legally non-compliant/unsound: Lack of reference to Paddock Wood Neighbourhood Plan, which includes a range of objectives - infrastructure,</p>	<p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							sustainable development, new sports facilities, local character and town centre Lack of engagement with Paddock Wood Town Council and residents	development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13). Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).
42-3	Jo Young	UniFida			6 Infrastructure	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: <ul style="list-style-type: none"> • 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 	Infrastructure - legally non-compliant/unsound: Lack of engagement with Paddock Wood Town Council (PWTC) and reference to Paddock Wood Neighbourhood Plan (range of objectives e.g. infrastructure, thriving town centre, sports facilities). TW Plan needs to address these. Plan does not take account of 1,000 recent new homes. Situation over last 2 years - increased flooding, lack of suitable health care provision and school places, increased anti-social behaviour/crime, increased traffic congestion, inadequate public transportation and school places. Plan at risk of leaving a legacy of flooding, fragmented communities and badly planned infrastructure.	The flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would funded by and equalised

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						<p>behaviour and crime</p> <ul style="list-style-type: none"> An increase in traffic congestion and disruption Inadequate public transport <p>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.</p>		<p>across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
42-4	Jo Young	UniFida			4.2 Initial Findings of the Inspector		4.0 Paddock Wood strategic growth - Lack of Infrastructure planning as town centre not included in the Plan - increased risk of piecemeal/incoherent development instead of a thriving centre with community cohesion and key facilities	<p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The Council has revised the Strategic policy STR/SS1 to ensure the requirements of the policy are more specific in terms of elements of the schemes which are required on each development parcel. This also includes the extent of joint Masterplanning needed between developers where development parcels are adjacent. The Council has also been working with developers to ensure the delivery of the Strategic Sites is realistic both in terms of rates and associated infrastructure.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
42-5	Jo Young	UniFida			4.6 Education infrastructure provision		Legally non-compliant/unsound: Plan does not bear relation to PW Neighbourhood plan - so does not fulfil legislative responsibility to consult meaningfully with the community. Plan not written with experience of holistic planning, levelling up communities, building for the long term	The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).
42-6	Jo Young	UniFida			8 Overview and Conclusions	Use an up to date EA map.	8.1c Legally non-compliant/unsound: Flood plan used is out of date - incorrect to say Paddock Wood can accommodate additional houses Plan does not take account of 1,000 recent new homes and run off from houses in other areas that affect Paddock Wood down stream (photos submitted) Solution: use up to date EA flood map	Both the Submission Local Plan 2021 (3.128) and The Strategic Sites (Master planning) Addendum paper (PS 046), take account of the consented growth at Paddock Wood. The further flooding assessment and modelling work which has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood and utilised the most up to date data to provide the latest assessments on flooding impacts. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
42-7	Jo Young	UniFida			4.4 Flood risk and Housing	Use an up to date flood map -	Para 4.17 legally non-compliant/unsound:	The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling

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						Refer to the change in flood zones on the EA website.	<p>Flood management - needs to be based on recent revisions to flood zones/flood risk areas (2018 flood data out of date) and no sequential/exception tests included. Recent developments used Rhoden culverts under railway line but they are currently full (photos of Lucks Lane attached). Further development will inevitably cause more flooding.</p> <p>Solution: Use latest flood information and maps Other: Lack of engagement with Paddock Wood Town Council and residents</p>	<p>(PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The further flood assessments carried out also evaluate the areas to the north of Paddock Wood which are subject to river flooding from the Medway and Tiese rivers. The conclusions show that previously proposed employment allocations to the north of Paddock Wood would fall within Flood Zone 2/3 (based on upperend climate change modelling). This includes Keylands Farm and Swatlands Farm which have now been removed as allocations as part of the revised Strategic Sites strategy due to this flooding impact and in view of the Inspector's comments regarding development outside of flood zone 1. It is acknowledged that Swatlands Farm has benefitted from a grant of planning permission since the initial Local Plan hearings, although this was prior to the further flood assessment work having taken place.</p>
42-8	Jo Young	UniFida			4.1 Strategy and Implementation		<p>Paddock Wood strategic growth - Legally non-compliant/unsound:</p> <p>Plan does not relate to Paddock Wood Neighbourhood Plan, so does not fulfil legislative responsibility to consult with the community or the objectives within it. Written with no holistic planning, levelling up communities, building for the long term with an understanding of infrastructure, flood management and public service</p>	<p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and</p>

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							<p>provision - piecemeal with a lack of understanding of current situation in Paddock Wood.</p> <p>Other: Plan does not take account of 1,000 recent new homes. Situation over last 2 years - increased flooding, lack of suitable health care provision and school places, increased anti-social behaviour/crime, increased traffic congestion, inadequate public transport</p>	<p>should shape and direct development that is outside of these strategic policies (para 13).</p> <p>Both the Submission Local Plan 2021 (3.128) and The Strategic Sites (Master planning) Addendum paper (PS 046), take account of the consented growth at Paddock Wood.</p>
42-9	Jo Young	UniFida			4.7 Sports and Leisure provision		<p>Sport and Leisure Provision Para 4.58 legally non-compliant/unsound: Lack of reference to Paddock Wood Neighbourhood Plan, which includes a range of objectives including new sports facilities</p>	<p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS 046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS 054).</p>
42-10	Jo Young	UniFida			4.8 Overview and Conclusions	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	<p>11.0 Housing need and supply: NPPF 2023 changes stating that fewer houses could be built are relevant. NPPF Para 60/61 refers to building for local housing needs, but known developers and London Boroughs are working to move residents out of London. Price of accommodation is too high for local people. Housing need/provision should be allocated for local people only.</p>	<p>The council Strategic Housing and Economic Land Assessment (SHELAA) reviews the sites in the SLP for appropriateness. Further work has been undertaken on Green Belt sites, and this in the High Weald national landscape in the evidence base.</p> <p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14</p>

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						people who are being priced out of the market. Housing need and provision should be specifically allocated for local people only.		[core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.
42-11	Jo Young	UniFida			5 Transport related matters		Transport - legally non-compliant/unsound: Proposal for restriction of traffic movement over the bridge in Paddock Wood (important route north/south) not well thought out - will increase traffic in residential areas and single track lanes (e.g. Lucks and Wagon) on outskirts of the town.	Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS_047 , PS_048 , and PS_049) has been published as part of the stage of the examination.
43-1	Ann Newman	n/a			4.4 Flood risk and Housing	TWBC must show more strategic planning activity with Southern Water and the EA to provide a detailed strategy for protecting current properties. The plan does not mention this - only planned developments. What's going to protect my house with dual rainwater/wastewater drains and no flood measures in place or planned.	Flood Risk and Housing legally non-compliant/unsound: Paddock Wood is a complete hotch-potch of inefficient flood mitigation measures. Revised flood maps move many areas for proposed development into flood zone 3, but what about existing properties? Solution: TWBC must work with Southern Water and the EA to provide a detailed strategy for protecting current properties. Other: PW landowners have not been approached to discuss how they could help mitigate flooding e.g. wetlands	The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood

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								betterment to the north western area of the existing settlement' for the north-western and western parcels of land.
43-2	Ann Newman	n/a			8 Overview and Conclusions		<p>Overview and Conclusions legally non-compliant/unsound: TWBC should:-</p> <p>Conduct further consultation for Paddock Wood and speak with the Town Council and local people Consider impact on local people - massive upheaval for many years and what will be gained? Re-evaluate new housing targets - many of the new homes already built are unoccupied. No local need. Consider brownfield before green field sites always</p> <p>Other: whole process extremely difficult to navigate and understand and not written in plain English</p>	<p>Discussions with local councillors, Paddock Wood Town Council and Capel Parish Council have continued through the process of revising the Strategic Sites strategy following the Inspector's Initial comments. The Council has engaged with local stakeholders and has sought to reflect any views within the revised SS strategy. The Strategic development sites will incorporate 40% affordable housing which will cover a variety of forms including shared ownership and affordable rent.</p> <p>Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83. The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness.</p>
43-3	Ann Newman	n/a			4.1 Strategy and Implementation	TWBC must tell us what is planned for the town centre and how this will be integrated in a cohesive way with the rapid expansion of the town. Currently these plans are not being made public so it is a real missing link.	<p>Infrastructure legally non-compliant/unsound: Omission of plans for Paddock Wood Town centre - how can the Local Plan move forward if town centre plans for rejuvenation are unknown?</p>	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with the Masterplanning Consultant (DLA) (PS 046).</p>
43-4	Ann Newman	n/a			4 Paddock Wood strategic growth	The Inspector's findings that revisit the growth strategy for PW set out the reduction in housing allocation which is welcomed although the scale is astonishing for a small town with NO associated infrastructure improvements. The developments permitted under the	<p>Reduction in housing numbers welcomed Recently built developments have added no betterment. Flooding problems now worse and affecting homes. More growth will bring more disruption. Plans for town centre should not be dealt with in isolation - vibrancy and welcoming town centre needed for the local community The Local Plan fails to address the principles of the Paddock Wood Neighbourhood Plan</p>	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1</p>

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						<p>previous Local Plan have added nothing to the town in terms of betterment for local residents and the lack of a cohesive strategy for the existing and planned developments is extremely disappointing. Dealing with the Town centre as a supplementary paper is disingenuous and not to include it in the local plan a significant missing piece of the jigsaw – so significant that we consider that the revisions are being made in isolation and encouraging a less than joined up approach. Paddock Wood needs an identity and a vibrant Town Centre to bring together the new community in a pleasant, safe and interesting environment. What we currently have is a small shopping area with a good number of independent shops and businesses which largely meet the needs of the existing population for day to day needs but for the larger shops, cinemas, restaurants, wine bars, gyms, people drive out of town to visit Maidstone, Tonbridge and Tunbridge Wells or take the train to London. There is</p>		<p>following on from work with the Masterplanning Consultant (DLA) (PS 046).</p>

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						<p>little in Paddock Wood to encourage people to spend money in the town, particularly true in the evening though the worrying recent increase in anti-social behaviour will need to be addressed properly. Barring an excellent supermarket, an Indian restaurant and two pubs there is little to bring people into the Town Centre after working hours. This has been exacerbated by the piecemeal developments of Churchill Homes and the latest one in Station Road which have taken prime town centre sites and made them residential resulting in permanently restricting retail and social space in this area. A huge missed opportunity which cannot now be replaced. A further site has now gone up for sale (the ex Jewson's site) and should not be permitted to add to the increasing number of residential properties in the vicinity of the town centre until the promised masterplanning issues come into play and ensure that there is planned town centre development</p>		

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						<p>rather than the current hotch potch. In addition we are very concerned that the TWBC revisions relating to Paddock Wood fails to address the Paddock Wood Neighbourhood Plan which was approved by the community in October 2023 and should be reflected. An enormous amount of work went into this plan which seems to have been ignored which is very disappointing. The principles of the Neighbourhood plan should be reflected throughout any continuing growth strategy and this includes a planned approach to the town centre. Given the proposed expansion of the town set out in the TWBC revisions to the local plan, the current situation is entirely inadequate. People need a welcoming town centre to provide places to socialise, eat out, a range of independent shops and businesses and provide an incentive to walk into town rather than drive to surrounding areas. The omission of the town centre from the local plan is a massive and damaging oversight.</p>		

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43-5	Ann Newman	n/a			4.5 Employment land - review of options	Ensure that access to the employment site at rhoden Farm is via Transfesa to protect the single track, far too busy Luck's Lane as well as the tiny railway crossing.	Para 4.33 The map does not show where the access would be to land at Rhoden Farm 'Northern Parcel' designated as employment - should be within the current Transfesa site NOT via Lucks Lane (as is single track with narrow railway crossing)	Employment land provision at Paddock Wood (PS 045) sets out the employment provision for revised policy ST/SS 1. The proposed employment site at Land East of Transfesa would be accessed via the existing employment area linking to Maidstone Road.
43-7	Ann Newman	n/a			1 Introduction	I believe that TWBC should run a further consultation that actually consults local people, either through extending the current closing date of holding a further 6 week consultation period during which TWBC officers actually visit the town and run some public engagement events. Sadly missing from the current exercise.	Introduction - Legally non-compliant/unsound: Short term nature of the plan (10 years) is non compliant. Proposals have a massive impact on Paddock Wood (PW), but lack of proper consultation with PW Town Council and local residents - further longer consultation with in-person events needed	The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'. The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS 054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period. Discussions with local councillors, Paddock Wood Town Council and Capel Parish Council have continued through the process of revising the Strategic Sites strategy following the Inspector's Initial comments. The Council has engaged with local stakeholders and has sought to reflect any views within the revised SS strategy.
44-1	M Downey				4 Paddock Wood strategic growth	To locate new proposed housing elsewhere which, will not affect the current/ existing flood mitigation strategy.	Plan Legally non-compliant/unsound - Land east of Capel: Even with flood risk mitigation and betterment, more building could have disastrous consequences as measures are based on old data and climate change not fully considered. Green Belt should not be sacrificed. Failure to provide infrastructure to those already living in the area. AONB (National Landscape) is home to many wildlife species - will disappear. Solution: Locate new housing elsewhere not affected by flood mitigation strategy.	The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood

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								<p>modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>
46-1	David Maher	Dandara South East Ltd			Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		<p>Appendix D: Proposed changes to policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel - legally compliant/sound Policy SS/STR1(B) - South Western parcel requirements.</p> <p>Dandara seeks the following modifications to the policy criteria: Criterion ii) - seeks to secure sheltered accommodation. No objection but would ask this be captured within the 40% affordable provision (criterion i which amounts to 200 dwellings) to enable viability. Criterion iii) - seeks 4.54 ha of land for sport/leisure provision. David Lock Associates Land Use Budget Plan shows sports/leisure provision extends across SW Paddock Wood (SS/STR1(B)) and NW Paddock Wood (SS/STR1(A)). The policy implies entire sports provision is provided solely in SW Paddock Wood. Requested policy is amended to address this. Criterion xii) - seeks drainage measures (including SUDS) and connection to wastewater treatment facilities. These requirements are supported, however, it is requested that a "so far, as possible and practicable at the planning application stage; caveat be added, as work towards 'betterment' will be undertaken at the detailed/planning application stage when issues - levels, groundworks etc. are better known.</p>	<p>These comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>

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							Discrepancy - Revised Map 28 (Paddock Wood and East Capel Structure Plan) - 3 locations for pedestrian access along eastern boundary were initially considered but only the northern and southern connection options were found and agreed (with TWBC) to be deliverable. Request that map be amended.	
47-1	Emma Cunningham on behalf of Sport England	Sport England	Emma Cunningham	Planner	4.7 Sports and Leisure provision	Sport England would like to see the council produce an updated PPS and BFS in collaboration with the National Governing Bodies for sport in order to better understand the sport and recreation provision in the council. We have had conversations with Football and Cricket recently who have raised significant concerns over the access to facilities.	<p>Sport England consider the changes to the amended plan at paragraphs 4.59 and 4.60 would not make it legally compliant and sound due to;</p> <p>The NPPF requires that the preparation and review of all policies should be underpinned by relevant and up to date evidence. SE have encouraged TWBC to prepare an updated PPS and BFS which were adopted in 2017 and are now out of date.</p> <p>Assessments carried out in 2018 and 2019 have not been shared with SE and they would encourage a PPS and BFS to be carried out in collaboration with the NGB's so that full review of existing facilities can be done.</p> <p>The proposed changes to remove the sports hub at PW and provide enhancements to existing facilities at Green Lane should have included a feasibility study, however it is not clear if this has been carried out to ensure that the necessary upgrades to facilities could take place.</p> <p>Recent discussions between SE and football and cricket recently have raised significant concerns over the access to facilities.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities.</p> <p>This strategy has evolved and it is likely that enhancement designs for the sport provision would be refined through the detailed planning app stage.</p>
47-2	Emma Cunningham on behalf of Sport England	Sport England	Emma Cunningham	Planner	Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	This major development at Paddock Wood will have significant impact on the existing demand for sport and physical activity provision. Sport England would strongly suggest that an FPM run for swimming pools and halls in the borough is carried out. This will provide a comprehensive overview of the existing provision and the impact of major developments on this provision. Given that there will be an	<p>Sport England consider the amended plan to be legally compliant and sound in but have the following comments;</p> <p>Major development at Paddock Wood will have significant impact on demand for sport and physical activity provision.</p> <p>SE recommends that an FPM run for swimming pools and halls in the borough is carried out to provide an overview of existing provision and impact of development.</p> <p>SE would recommend amending Policy STR1/SS to refer to the provision of an upgrade to existing indoor and outdoor sports facilities which may include a 25m swimming pool.</p>	<p>Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p>

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						increase in population, Sport England would suggest that the below wording as part of STR1/SS is amended to require that a swimming pool is delivered in the local area through the development. f. Sport and Leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)		
49-1	Teresa Homewood				4.4 Flood risk and Housing	<p>Firstly, the most concerning is the lack of consideration and planning given to the flood area where the new extensive development is to be proposed</p> <p>The development is not required. The new estates are not selling the quota predicted, Paddock Wood lost its Police Station to new houses, non of which have been sold.</p> <p>The proposal has not in any way been positively prepared for the area, So many considerations that are vital have been ignored. This is another rushed planning proposition by TWBC which has deliberately blind sided Paddock Wood because of the successful campaign of Save Capel.</p>	<p>Paddock Wood - not legally compliant and unsound</p> <p>The proposed amendments fail to address the Paddock Wood Neighbourhood Plan which was approved by the residents through the referendum. The principles of the Neighbourhood Plan should be reflected throughout any continuing growth.</p> <p>The new plan extends into areas that were not previously allocated for development. This appears to be very underhand and concerning by TWBC. Residents are aware of the success of Save Capel which has forced TWBC to decide on placing 2600 houses within the same area, just outside the original proposal.</p> <p>The existing three large developments are still unsold, with the developers advertising abroad and the affordable housing being sold to Croydon Council, despite assurances from TWBC that this would not happen. The affordable retirement flats at the north of Commercial Road have also been sold by TWBC.</p> <p>The development at Badsell Road should have included a pumping station. The lack of one has cause multiple burst water mains in the area, causing road closures and sink holes.</p> <p>The strategy for Paddock Wood is flawed and not compliant with the NPPF regarding flood risk, which demonstrates the failure to provide a safe and sensible development strategy. The main areas of development are on flood zones 2 and 3 which will negatively impact existing residents. The scheme at Swatlands Farm does not consider concerns of local residents regarding</p>	<p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p> <p>Both the Submission Local Plan 2021 (3.128) and The Strategic Sites (Master planning) Addendum paper (PS_046), take account of the consented growth at Paddock Wood.</p> <p>The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all</p>

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						<p>why is it only Paddock Wood and Capel considered for this development?</p>	<p>consistent flooding in the area. Within 24 hours of the foundations being dug the foundations were completely flooded. Development on a flood plain was chosen instead of utilising empty units on the North Farm Estate. The respondent also has concerns with how the contract was awarded to Gallaghers to develop the site. The development of the site will lead to a detrimental impact to the environment, with increase in traffic, pollution and flooding.</p> <p>There is no consideration of the existing flooding from streams in Capel Parish. For example, there is significant flooding along Gravelly Stream, which accepts diverted water from the Tudeley Brook Stream.</p> <p>The proposed new development by Redrow and Persimmon includes plans for a new sewage works which will deposit a minimum of 50 000 litres a day into the Rhoden Stream. This will cause issues with the culvert under the railway line which has insufficient capacity. If improved, it will push the problems downstream. There is no mention of realistic solutions to deal with this.</p> <p>The Council seem so consider wastewater, freshwater and surface water as one issue, showing a lack of understanding of the issues in Paddock Wood. These are already causing issues due to the high water table on new housing sites. Further flooding and building on flood plains will cause issues with houses being insured. There is no mention of the existing properties in flood zone 3. The proposals do not consider the 37% increase in rainfall from climate change, nor has any mention been made of the rainwater run off from Brenchley and Matfield.</p> <p>There are existing issues with sewage in Paddock Wood and Queen Street, which has issues of sewage coming into homes. Sewage water frequently sprays from the plant at Lucks Lane.</p> <p>It is concerning that the town centre has not been included in the Paddock Wood Structure Plan. It is disingenuous to deal with it through a supplementary paper. It seems the revisions are made in isolation when a joined up approach is needed. People need a welcoming town centre and a reason to walk into town rather than drive to surrounding areas. The focus solely on developments around the town without the required investment means present facilities are expected to cope with the additional homes. In addition to the lack of amenities, this creates dormitory settlements with traffic issues.</p> <p>To enable existing small developments in the town centre, a number of businesses and the police station have had to</p>	<p>residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p> <p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The Council has revised the Strategic policy STR/SS1 to ensure the requirements of the policy are more specific in terms of elements of the schemes which are required on each development parcel. This also includes the extent of joint Masterplanning needed between developers where development parcels are adjacent. The Council has also been working with developers to ensure the delivery of the Strategic Sites is realistic both in terms of rates and associated infrastructure. The Inspector also comments at para 52 in his Initial Findings letter (November 2022)... "that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells.</p>

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							<p>close to enable the redevelopment. These remain largely empty. The increase in housing must be considered in terms of need.</p> <p>The scale of development for a small town with no associated infrastructure improvements is astonishing. The developments permitted under the previous Local Plan have added nothing in terms of betterment for local residents. For this Local Plan, there are limited plans for improvements to infrastructure, such as roads, rail, buses, GPs, dentists, shops, crime and antisocial behaviour prevention.</p>	<p><i>I therefore agree with the Council that it represents a 'logical choice' for growth".</i></p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
51-1	Rodney Atkins				4.7 Sports and Leisure provision	<p>Paddock Wood NDP needs to be taken into account.</p> <p>Upgrade of Putlands isn't concreting over the rugby field.</p> <p>Establish a full relationship with Paddock Wood town council and work them for the betterment of Paddock Wood.</p>	<p>Proposed Changes to the Local Plan for Sports and Leisure provisions at Paddock Wood: Legally Compliant but Unsound</p> <p>Concerns about revised sports strategy – sports hub to be placed at Putlands instead of having a new sports hub located south of the railway line/east of the A228 (Eastlands), as proposed in the Paddock Wood Neighbourhood Plan (PWNDP).</p> <p>Disadvantages of locating the hub at Putlands identified in the <i>TWBC - Strategic Outcomes Planning Guidance (SOPG) Diagnostic Report (2021)</i>, still stand (even with the removal of Tudeley Village and reduction in houses at Paddock Wood):</p> <ul style="list-style-type: none"> • <i>Unfit capacity for 25m swimming pool, larger fitness suite and additional studios – still no capacity</i> • <i>Onsite refurbishment unlikely to deliver full potential for physical activity – therefore cannot meet growing needs of town</i> • <i>Unsustainable location to attract new communities – it is clearly in the wrong location</i> • <i>Existing infrastructure that is limited car parking, covenants on land restrict extent and nature of refurbishment – TWBC's answer is to build a car park on the current rugby field (only field and no consultation with rugby club), will destroy valuable green space and does not support Active Travel. How can the loss a rugby pitch be an "upgrade to facilities"?</i> • <i>Additional pitch capacity would still be required on another site for football and rugby – has been met through another allocation adjacent to railway line</i> <p>The new proposals are contrary to made PWNDP policies (which need to be taken into account):</p> <ul style="list-style-type: none"> • Policy SR1 - Putlands (requires proposals for extension/replacement buildings to minimise loss of mature trees and potential impact on existing outdoor sports facilities) – Rugby pitch will be 	<p>These comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p> <p>The Council considers appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p> <p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the</p>

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							<p>replaced with car parking at Putlands and a mature oak tree will be lost at Green Lane (waterlogging issues here also not considered)</p> <ul style="list-style-type: none"> Policy SR2 - Outdoor Sports Hub (hub for outdoor sports for all ages, including team sports/other activities with changing facilities, café/bar etc. and incorporation of secure cycle parking and internal cycle routes) - no room at Putlands for café/bar/on-site changing facilities to support increase in volume of sports users and not possible to have cycle routes between Putlands and main access <p>Other:</p> <ul style="list-style-type: none"> Revised strategy fails to identify Elm Tree sports pitches (largest club in PW) and limitation for on-site parking and changing facilities Strong lean towards improving walking/cycling conditions, but current plans are below active travel schemes implemented in other boroughs 10 year plan – why can't the sports hub be planned in 2 phases? Allocate land now ready for s106 monies coming forward in next Local Plan - would provide better facilities in long term Should be closer working between TWBC and PW Town Council for the betterment of Paddock Wood 	<p>proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p> <p>The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council agrees that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.</p>
52-1	Raymond Moon				1 Introduction		<p>Paddock Wood, Tudeley, and plan period - not legally compliant/unsound Removing Tudeley from the plan was clearly a political decision, and the easy option regarding the issues raised by the Inspector. These issues could have been addressed. The inclusion of a garden village has clear objective and advantages:</p> <ul style="list-style-type: none"> It enables a 15 year plan It addresses the decline in home ownership for those aged 25-34 New home delivery is failing and availability is less affordable in rural areas. A new settlement would have delivered new infrastructure. <p>A long-term solution to housing needed. No location is perfect but Tudeley was well researched and planned. It remains the best option for the whole borough. The infrastructure in Paddock Wood has not kept pace with the towns historical growth (1960s-present day) and has little capacity to cope with the proposed future growth. TWBC's response relies on a SPD for Paddock Wood. The assumption is the masterplan is working from the Inspector's original conclusion, but to date, it has failed to deliver.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p> <p>It is correct that the developer for the current planning app for Land East of PW (Redrow) has chosen to incorporate a new privately managed WWTW within their development to service the proposed dwellings. However, this is not a position which TWBC supports (and which it is highlighted the policy STR/SS1</p>

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							<p>Current planning applications for new includes provision for a private foul water sewage network which is far from a masterplanned approach.</p> <p>TWBC's response (para 4.16) has not addressed the matters listed in the Paddock Wood masterplanning and planning for the future. The assumption that garden settlement principles not proven. If the same principles were applied to Tudeley it would still be viable. Why is it okay for Paddock Wood?</p> <p>TWBC have failed to apply a sequential and exceptions test on the proposed new development in Paddock Wood, which highlights a fundamental flaw in the claim that the flood risk has been removed via the masterplanning. The flood assessments are flawed and do not account for how development on flood zone 1 relates to zones 2 and 3, and the need to mitigate surface water flooding directly on the new development sites.</p> <p>The proposed development near the old Elm Tree pub presents issues for the Rhoden Stream, which has already had to deal with new houses on Green Lane and Church Farm. It is reaching a saturation point and the masterplan has not delivered any infrastructure improvements along these watercourses around Paddock Wood.</p> <p>The lack of a clear masterplanning approach has resulted in the Swatlands Employment Sites being approved before the Local Plan is adopted. The new flood risk evidence indicates the scheme might not have been approved had the evidence and NPPF requirements been followed.</p> <p>It is welcome that new houses will only be built on flood zone 1. However, there is no reference to the potential for climate change to change flood zone 1 areas to 2 or 3. This is a short term solution to justify the removal of Tudeley at the expense of Paddock Wood dealing with increased flood risk in the current flood zone 1.</p> <p>The suggested sports enhancement programme totally ignores the Paddock Wood Neighbourhood Plan, where future sports provision was to be provided by the inclusion of a sports hub. There is a clear need for a sports hub with the predicted population growth of Paddock Wood. The Neighbourhood Plan clearly argues the logical solution to future sports provision is a new sports hub. The Town Council were not adequately consulted on the decision to remove the sports hub from the plan and the removal of the hub will damage the confidence in neighbourhood plans.</p> <p>The mention of draft bus feasibility study in para 5.15 is inadequate and lacks a coherent strategy and deliverable solution. A similar scheme was proposed regarding the Green Lane development and the service collapsed after 2 month. A new bus route is within the remit of KCC</p>	<p>refers to strategic infrastructure including waste water rather than the developments being individually serviced. Discussions have been ongoing with both the developer and Southern Water, since the submission of this application.</p> <p>Southern Water have been engaged directly throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p> <p>The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. It is expected that detailed surface water drainage proposals would form part of the detailed design stage for each development parcel. This will include the use of SUDS and is not usually expected</p>

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							<p>Highways and bus operators. There is no sound evidence that discussions have taken place on the proposal within the TWBC response nor the masterplan.</p> <p>Network Rail has not been engaged in any meaningful discussions with TWBC or PWTC on the suggested Railway Bridge enhancements nor on the new walking and cycling crossing points.</p> <p>The planning for Paddock Wood town centres does not appear to have considered the requirement to service the increasing population. By allocating an unfair proportion of housing to Paddock Wood, TWBC has misinterpreted the recent NPPF amendments regarding the ability for local authorities to be flexible in determining their housing need. The existing services and utilities (e.g. schools, GPs, flooding and foal water/sewage provision) are currently not able to cope and will become less likely to be able to cope.</p> <p>The remaining 2600 houses allocated at Paddock Wood is even less sustainable with only a 10 year plan. An immediate Call for Sites will be required to meet the present housing need across the borough. Unfortunately, this will open the door to land owners around Paddock Wood, and not those around the town of Tunbridge Wells. The identity of Paddock Wood will change from a small parish village to a middle size rural town. Sustainable infrastructure improvements have not been progressed in Paddock Wood. The opportunity to create purpose built infrastructure within a new garden village has been missed. A 10 year plan fails the residents of the borough. Future growth across the borough has been compromised with Paddock Wood being the "local area of growth". Any resident of Paddock Wood would disagree with that statement.</p>	<p>as part of overarching allocations. It is also highlighted that such details form part of the revised policy wording for STR/SS1.</p> <p>A Statement of Common Ground was previously agreed with Network Rail as part of the Submission Local Plan where such infrastructure links were incorporated. TWBC has liaised with Network Rail again through the further revised strategy work which has been undertaken, and an update to the SOCG to inform the future Local Plan Hearings is ongoing.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>The Council has carefully considered public transport options as an integral part of the transport enhancement delivered through the Strategic development. Sustainable transport modes are a fundamental part of achieving a model shift for some trips away from the private car. As such, the Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents List), which formed part of the evidence for the Submission Local Plan 2021 (3.128). This sets out the key routes and connections through Paddock Wood and the enhancements needed to improve their usability.</p>
53-1	Dave Lawes				1 Introduction		<p>Paddock Wood strategic growth - legally non-compliant/unsound: Inspector states - 'implications of my initial findings at Tudeley Village could have far greater consequential impacts on other aspects of the plan, from infrastructure</p>	<p>It is correct that there have been important consequential changes to the Strategic Sites proposals through the removal of the proposed allocation for Tudeley Garden Village. However, the Council has sought the retain the vision for the growth and PW and E</p>

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							<p>provision to whether the Plan is able to identify a sufficient supply of housing land'</p> <p>Little/nothing in proposals address the overall shortfall of housing resulting from removal of Tudeley Village and reduction of development in Paddock Wood, other than reference to an early Plan review. Why has TWBC not identified alternative sites now as part of the proposals? Plan appears incomplete with key decisions being pushed back to the early review.</p> <p>With no revision/update of key documentation such IDP and Paddock Wood Structure Plan, and without considering other potential sites now, PW town centre will remain severely undeveloped and new development fractured/uncoordinated, lacking a cohesive plan and funding for timely utilities and vital infrastructure.</p> <p>More engagement needed with PWTC and consideration of Neighbourhood Plan</p> <p>Unrealistic timescales for building and housing targets will not be met.</p> <p>Lack of detail re infrastructure - health, schools, sports facilities. Already issues since recent new builds, as well as deteriorating roads, anti-social behaviour and lack of investment in town centre. Revisions to Plan do not inspire confidence these issues will be addressed.</p> <p>Little consideration of flood risk to existing housing - excessive surface water flooding already a problem for many properties. More investment in drainage infrastructure needed. Will this be addressed?</p>	<p>Capel and the proposals retain appropriate levels of Infrastructure provision within the policy wording of STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046). This includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p>
54-2	Christine Spicer				4.7 Sports and Leisure provision		<p>Sports and Leisure provision for Paddock Wood strategic growth: Unsound</p> <p>In appropriate venue for outdoor sports provisions despite being raised in the first round of Local Plan. Lack of communication with the Town Council - who runs, manages the facilities, and partners with local sports clubs and organisations to produce the Neighbourhood Plan.</p> <p>Uplift proposal not adhere to the actual/future use of existing sports facilities and disregard the constraints like flooding at Putlands or existing pressure on the Elm tree pitches, hence not robust.</p>	<p>STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p> <p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p>

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54-4	Christine Spicer				6 Infrastructure		<p>6.0 Infrastructure: Unsound</p> <p>Infrastructure Delivery Plan - inclusive of doctor health/educational/sports: Need robust evidence with detailed timeline, funding mechanism. Plan for new offsite health centre to be scrutinised as some neighbouring surgeries have closed now while existing centres are at full capacity.</p> <p>Proposed infrastructure wide ranging from transports, utilities, 3FE secondary and 2FE primary, to community amenities/sports, etc. is vague and needs stronger commitment.</p> <p>Wastewater works and upgrade: inadequate in funding terms and also in plan for expansion (disregarded in the masterplan).</p>	<p>The proposals retain appropriate levels of Infrastructure provision within the policy wording of STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS 046). This includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.</p>
54-5	Christine Spicer				9 Development strategy options		<p>Welcome proposed areas of development in Paddock Wood contingent to better flood modelling but not comply to good place-making principles:</p> <p>Fractured form of development: negate sustainable transport modes, social inclusion and community cohesion which is central to NPPF</p> <p>Location-wise: unable to create a strong edge to Green Belt as visioned</p> <p>Indicators establishing basis for quality of life and better living spaces in the Paddock Wood NDP should have been considered.</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS 046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The Inspector also comments at para 52 in his Initial Findings letter (November 2022)...<i>that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth</i>".</p> <p>The Green Belt would be appropriately respected through suitable development densities (particular to the western development parcels) to create an appropriate edge to the development which is responsive in design terms. The proposed Green Belt boundary would also be defined by Maidstone Road (A228) which would create a legible and suitable edge to the GB.</p>

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54-7	Christine Spicer				14 Commitment to early review		PWTC should be involved in any commitment to early review.	Undertaking further Call for Sites, and their review will be undertaken as part of the Council's commitment to an early review of the plan which will incorporate consultation with local groups and the wider public.
54-8	Christine Spicer				4.4 Flood risk and Housing		<p>Rhoden Stream is already threatened by:</p> <p>surface water from development on Green Lane and Church Road, the dams by the railways and the small culverts</p> <p>Hence can't afford extra-pressure from new development proposed at Queen Street by Redrow and Persimmon.</p> <p>Object to the council's approach in blurring wastewater, freshwater and surface water together and only reference to river flooding, while placing strategic sites in flood risk areas.</p> <p>Concerned that sewage upgrades under construction will not work, questioning why SuDS not required on Mascalls Grange, hence doubt that surface water will be tackled.</p> <p>Swatlands employment site approved before the Local Plan is examined and adopted is flawed in principle.</p>	<p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land. Detailed surface water drainage proposals would form part of the detailed design stage for each development parcel. This will include the use of SUDS and is not usually expected as part of overarching allocations. It is also highlighted that such details form part of the revised policy wording for STR/SS1. Detailed surface water strategies (approved by EA and KCC as local flood authority) also formed part of the planning applications for the three consented and largely completed housing schemes within Paddock Wood.</p> <p>It is acknowledged that Swatlands Farm has benefitted from a grant of planning permission since the initial Local Plan hearings, although this was prior to the Inspector's Initial Comments and the further flood assessment work having taken place. The Council is duty bound to consider planning applications when formally submitted and in view of the material considerations at that time (being the context of a draft allocation with the Submission Local Plan).</p>
54-9	Christine Spicer				4.2 Initial Findings of the Inspector		TWBC barely referred to the Paddock Wood NDP 'made' in October 2023 that reflects the community voice with updated policies for the Town's future and hence should be regarded as part of the Local Plan.	The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and

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								should shape and direct development that is outside of these strategic policies (para 13).
54-11	Christine Spicer				4.3 Review of the allocation in light of the Inspector's initial findings		Seconded that building to be sequential and not on areas of high flood risks.	The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
54-12	Christine Spicer				4.6 Education infrastructure provision		Concern about a plan for a new Primary School due to the existing school's overcapacity.	The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement and being supported by the necessary infrastructure. The Council has discussed the education need generated by the proposed growth and it has been concluded that two new 2FE primary schools are needed. The Masterplanning document shows that a new school would be placed on each side of PW settlement.
54-13	Christine Spicer				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		Local knowledge, especially from PWTC needs to be included in the delivery of the good improvement as in Map/Figure 27 - Appendix D.	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council agrees that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.
54-14	Christine Spicer				8 Overview and Conclusions		Demanded PWTC to be included in any future hearings given the scale of development and well-known constraints.	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council agrees that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design
57-1	Andy Ratcliff				4.4 Flood risk and Housing	3 separate housing developments are currently under way with over 1000 new homes being built.. Despite repeated assurance that appropriate infrastructure would be in place before the developments commenced,	Concerns that little consultation with PWTC taken place, and infrastructure trailing behind the new development that is insufficient in the aspects of: Number of doctors (e.g. Woodlands Health Centre) Functional traffic facilities (e.g. traffic light at Maidstone Road and Badsell Road) Public transport. Abandoned water ring by Southern Water that question the measures planned.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046). This includes education, highways and connectivity, health, sports and leisure (to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool) which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites.

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>Paddock Wood has seen no additional provision for additional doctors at Woodlands Health Centre, no new primary school, no realignment of the traffic lights at the Maidstone Road and Badsell Road, the water ring main round the town has been abandoned by Southern Water and yet the plan now is to build a further approx 2500 properties - what flood prevention steps are being taken - none at present. In addition public transport is poor. Instead Paddock Wood has a white elephant athletics track which the majority of residents did not want and which is severely underused what a waste of money. Where is the swimming pool which would be of much more benefit to the town.</p>	<p>Besides, inefficient use of budget on existing sports facilities, e.g. the athletic tracks, which should have been better spent for a swimming pool.</p> <p>Hence object to the concentration of allocation to Paddock Wood, and suspect proper objection from Paddock Wood Councillors in TWBC to address this.</p>	<p>Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
60-1	JULIAN TERRY				4.4 Flood risk and Housing	<p>Less properties being built and if they are significant upgrades to the water treatment system or certain parts of Paddock Wood will be floating in effluent.</p>	<p>Existing treatment works cannot cope resulting in flooding/sewage overflow into homes. New development will make this much worse. Build less properties and upgrade treatment works.</p>	<p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
62-1		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	15 Proposed strategic policy revisions		<p>Support the overall principles of the policy STR/SS 1 especially allocated land at PW with reservations in certain aspects needing clarity for deliverability and viability.</p> <p>Redrow and Persimmons Homes have 3 outstanding applications corresponding to the north eastern and south eastern parcels identified in the consultation documents of masterplanning and proposed modifications specified in SS/STR 1 (C and D), though some discrepancies between the mapping and the actual proposed allocation should be corrected.</p> <p>SLP Mod 9 – revised STR/SS 1 Strategy for PWeC, of the <i>PS_063 Summary of Proposed Modifications</i>: Unsound with following comments made:</p> <ul style="list-style-type: none"> Concerns over the policy’s conciseness underpinned by government guidance, with redundant duplicates, e.g. criterion 3 of Development Principles for Housing Mix associated with Policy H1 or the landscape-led approach repeated in each individual parcel The unnecessary need for the Council’s Structure Plan SPD (Criteria 13 and 15) as stipulated by the LURA 2023 bringing uncertainty to developers and delivery Unrealistic planning condition in mineral extraction terms, likely to fail the test set out in Policy DM 9 of the KMWLP considering existing hedgerows/woodlands. Also redundant given the lack of demand for sandstone in close location to the Persimmon application site and massive geological units generally, which KCC considers criterion (2) of Policy DM 7 would apply. Frequent and future updates of Strategic Sites Masterplanning and Infrastructure Study (supporting document PS_046 at present) should be consulted with proper impact assessment and no unilaterally change in requirements allowed <p>Hence proposed respective amendments to the wording as follows:</p> <ul style="list-style-type: none"> Emphasise at the overarching Development Principles in lieu of repeating at individual parcel level, for a sounder, less confusing policy aiming at promoting many areas as far as it relates to the land north east and south east of PW (SS/STR 1 (C and D)) prior to the Local Plan Examination resuming / via a Statement of Common Ground to be presented to the EIP Replace the SPD with an Appendix to the Local Plan in line with LURA 2023 and development benefits Mineral extraction condition applied only when practical and environmentally feasible <p>Also clarification required on the following criterions:</p>	<p>These comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> • Criterion f of the Strategic Infrastructure (SI) and the criterion iii of SS/STR 1B (south western parcel) where delivery mechanism of the new sports and leisure provision tying with the housing land supply should not prejudice the latter • Criterion h of the SI contrasting with criterion vii of SS/STR 1 (A) (north western parcel) in terms of the number of Forms of Entry • Criterion j or the SI requiring '<i>Contributions towards the improvement of the highway network including the Colts Hill Bypass and Kippings Cross</i>' where none been mentioned in the Study (PS_046) and Viability Assessment (PS_061) nor the IDP, or tally with SWECO Local Plan Transport Evidence Base <p>SS/STR1 (C) South Eastern Parcel commensurate with Persimmons land subject to application 23/00086/HYBRID</p> <ul style="list-style-type: none"> • Criterion ii requires 'specialist extra care accommodation for the elderly' to be amended to reflect the flexible approach adopted in the application, or be deleted in light of what is stipulated in Criterion 3 and 4 of Development Principles section of policy STR/SS 1 • Duplicated criteria vi and x relating to low/zero carbon which should not be expected in light of the ministerial guidance • Criterion ix for 700spm commercial floorspace to be subjected to facility being a viable proposition only • Superfluous criterion xi regarding phasing and contributions that should have been set out in STR/SS 1 <p>SS/STR1 (D) North Eastern Parcel commensurate with Redrow's land subject to application 23/00118/HYBRID</p> <ul style="list-style-type: none"> • Criterion v similar to criterion vi in SS/STR 1(C) hence to be amended and aligned with ministerial guidance • Criterion vi repeats criterion xi of SS/STR1 (C) also believed to be superfluous • Criterion xii repeats criterion xiv of SS/STR1 (C) already reflected in criterion 15 of the Development Principles hence superfluous <p>Conclusion</p> <ul style="list-style-type: none"> • The majority of proposed changes to the Local Plan in the consultation can simply be reworded along with a review of the evidence base so as to justify the position advocated • Uneasy at the sheer length of Policy STR/SS 1 • Likewise for the contradictions raised in the evidence base and the lack of clarity for shared cost management, hence demand a review • Support the Council's proposed response to the Inspectors Initial Findings in general terms and the 	

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>proposed allocation of the land at Paddock Wood for strategic scale expansion, yet</p> <ul style="list-style-type: none"> o Reserved about some of the revised wording of policy STR/SS 1 and their justification o Concerned about some of the assumptions in the updated VA [TWBC: Viability Assessment], consistency in the infrastructure requirements at PWeC in the updated VA and Strategic Sites Masterplanning and Infrastructure Study and the lack of any updated IDP <ul style="list-style-type: none"> • Highlight the desire of Redrow Homes and Persimmon South East to work with TWBC on the delivery of the proposed strategic allocation and the applications for the land east of Paddock Wood have been positively reviewed to respond to Proposed Modifications to the Local Plan and evidence base documents. Also reemphasise the role of the emerging Structure Plan setting the scene for the expansion of PWeC. 	
62-3		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	4.1 Strategy and Implementation		[TWBC: please refer to the Consultation Point regarding Infrastructure (62-8) where the relevant details have been elaborated]	Please see the response to submission 62-8.
62-4		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	4.6 Education infrastructure provision		<p>The proposed changes to the Local Plan are considered to be unsound in regard to Paddock Wood Strategic Growth - Education provision and have the following comments to make;</p> <ul style="list-style-type: none"> • Raise queries in relation to the pupil product ratio from the new developments differing from that set out by KCC as 3 FE. This is as a result of not all new developments producing new pupils and also taking into account selective and non-selective education provision in Kent. • Further work has been carried out as well as discussion with Leigh Academy Trust to determine the feasibility of Mascalls expanding by 3 FE. It is considered that this is achievable on the existing school site and additional land is also available of required. • However the assumption in PS-046 appears to be that the secondary school will need to be provided through the safeguarding of land to the west of PW and it is considered that this needs to be carefully considered and how this would be funded. This needs to be clearly set out. 	<p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.</p> <p>Site specific allocations and supplementary planning document will provide additional policy detail regarding the delivery for the secondary school, its access to sustainable transport in addition to the revised policy wording in STR/SS 1.</p> <p>An option for a new build school has been safeguarded as part of STR/SS 1 in the northwest so that their playing fields form an extension of the green infrastructure network. Secondary school playing fields have been</p>

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								placed in Flood Zone 2 areas, but not as a split site. Developer contributions towards to construction of a 3FE school will be necessary, however if a new build school is required owing to the feasibility of expanding Mascalls Academy not being acceptable then a 4FE school will be required.
62-5		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	4.7 Sports and Leisure provision		The proposed changes to the Local Plan are considered to be unsound in regard to Paddock Wood Strategic Growth - Sports and Leisure provision and have the following comments to make; <ul style="list-style-type: none"> Note that the combined sports hub is now being replaced by improvements to existing provision at Putlands and new outdoor sports facilities at Green Lane as well as more limited facilities on the land to the south west of Paddock Wood. Hope that Sport England and PW Town Council are agreeable with this approach, but note that no updated IDP has been produced as part of the evidence base documents. It is considered that an updated IDP should be produced and any discrepancies of infrastructure costs between various documents should be resolved and infrastructure requirements confirmed. 	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool) as set out in the DSTPA (PS_054). Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.
62-6		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	5 Transport related matters		Transport – in relation to the Strategic Sites Masterplanning and Infrastructure Study Oct 2023 (PS_046) [<i>TWBC: referred to as the Study hereafter</i>] and associated addendum Viability Assessment (PS_061): Unsound with following comments made: <ul style="list-style-type: none"> No clarity on how highway infrastructure proposed responding to plans for expansion of education, sports provision Proposed removed highways still deemed to be essential to eastern land of PW Viability Assessment not factor in the new bus link introduced by Off-Site Highway Improvements and other Road Widening Works/Passing Bays Uncertainty about the off-site achievability of future commercial bus services hence suggest flexible demand-responsive 'yellow bus' type service instead Safeguarding policy required for the land identified and allocated for proposed bus links enabling delivery To clarify and confirm justified costs for Colts Hill Improvements 	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047 , PS_048 , and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for

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							<p>Comments also made in relation to the Local Plan Transport Assessment:</p> <ul style="list-style-type: none"> The Sweco Report on Strategic Modelling and Modal Shift reports remains applicable subject to further liaison with the Highway Authority Fully support the upgrade of Hop Pickers heritage route (identified in the TWBC 'Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling' report (PS_053)) Fully support the walking and cycling provisions identified in the same report above and the LCWIP Phase 2 Fully support the Local Plan and its Evidence Base aims to reduce highway network congestion through delivery of active travel infrastructure 	<p>major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.</p> <p>In terms of viability, the Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS_061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix II Table 2 compared with the previous equivalent results table' and that there is not change to viability overall. £7.25M has been factored into the Colts Hill bypass and includes funds already secured through KCC Highways for development that has been progressed at Paddock Wood.</p>
62-7		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	4 Paddock Wood strategic growth		<p>Comments made in relation to the Interrelationship with other policies of the Submission Local Plan:</p> <ul style="list-style-type: none"> Affiliated policies anticipated to be amended as a result of modifications to the development strategy and infrastructure set out in the Strategic Site Masterplanning Study, e.g. STR/PW 1, would need to be included the Summary of Proposed Modifications (PS_063) Likewise Policy STR 5 based upon IDP should have been updated to ensure justified infrastructure in place meeting development need 	<p>These comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>
62-8		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	6 Infrastructure		<p>Infrastructure – in relation to the Strategic Sites Masterplanning and Infrastructure Study Oct 2023 (PS_046) [TWBC: referred to as the Study hereafter] and associated addendum Viability Assessment (PS_061):</p> <p>Unsound with following comments made:</p> <ul style="list-style-type: none"> As indicted above (TWBC: see Consultation Point on Proposed Strategic policy revisions – SLP Mod 9), amending wording required for STR/SS 1 having the Council's Structure Plan is to be included as an Appendix to the Local Plan, and not as a SPD Outdated data regarding the current applications to the east of PW in the Study accompanied by changes in Masterplan, requiring guidance to be specified in the Structure Plan how sites should be brought forward 	<p>These comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>

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							<ul style="list-style-type: none"> Note that sites to the west are not fully inspected by DLA in the Study hence should not form a fixed blueprint for the Structure Plan Eastern sites should still be protected from unjustified changes though not being the Inspector's main concern for the Structure Plan No comment on flooding as not applicable to eastern lands but more clarity required for viability and safeguarding land for education provision of extra Form of Entries [TWBC: also see submission 62-4 under consultation point Education Provision] To address the discrepancies for Sports and Leisure provision with a properly updated Infrastructure Delivery Plan (IDP) [TWBC: also see submission 62-5 under consultation point Sports and Leisure Provision] No clarity on how highway infrastructure proposed responding to plans for expansion of education, sports provision, and concerns over the cancelling of highways projects or insufficient assessment to bus infrastructure and viability [TWBC: also see submission 62-6 under consultation point Transport related matters] To clarify the approach of off-site or splitting health centres Sensitivity tests required for a robust evidence-based Viability Assessment Uphold the strategy that each development must be able to proceed independently at its own speed, and where possible, shared infrastructure should be monetised to enable equalisation/equitable contributions. Seconded that short-term funding gaps to be sought from central government 	
63-3	Chantal Brooks	Brenchley and Matfield Parish Council			Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including	At the end of paragraph d), add "including in Brenchley and Matfield parish." This will make it clear that off-site mitigation measures should	<p>Appendix D: Proposed changes to Policy STR/SS1, Strategic Infrastructure d), e) and j) - unsound:</p> <p>Sub-paras d) and j) should make clear that mitigation of off-site highway impacts includes Brenchley and Matfield parish (apart from Kippings Cross) Traffic generated by proposed development at Paddock Wood and East Capel will have serious impacts on highways in Brenchley and Matfield</p>	

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					land at east Capel	extend into Brenchley and Matfield. Provide for mitigation measures to be installed in time to reduce the effects of construction traffic on Brenchley and Matfield	Improved bus services uncertain Rat running on historic rural lanes in National Landscape a concern Subparagraph e) fails to address traffic through Brenchley and Matfield during construction Solution: At end of paragraph d), add 'including in Brenchley and Matfield parish' (to ensure off-site mitigation measures) Provide mitigation measures to reduce effects of construction traffic on Brenchley and Matfield	
64-1	Adrian Pitts				4.1 Strategy and Implementation		Strategy and Implementation: <ul style="list-style-type: none"> Not against development but it must be limited and supported by infrastructure well before it starts PW needs a more vibrant town centre meeting everyday needs and not newly built development not benefiting locals Detrimental impact on mature hedgerows, trees and wildlife questioning the 'bulldozer to the countryside' approach instead of brownfield revisiting 	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83 . The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness. Policy STR/SS1 requires the detailed planning applications for each development parcel to be landscape led and responsive to their character and setting. They will also need to deliver net gain for biodiversity and retain/introduce landscaping/trees and open space within the schemes.
64-2	Adrian Pitts				Appendix A: List of Post Submission Evidence Base Documents		Appendix PS_063 Proposed Modifications to the Development Strategy, following Inspector's Initial Findings Letter: <ul style="list-style-type: none"> Lack of a cohesive strategy for both existing/planned developments with no beneficial gains Section 5: Strategic Sites: Tudeley Village and Paddock Wood, including land in east Capel – Much less specific than previous version and jeopardised by piecemeal residential developments at prime town centre restricting retail and social space here Ensure delivery as planned masterplanning before further granting permission at town centre vicinity 	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.

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							<ul style="list-style-type: none"> 200 brownfield sites permitted not attracting S106 funding need to be further consulted <p>Crime and Antisocial Behaviour</p> <ul style="list-style-type: none"> Significant increase in anti-social behaviour and vandalism. Little/no police presence in the town (police station demolished). Will get worse with more housing 	
64-3	Adrian Pitts				4.2 Initial Findings of the Inspector		Concern over the disregard for PW NDP, inclusive of the growth strategy and approach to town centre, causing inconsistency with its development plan and inadequacies in the Local Plan.	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Council's response to the Inspector's Initial Findings on the Local Plan.</p> <p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p>
64-4	Adrian Pitts				6 Infrastructure		<p>Structure and Infrastructure:</p> <ul style="list-style-type: none"> Concern town centre is not part of structure plan - welcoming centre providing places to socialise, eat out, a range of independent shops/businesses needed. Omission of town centre is a massive/damaging oversight. Building on Flood Zone 1, growth will be fractured and disconnected for the town centre leading to isolation, poor access to facilities and more car trips. Garden settlement principles not considered (unlike the Neighbourhood Plan) Infrastructure and utilities - no detail what is required and whether short/medium/long term plans being considered. No land available to expand waste water treatment works, already at fill capacity. Stated £230K for this upgrade seems inadequate. Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy: <ul style="list-style-type: none"> Sufficient local infrastructure (town centre, doctors surgery, transport links) Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities) 	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Council's response to the Inspector's Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The policy wording of STR/SS1, includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the</p>

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							<ul style="list-style-type: none"> ○ Flood zone 1 - additional water/sewage discharge not causing problems down stream • More joined up thinking needed for south east - more dispersed development, not too much in one place <p>Health:</p> <ul style="list-style-type: none"> • Indication there will be an off-site primary care provision in the short to medium term and a new Health Centre facility off-site in the long term. However, location not known and public transport not good • Current 3 developments in PW relied on Brenchley GP surgery (4 miles away) taking excess demand, but now closed to new patients from PW. No capacity at PW Woodlands Surgery. Nearby East Peckham surgery (Maidstone) now closed down. Also cuts to midwifery services (so new influx of babies taking up GP time) <p>Others:</p> <ul style="list-style-type: none"> • No provision for additional cemetery space 	<p>revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>Discussions have been ongoing with NHS regarding the revised strategy for the Strategic Sites and the proposed level of growth. The NHS has confirmed that a new satellite general practice surgery will be required within the growth area and discussions are ongoing regarding a Statement of Common Ground on this matter.</p>
64-5	Adrian Pitts				5 Transport related matters		<p>Transport related matters:</p> <ul style="list-style-type: none"> • Lack of employment opportunities coupled with poor public transport • Increase in population resulting in high air pollution from increased traffic • Vague road improvements, especially on the B2160 and Badsell Road/Maidstone Road junction and reduced budget for Colts Hill traffic improvements • Strong bias towards improving walking and cycling to detriment of vehicular access • Concern over making Maidstone Railway bridge one way • Lanes north of PW (Lucks Lane, Queen Street and Wagon Lane) becoming rat-runs with heavy vehicles raising safety and noise concerns, while A228 improvement will further exacerbates the traffic funnelling 	<p>The Employment Land Provision at Paddock Wood Paper (PS 045) sets out the context for the revised employment allocations at Paddock Wood which would provide economic growth to the area and help support the proposed growth.</p> <p>The review of transport modelling has been undertaken by consultants (PS 047, PS 048, and PS 049) which includes modal shift Impact reporting on the bases of the revised growth at Paddock Wood and land at east Capel.</p> <p>Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites,</p>

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								and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery. The councils 2019 AQ monitoring results show that the annual mean of NO2 measured from the diffusion tubes (located in Paddock Wood) are below the annual mean objective of 40ug/m3. Policy EN21 of the SLP deals with Air Quality that would be considered on a case by case scenario at the Development Management stage.
64-6	Adrian Pitts				4.8 Overview and Conclusions		Question the assessment of the availability of 'good range of existing services' mentioned in paragraph 4.62, and the conflicts of development taken place before infrastructure. Community involvement should be upheld in close relation to local groups, residents and community clubs (paragraph 4.63), e.g. in traffic and transport-related issues at A228 to Hop Farm roundabout and other local streets.	The Inspector comments at para 52 in his Initial Findings letter (November 2022)... "that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth". In terms of transport related issues, a review of transport modelling has been undertaken by consultants (PS_047 , PS_048 , and PS_049) which includes modal shift Impact reporting on the bases of the revised growth at Paddock Wood and land at east Capel.
64-7	Adrian Pitts				4.4 Flood risk and Housing		Flooding: <ul style="list-style-type: none"> • 37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned • No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street) • Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned • Gravelly Stream - causes serious concerns as it floods many properties located next to it. Also accepts diverted water from Tudeley Brook (FOG) which then affects capacity of culvert under railway and when full, floods properties in Ribston Gardens, Laxton Gardens etc. • TWBC considers wastewater, freshwater infrastructure and surface water as one issue with no understanding of the difference between these very different and very serious flooding issues for PW 	Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land. The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited

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							<ul style="list-style-type: none"> Existing homes in PW are more likely to be flooded because of more concreted ground in developed areas Only a matter of time before homes proposed on EA Flood Zone 1 areas are changed to Zone 2 or 3. New homes will be at far higher risk of flooding and higher insurance premiums 	within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
64-8	Adrian Pitts				4.7 Sports and Leisure provision		<p>Sports and Leisure provisions:</p> <ul style="list-style-type: none"> Inconsistent appraisal about the need for a new Sports Hub (from paragraphs 4.55, 4.58 and 4.56) Lack of understanding about current facilities and resort to a piecemeal shortsighted approach Lack of consultations with local residents and football club Inadequate and insufficient details as compared to the original structure plan's vision <ul style="list-style-type: none"> Putlands 'improvements' turned the rugby pitch into a car park, despite related flood risk and plan from PWTC making it a skate park Similarly, conflicts with plans to reinstate the Football team at Green Lane Lack of recognition for sports facilities at Memorial field, Elm Tree pitches <p>Hence demand a more robust and detailed sports strategy to ensure delivery rather than bits of improvements.</p>	The Strategic Sites (Master planning) Addendum paper (PS_046) sets out the high level of sport and leisure facilities which would be provided as part of the Strategic development. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054). Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.
64-9	Adrian Pitts				4.6 Education infrastructure provision		<p>Concerns over Education and Childcare:</p> <ul style="list-style-type: none"> Need for a 3FE (900 pupils) school and the proposals for it are noted, but plans for it are uncertain at this time, with the expansion of Mascalls likely result in multifaceted implications, from organisational issues to quality of education, accessibility/transport, burdens on neighbouring localities. Existing worrying education standards Vague progress on existing plans for Mascalls/primary school/secondary school and untransparent communication or agreements between KCC/TWBC/TMBC. School already planned has been put on hold due to insufficient numbers. More information/certainty needed. No consideration of preschool/nursery provision in Plan - need to provide for increased need 	The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS_046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new

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								school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum (PS_054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.
66-1	Andrea Ray				4.4 Flood risk and Housing		Unfair Paddock Wood earmarked for 50% of Borough's housing allocation when there are other available brownfield sites Inappropriate to build additional homes in flood zone	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PS_054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>In terms of Brownfield land, this has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83. The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness.</p>
66-2	Andrea Ray				4 Paddock Wood strategic growth		Paddock Wood GP surgery and pharmacy oversubscribed Recently increased crime in Paddock Wood - police station closed Too few shops/restaurants on high street	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Council's response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>The proposals retain appropriate levels of Infrastructure provision within the policy wording of STR/SS 1 following on from work</p>

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								<p>with Masterplanning Consultant (DLA) (PS_046). This includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>Discussions have been ongoing with NHS regarding the revised strategy for the Strategic Sites and the proposed level of growth. The NHS has confirmed that a new satellite general practice surgery will be required within the growth area and discussions are ongoing regarding a Statement of Common Ground on this matter.</p>
66-3	Andrea Ray				4.6 Education infrastructure provision		Inadequate primary school provision for Paddock Wood	<p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE primary schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town.</p>
66-4	Andrea Ray				4.7 Sports and Leisure provision		Putlands Leisure centre is pathetic	<p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out the high level of sport and leisure facilities which would be provided. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities including significant enhancements to Putlands (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p>
67-4	Andrew Stanley				4 Paddock Wood strategic growth		<p>Conclusions on preferred strategy option: Unsound:</p> <ul style="list-style-type: none"> • Terms 'housing need' and 'local need' used repeatedly - strange that Capel needed approx. 5,000 houses in a rural parish with only around 2,000 residents • Also strange that rural parish of Capel (in Green Belt/adjacent to AONB/parts in flood zone) requires 4,500 houses and other villages have no/minimal needs. Capel sacrificed to save Paddock Wood 	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128), as well as the revised position within the Development Strategy Topic Paper Addendum (PS_054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives</p>

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							<ul style="list-style-type: none"> Paddock Wood is already building 1,300 new houses when in reality they are being purchased by London Boroughs Housing numbers are advisory - TWBC has made no attempt to claim special circumstances despite AONB and Green Belt TWBC has failed to carry out Inspector's request to assess reasonable alternative sites, and has reviewed a narrow area to conclude nowhere else suitable for development 	<p>within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>In terms of Brownfield land, this has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83. The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness.</p>
68-2	Louise Goldsmith	Capel Parish Council			12 Conclusions on preferred development strategy option		Capel PC remains opposed to removal of land in East Capel from the MGB. Although reduction in housing numbers by approx. 1000, removal of proposed housing from Flood Zones 2 and 3 and location of employment land on Flood Zone 2 are welcomed, still considers Plan to be unsound on flooding and transportation grounds.	<p>The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>In terms of transport, further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p>
68-3	Louise Goldsmith	Capel Parish Council			Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		<p>Capel PC remains opposed to removal of land in East Capel from the MGB. Although reduction in housing numbers and removal of proposed housing from Flood Zones 2 and 3 are welcomed, still considers Plan to be unsound on flooding and transportation grounds. Flooding</p> <p>Existing surface water network around Paddock Wood at capacity in the PW Flood Alleviation Study 2015, nothing done to address this.</p> <p>EA sequential test for development in allocation of school site in Flood Zone 2 not satisfied.</p>	<p>The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>Many residential units in western part of East Capel allocation are in Flood Zone 1, surrounded by land in Flood Zones 2 and 3 (e.g. western quadrant of STR/SS 1 (B) slithers of land east and west of Tudeley Brook would be isolated in flood periods) - safe access/egress not addressed. Will worsen with climate change. Therefore questionable whether sufficient land is available for quantum of housing proposed.</p> <p>Groundwater flooding remains an issue - concern about NW part of site allocation along A228 (opposite Whetsted), where most of 717 homes are to be built. Flood zone modelling looks at fluvial flooding (from Tudeley Brook and other streams to west of PW), but not the issue of groundwater flooding. Not sure if proposed SUDs and attenuation ponds will be sufficient to deal with this. Could have detrimental impacts downstream.</p> <p>Road network and junctions</p> <p>3000 new homes will have serious traffic implications for Capel and implications unclear for A228 and surrounding rural roads including Five Oak Green (FOG) B2017 through FOG would need to be adapted for safe pedestrian/cycle movement, public transport, growth in traffic</p> <p>No objection to the proposed lower Colts Hill bypass (already needed without growth). Permission/funding should be in place before development starts</p> <p>Modal shift</p> <p>The masterplan for PW / EC requires significant infrastructure interventions - insufficient evidence to demonstrate deliverability</p> <p>Offsite travel network does not meet minimum design recommendations and relies on infrastructure that may not be provided e.g. rectifying unsafe walking routes between Paddock Wood and FOG</p> <p>Public transport strategy not sustainable as relies on in perpetuity subsidy which cannot be secured e.g. proposed figure of 8 bus service</p> <p>Non-transport infrastructure</p> <p>Important infrastructure be put in place before any properties are occupied - including expansion of health centre, new pharmacy, education provision</p> <p>Expansion of Paddock Wood</p> <p>New residents will be entitled to use the community facilities in Capel e.g. allotments. Capel section in the SLP (CA1) should be reviewed as an urgent matter as the PC</p>	<p>approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PS 054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>The review of transport modelling has been undertaken by consultants (PS 047, PS 048, and PS 049) which includes modal shift Impact reporting on the bases of the revised growth at Paddock Wood and land at east Capel. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS 053). A bus feasibility study (PS 058) has identified a number of improvements that can be made as part of the strategic delivery.</p> <p>The proposals retain appropriate levels of Infrastructure provision within the policy wording of STR/SS 1 following on from work with Masterplanning Consultant (DLA)</p>

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							strongly insists that money for allotments, community and leisure facilities be supplied via S106 agreements New development should comply with Capel NDP and design guide once adopted	(PS 046). This includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable. Enhancements requested by Town/Parish Councils, could be captured as part of detailed S106 discussions as part of the detailed planning app stage.
70-2	Dave Smith				Other Matters		The comments made in email rather than structured questionnaire to overcome the constraints in the scope and expression of views. Request to have the response from Paddock Wood Town Council (PWTC) to be duly recognised. Lack of communication with PWTC in compiling the consultation documents, though not REQUIRED, TWBC SHOULD NOT do so. FORMAL procedures recommended by Central Government, collaboration and consultation with neighbouring TCs should be abided by TWBC.	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council considers that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.
70-3	Dave Smith				4.4 Flood risk and Housing		Should not base decision of development on assumption flooding "might" be less likely.	The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
72-1		Gallagher Properties Ltd		DHA Planning	4.5 Employment land - review of options		Gallagher Properties Ltd consider that the amended plan is considered to be legally compliant but not sound in regard to section 4 and make the following points; Gallagher are promoting land at Swatland Farm at Lucks Lane, Paddock Wood for employment uses and benefits from outline planning consent, granted in January 2023. Following receipt of the Inspectors letter, further flood risk modelling work was carried out taking into account climate change allowance resulting in this site to be expected to	The Employment Land Provision at Paddock Wood Paper (PS 045) sets out the context for the previous employment allocations within the Submission Local Plan and the basis for these allocations referring to the conclusion of the Economic Needs Study . The allocations have been re-considered as part of the revised Strategic Sites strategy due to the conclusions of the further flood assessments carried out.

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							<p>be wholly within Flood Zone 3 by the end of the plan period. Nevertheless, the extant planning permission has appropriate drainage conditions attached to the permission which have been agreed with the LLFA and made allowance for climate change.</p> <p>The Inspector considered that the location of employment land should not be in areas at higher risk of flooding. Although the amended plan refers to this site as being a commitment in employment land terms and its recognition in meeting employment needs, it is not proposed to be allocated as such within the Northern Development Parcel E.</p> <p>Gallagher recognise that the site is still within the Key Employment Area and supports this approach, however it objects to the proposed exclusion of the site from the Northern Parcel. Gallagher refer to case law in support of their representation and the approach of relying on the site to meet employment needs of the plan, yet not allocating it as such within the plan.</p>	The comments regarding the revised employment strategy for Paddock Wood are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.
73-1		Owners of Land East of Transfesa		DHA Planning	4.5 Employment land - review of options		<p>The amended Local Plan is considered to be sound and legally compliant and in particular;</p> <p>Support the 20 acre parcel of land at Land East of Transfesa, Lucks Lane that forms part of the proposed employment site identified in Policy STR/SS1 (g). It is also within a Key Employment Area defined by Policy ED1 and part of the Northern Parcel in the SLP.</p> <p>In response to the Inspectors concerns about development within areas of higher flood risk and further modelling carried out by TWBC, taking into account climate change allowances - it is concluded that part of the site falls within a higher flood risk area and should not form part of the allocation - reducing the site area from 4.6ha to 4.2ha. Notwithstanding the reduction of the site area, the landowner is supportive of the approach of retaining Land East of Transfesa within the Key Employment Area and the LBD as set out within the amended plan.</p> <p>The landowner confirms that in drawing up more detailed proposals for the site, they will take account of the detailed masterplanning work carried out. they also confirm that the site is deliverable over the plan period for a mix of employment types and sizes.</p>	<p>The Employment Land Provision at Paddock Wood Paper (PS_045) sets out the context for the previous employment allocations within the Submission Local Plan and the basis for these allocations referring to the conclusion of the Economic Needs Study. The allocations have been re-considered as part of the revised Strategic Sites strategy due to the conclusions of the further flood assessments carried out.</p> <p>The comments regarding the revised employment strategy for Paddock Wood are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>
76-1	Donald Kent				4.4 Flood risk and Housing	There is no overlay between old and new masterplanning so it's unclear how one relates to the other when it comes to	Plan legally non-compliant and unsound - not compliant with NPPF regarding flood risk, failure to apply the sequential test and exception test.	The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy

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						sequential tests and proposed development sites. You do not take account of floodwater coming into paddock wood from Matfield/Brenchley and Pembury, this has never been addressed at source ie Matfield extra.	<p>Council acknowledge that there is severe flood risk constraint yet don't adequately address issue or provide evidence of appropriate mitigation.</p> <p>Inadequate information on sewage infrastructure</p> <p>Not clear of difference between old and new masterplanning and how flood risk constraints and measures have been applied.</p> <p>Flood risk from other areas has not been considered</p> <p>Differences between wastewater, sewage water and fresh water is not clear.</p> <p>Plan does not address existing flooding issues and culverts in Paddock Wood.</p>	<p>(Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>
77-1	ES Blackwell				4 Paddock Wood strategic growth	<p>Any modifications to the proposed Changes to the Borough Local Plan Submission need to state: who is responsible for infrastructure improvements and give a timescale for work to start from grant of planning permission.</p> <p>In addition land for a new sewage works and new health centre in PW must be allocated given that the existing sewage works is at capacity and the Woodlands Health Centre is closed to new applicants.</p>	<p>Plan legally non-compliant and unsound - due to the disparity between allocation of numbers of houses directed to Paddock Wood and Tunbridge Wells. In particular;</p> <p>Tunbridge Wells more appropriate as more brownfield sites, better infrastructure, public transport, services, facilities and employment.</p> <p>Significant improvements are required to mitigate impacts of the development when existing developments are having an impact.</p> <p>current infrastructure not adequate, including health and sewage.</p> <p>Plan must state who is responsible for infrastructure improvements and timescales for implementation.</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128), as well as the revised position within the Development Strategy Topic Paper Addendum (PS 054). The Green Belt assessment work is set out here, the potential impacts, as well as the rationale for removal of some land from the Green Belt. The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>The proposals retain appropriate levels of Infrastructure provision within the policy wording of STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS 046). This includes education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised</p>

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								viability appraisal work, however delivery of the infrastructure is considered achievable.
78-1	Fiona Gordon				4 Paddock Wood strategic growth		<p>There has been a lot of new development at Paddock Wood which has raised significant infrastructure issues and antisocial behaviour.</p> <p>Needs to be equal investment in the town alongside the housing with particular concern around;</p> <p>Health education - primary and secondary</p> <p>Need further investment alongside the housing growth.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including education, highways and connectivity, health, sports and leisure which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
79-1	Frank Kent				4 Paddock Wood strategic growth		<p>Disproportionate burden on Paddock Wood for the benefits of the whole Borough, which is unsuitable given the geographic constraints.</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided. The Council has revised the Strategic policy STR/SS1 to ensure the requirements of the policy are more specific in terms of elements of the schemes which are required on each development parcel. This also includes the extent of joint Masterplanning needed between developers where development parcels are adjacent. The Council has also been working with developers to ensure the delivery of the Strategic Sites is realistic both in terms of rates and associated infrastructure. The Inspector also comments at para 52 in his Initial Findings letter (November 2022)... "that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth".</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
79-3	Frank Kent				6 Infrastructure		<p>Concern over existing infrastructures:</p> <p>Sewage system and treatment functioning at full capacity as confirmed by Southern Water without proper measures. Also issue with overflowing onto the road during heavy rain, typically at Lucks Lane. Two local surgeries already not accepting new patients. Insufficient capacity of the cemeteries associated with high water levels. Accessibility to amenities, sports and leisure facilities require private transport.</p> <p>These demand an integrated approach before any new developments taken place. Also believe NPPF Changes (2023) to "local authorities now have greater flexibility" should follow to allow these specific challenges in Paddock Wood to carry more weight. The new sewage works mentioned by Redrow and Persimmon development at Queen Street flowing into Rhoden Stream has no published plan and impact mitigation measures.</p>	<p>Southern Water have been engaged directly throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p> <p>Paragraph 230 of the NPPF (19.12.23) requires that local plans that reached examination before 19.03.24 (which is the case for TWBC) will be examined under the relevant previous version of the Framework in accordance with the above arrangements.</p> <p>It is correct that the developer for the current planning app for Land East of PW (Redrow) has chosen to incorporate a new privately managed WWTW within their development to service the proposed dwellings. However, this is not a position which TWBC supports (and which it is highlighted the policy STR/SS1 refers to strategic infrastructure including waste water rather than the developments being individually serviced. Discussions have been ongoing with both the developer and Southern Water, since the submission of this application.</p>
79-4	Frank Kent				5 Transport related matters		Concern over widening Lucks Lane junction with Maidstone Road that only increases number of traffic despite weight restriction, and induce higher speed.	Swatlands Farm has benefitted from a grant of planning permission since the initial Local Plan hearings, although this was prior to the further flood assessment work having taken place. This development already provides the widening of the entrance to Lucks Lane, although the entrance to the development is then taken. HGVs would not continue along Lucks Lane to access the development.
80-1	Helen Sargison				4 Paddock Wood strategic growth		<p>Number of concerns raised, including;</p> <p>Has TWBC consulted with Paddock Wood Town Council</p> <p>Lack of infrastructure improvements alongside housing</p>	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The

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							<p>Number of houses planned for PW out of proportion with those planned for Tunbridge Wells Concern over amount of development and flooding Listen to local people</p>	<p>Council considers that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.</p> <p>The Council has set out the Borough wide spatial development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PS_054) which discusses the location for growth proposed.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
82-1	Alexander Christofis				4.4 Flood risk and Housing		<p>The Local Plan is flawed and failed to accord NPPF requirements for a safe and sustainable development pertinent to flood risks. Paddock Wood suffers from upstream water in Capel Parish, which issue is disregarded in the plan. E.g. water from Tudeley Brook Stream in Five Oak Green divert into Gravelly Stream, filling the culvert under the railway and flooding the surrounding Ribston Gardens, Laxton Gardens up to Badsell Road.</p>	<p>The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The Inspector also comments at para 52 in his Initial Findings letter (November 2022)...”<i>that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a ‘logical choice’ for growth</i>”.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
82-2	Alexander Christofis				4.7 Sports and Leisure provision		Concern over the removal of sports hub likely serving not only sports club but local community groups, affecting the health well-being that is the key to the plan moving forward	<p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>In place of this, proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p>
82-3	Alexander Christofis				6 Infrastructure		<p>Concern over the exclusion of Paddock Wood town centre in much need of improvement and regeneration that goes against PWTC's own plan. Infrastructure improvement plan is needed for additional 2,600 new homes planned:</p> <p>Better road for accessibility and increased traffic. Also to consider a green agenda, given how TWBC failed to deliver cycle lane to Tonbridge earlier Rebuilt modern high street</p> <p>New primary and secondary schools</p> <p>New doctor surgeries</p>	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
82-4	Alexander Christofis				4 Paddock Wood		<p>Object to the Local Plan on the grounds of :</p> <p>Failure to speak to local residents in Paddock Wood</p>	<p>The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
					strategic growth		Irrational house allocation on flood plain that already struggle to sustain and contentiously close to neighbour's borough resulting in further issues	<p>revise the Strategic Sites strategy. The Council considers that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.</p> <p>The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p>
83-1	Anja Ennis				4 Paddock Wood strategic growth		Sign the Plan is inadequate if needing to be reviewed in 5 years. Use resources to make Plan fit for today	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>
83-2	Anja Ennis				6 Infrastructure		<p><i>[TWBC: the representation should be read in conjunction with Representation #169 from PWTC for the relevant cited contents]</i></p> <p>Concerns over Infrastructure required with regard to STR/SS 1:</p> <ul style="list-style-type: none"> Inadequate doctor surgeries <i>[TWBC: see Health facilities point in detail below]</i>, schools despite the enactment of previous Local Plan <i>[TWBC: Local Plan adopted 2006]</i> 	<p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised</p>

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							<ul style="list-style-type: none"> Lack of retail and commercial space, shops and restaurants, which risk losing to further residential purposes, e.g. Churchill Homes, houses on Station Road, etc. Rising antisocial-behaviours, crimes and vandalism Lack of consideration to the hedgerows and displaced wildlife, questioning the 'bulldozer to the countryside' approach instead of brownfield revisiting Disregard PW town centre in the PW Structure Plan and the need for existing facility improvement, while providing a subsequent silo SPD would be a disintegrated approach and massive oversight Lack of the granularity of details in the plan, e.g. short term/medium/long term, etc. Inadequate Viability Appraisal <p>Concerns over Healthcare Infrastructure in particular:</p> <ul style="list-style-type: none"> Proposed off-site primary care provision with poor accessibility and public transport Reliance on neighbouring surgeries that limited PW residents Long waiting time at Woodlands surgery District and midwifery services no longer operated hence demand falls back on GP Unfriendly appointment system particularly for the elderly <p>Other concerns associated with Infrastructures:</p> <ul style="list-style-type: none"> Lack of cooperation with neighbouring LPA Unfair relocation of London councils' resident to PW Lack of new cemetery provisions 	<p>viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>Discussions have been ongoing with NHS regarding the revised strategy for the Strategic Sites and the proposed level of growth. The NHS has confirmed that a new satellite general practice surgery will be required within the growth area and discussions are ongoing regarding a Statement of Common Ground on this matter.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p>
83-3	Anja Ennis				4.4 Flood risk and Housing		<p>[TWBC: the representation should be read in conjunction with Representation #169 from PWTC for the relevant cited contents]</p> <p>Concerns over housing development with regard to flood risk:</p> <ul style="list-style-type: none"> Fractured development in Flood Zone 1 against the Garden Settlement Principles by PW NDP making detrimental social impact and disintegration Flawed development strategy and non-compliant to NPPF regarding flood risks Disregard upstream flood originating from Capel Parish Inadequately address the sewage pressure from new developments or Lucks Lane plant Inadequately address existing Flood Zone 3 properties flood risks neglecting more intense rainfall (37% from climate change) Lack of tailored approach for wastewater, freshwater and surface water Damp problems 	<p>The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> Increase of concreted surface restricting water absorption hence more flooding and eventually Flood Zone 1 worsens to 2 or 3. 	data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.
83-4	Anja Ennis				5 Transport related matters		<p>Concerns raised with regard to sustainable transport at Paddock Wood, in particular;</p> <p>Lack of employment opportunities coupled with poor public transport.</p> <p>Increase in population resulting in high air pollution from increased traffic.</p> <p>Vague road improvements, especially on the B2160 and Badsell Road/Maidstone Road junction and reduced budget for Colts Hill traffic improvements</p> <p>Strong bias towards improving walking and cycling to detriment of vehicular access</p> <p>Concern over making Maidstone Railway bridge one way</p> <p>Potential solutions proposed including;</p> <p>Traffic restrictions in certain areas Dualling of A228 roundabout Blocking up Lucks and Wagon Lanes Blocking up Queen Street and Willow Lane Access into and out of the town centre</p>	<p>The Council has carefully considered public transport options as an integral part of the transport enhancement delivered through the Strategic development. Sustainable transport modes are a fundamental part of achieving a model shift for some trips away from the private car. As such, the Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents List), which formed part of the evidence for the Submission Local Plan 2021 (3.128). This sets out the key routes and connections through Paddock Wood and the enhancements needed to improve their usability.</p> <p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p>
83-5	Anja Ennis				4.7 Sports and Leisure provision		<p>Concerns over Sports and Leisure provisions:</p> <ul style="list-style-type: none"> Inconsiderate removal of the anticipated Sports Hub from the plan without two-way dialogue Putlands 'improvements' turned the rugby pitch into a car park, despite related flood risk and plan from PWTC making it a skate park Similarly, conflicts with plans to reinstate the Football team at Green Lane Lack of recognition for sports facilities at Memorial field, Elm Tree pitches 	<p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>In place of this, proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.
83-6	Anja Ennis				4.6 Education infrastructure provision		<p>Concerns over education provisions:</p> <ul style="list-style-type: none"> • Mascalls capacity for expansion of 3 or 4 Form Entry (FE) with the secondary school constrained by viability and need further details from KCC • Vague primary school plan, while the existing planned one is on hold and the PW Primary School is at capacity • Accessibility reliance on driving for alternative schools • Uncertainty about the original site allocation for the second primary school • Uncertainty about the medium-term 2x2 FE primary schools • Lack of preschools and nurseries 	The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS_046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum) (PS_054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.
83-7	Anja Ennis				Other Matters		Lack of police presence while crimes, vandalism, antisocial behaviours are on the rise.	The Strategic development parcels are being masterplanned and will be of a high level of

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								design. This includes creating safer streets/neighbourhoods and fully integrating the developments within the local community. The necessary infrastructure in terms of education, highways and connectivity, health, sports etc will be delivered to support the growth proposed, and further contributions to community projects could also be secured.
83-8	Anja Ennis		0		4.5 Employment land - review of options		More warehousing/freight delivery employment land without proper road improvement (A21, E228, etc.), causing poor accessibility to amenities and other infrastructures.	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047 , PS_048 , and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.
84-1	Ashley Kilby				6 Infrastructure		Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy: Sufficient local infrastructure (town centre, doctors surgery, transport links) Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities) Flood zone 1 - additional water/sewage discharge not causing problems down stream Other: More joined up thinking needed for south east - more dispersed development, not too much in one place 37% increase in rainfall because of global warming a concern downstream	The Council has continued discussions with neighbouring LPA's, updating them on our proposed strategy and relevant key matters. The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable. The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.

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84-2	Ashley Kilby				4.4 Flood risk and Housing		<p>Flooding/sewage:</p> <p>37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned. No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street).</p> <p>Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned.</p>	<p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>
84-3	Ashley Kilby				5 Transport related matters		<p>Traffic concerns:</p> <p>A21 Matfield junction and Colts Hill already at peak capacity</p> <p>Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse.</p> <p>Suggested solutions:</p> <p>Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road)</p> <p>Dualling of A228 to Hop Farm roundabout.</p> <p>Block up Lucks and Waggon Lane and their railway bridges and use speed reduction measures.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p>
84-4	Ashley Kilby				4 Paddock Wood strategic growth		<p>Existing sitting surface water and floodplain issues will be exacerbated in close proximity to homes and on local roads.</p> <p>Sign the Plan is inadequate if needing to be reviewed in 5 years. Use resources to make Plan fit for today.</p> <p>Detrimental impact on hedgerow, mature trees and wildlife.</p> <p>Paddock Wood is bearing a disproportionate amount of development despite its specific constraints.</p> <p>More detail needed about sewage system and proposed new sewage works to serve new developments. Should be provided before development.</p> <p>Widening of Lucks Lane/Maidstone Road junction will increase traffic and encourage higher speeds</p> <p>More integrated approach needed for facilities - sports provision and GPs.</p> <p>Insufficient cemetery capacity.</p>	<p>The further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.
86-2	Charles Rosenmeyer				5 Transport related matters		<p>Concern over increased traffic movement - passenger, delivery and logistics. Objector raises concerns over a number of specific junctions/road including;</p> <p>Main links to access Paddock Wood are from the A26, A228 via other routes including the M20 and the A21. Urgent need for bypass at Colts Hill as well as sections on the M20 to Mereworth Local routes which are often flooded and incapable of improvement. The expansion of Longfield Road Industrial estate in Tunbridge Wells will add to the traffic problems. Restricting access to Hartlake Road between Tudeey and Golden Green should not take place until improvements carried out on the A26. Need improved and expanded parking at Paddock Wood to cater for increased numbers of commuters as well as at Tonbridge. Roads need to be improved between Paddock Wood and Tonbridge including at Five Oak Green and Tudeley.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p> <p>The Kingstanding Business Park development (which received planning permission in 2021) includes a detailed S106 legal agreement setting out it's own highway mitigation measures separate from those which are necessary as part of the Strategic Sites proposed.</p>
86-3	Charles Rosenmeyer				4 Paddock Wood strategic growth		<p>Object to the proposed development at Paddock Wood, without the necessary infrastructure. Building on areas of floodplain are also not acceptable and may cause additional flooding in other areas like Yalding. It is also considered that major investment will be needed to improve the sewage infrastructure.</p>	<p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1</p>

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								land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. Southern Water have confirmed that capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.
86-4	Charles Rosenmeyer				6 Infrastructure		Raises concern about existing poor gas and electricity infrastructure as well as internet and mobile phone services.	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health, sports etc. This also includes utilities and discussions have been ongoing with the utility providers regarding how the growth could be serviced.
87-1	Christopher and Jean Blackburn				6 Infrastructure		Concerns with regards to the proposed development at Paddock Wood due to the following; No infrastructure to support the additional 2000+ dwellings. Current infrastructure can't cope and so won't cope with any increase. Concern over health and education provision any additional costs should be met by the developer and not local rates.	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
87-2	Christopher and Jean Blackburn				4.4 Flood risk and Housing		Concern that increased risk of further flooding which seems to have worsened over the last couple of years.	Further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan. The Inspector in his initial findings, directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.

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								Provision of flood attenuation features would also be incorporated, to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.
87-3	Christopher and Jean Blackburn				Other Matters		Considers that there has been a lack of consultation on the plan with both local residents and the Paddock Wood Town Council.	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council has also conducted extensive consultation on the Submission Local Plan as well as on the revised Strategic Sites strategy at the beginning of this year.
88-1	David Ebdon				6 Infrastructure		<p>Although acknowledge Green Belt and Flood Risk constraints, Lack of evidence of TWBC working with neighbouring LA's to deliver development targets. Development should take account if;</p> <p>Local infrastructure capacity - Town Centre, health, transport. Demand for where people want to live Flood risk 1 with additional sewage discharge capacity. Understand not current demand for the homes being built and London Councils are relocating people to PW. Issues of rising damp in new buildings. no mention of 37% increase in rainfall expected as a result of global warming.</p>	<p>The Council has continued discussions with neighbouring LPA's, updating them on our proposed strategy and relevant key matters.</p> <p>Further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan (which also includes modelling for climate change).The updated data has directly influenced the revised development zones (i.e. flood zone 1 land only proposed for development where flood impact is lowest) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p>
88-2	David Ebdon				4.4 Flood risk and Housing		<p>Number of concerns raised including;</p> <p>No mention of 37% increase in rainfall expected as a result of climate change. No mention of rainwater run off from Brenchley and Matfield and impact on developments down stream. Mitigation not clear fir existing zone 3 developments south of the railway lane. Concern about dealing with sewage water and increasing capacity. Concern about the culvert under the railway line No realistic solutions.</p>	<p>Further flooding assessment and modelling work carried out for land at Paddock Wood and East Capel comprises an updated position compared to the Submission Local Plan (which also includes modelling for climate change).The updated data has directly influenced the revised development zones (i.e. flood zone 1 land only proposed for development where flood impact is lowest) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>The housing development currently under construction in Paddock Wood, have their own surface and foul water strategies which were approved at the time of planning permission, in discussion with EA and KCC (as lead local flood authority).</p>

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								The Council has also continued discussions with Network Rail
88-3	David Ebdon				5 Transport related matters		<p>Concern over increase in traffic as a result of development particularly in regard to;</p> <p>Colts Hill already at capacity and will get worse Existing traffic jams from Matfield to A21 will get worse New development already has caused increased use of lanes north of Paddock Wood causing maintenance, health and safety concerns Traffic speeds are excessive with impact on community and safety Number of suggested solutions including - traffic restrictions from new developments on Queen Street - funnelling traffic to Badsell Road as well as dualling of A228 Hop Farm roundabout. Blocking up Lucks and Waggon Lanes and/or speed bumps and blocking up Queen Street and Willow Lane.</p>	<p>The review of transport modelling has been undertaken by consultants (PS_047, PS_048, and PS_049) which includes modal shift Impact reporting on the bases of the revised growth at Paddock Wood and land at east Capel. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.</p>
88-4	David Ebdon				4 Paddock Wood strategic growth		<p>Sign the Plan is inadequate if needing to be reviewed in 5 years. Use resources to make Plan fit for today.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>
89-1	David Marriott				4.6 Education		<p>Concern in regard to the location of the proposed secondary school site falling within an area of flood risk</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS_046) outlines that a 3FE secondary requirement would be</p>

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					infrastructure provision		and has been prone to flooding for many years. Photos and plan attached to demonstrate this fact.	<p>generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1. The school building itself would be positioned within flood zone 1, with its associated land and playing fields within flood zone 2. This is a common land arrangement for schools and has been accepted in principle by KCC (as Education Authority).</p> <p>The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum (PS_054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.</p>
90-1	Axiom Developments			DHA Planning	4 Paddock Wood strategic growth		<p>The amended plan is considered to be legally compliant but not sound in regard to the Employment Land - review of options in relation to Policy STR/SS1 and Paragraph 4.30 to 4.35.</p> <p>Axiom developments have concerns regarding the soundness of the revised strategy.</p>	<p>These comments regarding the revised employment strategy for Paddock Wood are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>
90-3	Axiom Developments			DHA Planning	4.5 Employment land - review of options		<p>The amended plan is considered to be legally compliant but not sound in regard to Table STR 1 and STR/SS1 and specifically Table 5 in Appendix C due to the following;</p> <p>Revised strategy proposes a reduction in the employment land proposed for PW. Although Colebrooke Park is located on edge of RTW rather than PW, the changes are still relevant.</p> <p>Acknowledge the implications of the Inspectors findings on employment floorspace at PW, the Climate changes allowance and the revised strategy for PW.</p> <p>Axiom consider that the revised employment allocations in PW would weaken the market choice for businesses looking to expand or relocate in the borough.</p> <p>Consider that the removal of land for employment purposes at PW, means that should re-consider the decision not to remove Colebrooke Park from the Green</p>	<p>These comments regarding the STR/SS1 and the revised employment strategy for Paddock Wood are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Minor Mods process.</p>

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							<p>Belt. This site should be included to help meet a range of employment needs in the borough.</p> <p>The Colebrooke Park site could provide an opportunity for leisure based employment to meet commercial needs. Original office plans no longer as suitable due to market conditions etc.</p> <p>Interest in the site from David Lloyd Leisure offering a bespoke health and leisure offer and genuine interest in the site. The unique circumstances of the site would be well suited for the use proposed and a number of benefits it could bring.</p> <p>The Council should consider removing the site from the Green Belt and allocating it for leisure based employment uses, particularly in light of the reduced employment floorspace now proposed at PW.</p>	
92-3	Greg Clark MP				6 Infrastructure		<p>Concern raised with regard to the provision of infrastructure which should be provided before expansion, in particular, the lack of the proposed sports hub at Paddock Wood.</p> <p>The new Colts Hill Bypass not being provided before or even at the same time as development.</p> <p>Explicit requirements for school places, doctors surgery capacity and flood relief.</p>	<p>The Council considers appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>The proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p> <p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the</p>

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								<p>rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p> <p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.</p>
97-1	Wrenbridge and Lambert and Foster	Wrenbridge and Lambert and Foster		ICENI Projects	4.5 Employment land - review of options		<p>Amended Plan is considered to not be sound in regard to Policy STR/SS1 - removal of Keyland Farm as an allocated employment site for the following reasons;</p> <p>The proposed removal of Keylands Farm as an allocated employment site from the plan is not justified and therefore unsound.</p> <p>Need to re-consider the balance of housing and employment provision at Paddock Wood. and IcenI have prepared a report in response to this.</p> <p>It is considered that Keylands farm, along with Swatlands Farm, form a logical extension to the Key Employment Area in this location, alongside other employment allocations in order to create a successful and sustainable employment location.</p>	<p>These comments regarding the revised employment strategy for Paddock Wood are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings.</p> <p>The Employment Land Provision at Paddock Wood Paper (PS_045) sets out the context for the previous employment allocations within the Submission Local Plan and the basis for these allocations referring to the conclusion of the Economic Needs Study. The allocations have been re-considered as part of the revised Strategic Sites strategy due to the conclusions of the further flood assessments carried out.</p>

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							<p>Flood risk - It is Iceni's view that the site has passed the sequential test in regard to the location of employment development and both the EA and KCC have signed a SOCG, with the EA considering that development in flood risk terms is acceptable on these sites for employment purposes alongside flood mitigation.</p> <p>Economy - Updated consideration by Iceni, using Census data shows that there is a broad balance between jobs in the PW area and the size of the workforce/residents in work, with no significant in/out commuting in net terms and it is considered sensible to plan on the basis of maintaining this balance which has multiple benefits.</p> <p>Profile of employment - Iceni have also carried out a analysis of the type of employment in Paddock Wood - employment in industrial activities is the largest broad sector grouping in PW. In terms of skills, the skills profile is not as strong as other areas in the borough, but residential growth proposed for PW provides an opportunity to broaden the skills profile.</p> <p>Inspectors findings - The Inspector agreed with the strategy to focus growth around Paddock Wood and agreed that the allocated parcel did not need to be automatically discounted because it contains different flood zones but felt that insufficient information had been provided to justify the allocation of land at risk of flooding in accordance with the sequential test.</p> <p>Updated evidence - Iceni have not scrutinised the further work carried out - flood modelling and masterplanning, but do not consider that it affects the comments made by the Inspector.</p> <p>Homes and employment balance - Iceni has carried out its own research into the reduced scale of residential growth proposed and the alignment of this with employment land provision and provided modelling and made forecasts for calculating B class needs - identified to be between 17-17.8 hectares and so higher than that forecast by the Council reflecting the nature of employment needs at Paddock Wood.</p> <p>Two key factors determine this difference - proportion of b-class jobs and plot ratio's.</p> <p>The reduced amount of employment land proposed by the Council could limit scope for employment growth and could result in out-commuting from PW. Iceni consider that there is clear justification for a higher amount, notwithstanding the flood constraints identified.</p> <p>Meeting the need - Keylands has been removed as an allocation due to it falling in flood zone 2 and 3 and not be within the Key Employment Area. However, Iceni state that there is nothing in policy that states that employment uses cannot be location in flood zones 2 and 3 as long as the sequential test is passed which leni considers it has.</p> <p>There are no sequentially preferable sites identified within PW.</p>	<p>The conclusions show that previously proposed employment allocations to the north of Paddock Wood would fall within Flood Zone 2/3 (based on upperend climate change modelling). This includes Keylands Farm and Swatlands Farm which have now been removed as allocations as part of the revised Strategic Sites strategy due to this flooding impact and in view of the Inspector's comments regarding development outside of flood zone 1. The employment allocation now proposed to the East of Transfesa is largely outside of flood zones 2/3 and measures are capable of being introduced to ensure safe and suitable access as well as any necessary flood mitigations. The employment areas could comprise a range of uses focusing on B employment uses given the site context etc which is likely to be most suitable and would meet the borough need.</p>

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							Also concerns about the location of the Key Employment Area designation on land to the north of the railway line. It is considered that it should be removed on land immediately north but extended further north to include Swatlands and Keylands.	
98-1	Isobel Golding				4.8 Overview and Conclusions		Paddock Wood Neighbourhood Plan mostly ignored More new housing in Paddock Wood unacceptable when existing new housing developments remain unsold - as unaffordable. Report S6.6 indicates town centre not being considered but should be.	The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan and has been engaging with them over the proposed changes to the development strategy as set out in policy STR/SS1. The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).
98-2	Isobel Golding				6 Infrastructure		There is insufficient local infrastructure within Paddock Wood to support further growth, in particular; Primary medical provision; Sports facilities; Shops; Parking for commuters; Buses; Sewage infrastructure. Flooding is also a particular issue in Paddock Wood	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
99-1	Jacqueline Leman				6 Infrastructure		Concern that additional housing proposed without associated infrastructure. In particular; Although reduced allocation at PW, but no cohesive plan for infrastructure - roads, water and sewage, parks and leisure facilities, education, shops and restaurants. The Paddock Wood Neighbourhood Plan has not been taken into account. Concern that most new housing will have very small gardens and lack of supporting leisure and recreational infrastructure such as swimming pool, climbing walls, gymnastics facilities, large parks and recreation grounds and so will be the need to travel to Tonbridge and Tunbridge Wells for such facilities.	Whilst the Strategic development sites at PW are being developed by different developers and may come forward at different times, they are being masterplanned as a collective which is set out within The Strategic Sites (Master planning) Addendum paper (PS 046) This ensures the key connections are included and the development parcels integrate with one another. This document also sets out that the growth areas would include local centres which would provide convenience stores and opportunities for small businesses. New sports provision locations are also included which includes significant enhancements to Putlands for indoor sports as well as two other areas for significant outdoor sport facilities. In terms of infrastructure, education, highways and connectivity, health, sports etc services will be delivered to support the growth. (table 8 of the above referenced Masterplanning Document) sets out a clear list of infrastructure which is necessary to support the growth planned. TWBC have gone through detailed viability testing to determine that the level of necessary

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								infrastructure for PW can be delivered through S106 from development.
99-2	Jacqueline Leman				5 Transport related matters		Concern over existing heavy traffic and associated pollution on a number of key roads within the area, including Matfield to the A21, at Kippings Cross, Pembury Road and the B2017 to Tonbridge through Five Oak Green and Tudeley. Many of the roads accessing Paddock Wood are country lanes and not suitable for increased traffic making it difficult to walk anywhere.	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047 , PS_048 , and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.
99-3	Jacqueline Leman				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		Consider that a review of the whole area of Paddock Wood should be carried out in order to better plan for the next 10 years if Paddock Wood has to expand.	The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'. The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.

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100-2	James Whitehorn				5 Transport related matters		<p>The amended plan is not considered to be sound in regard to Paddock Wood strategic growth;</p> <p>Highway infrastructure on primary routes through Royal Tunbridge Wells is already over capacity for much of the day and especially at peak hours. Additional growth in housing proposed will add around 17,000 extra cars to the already overloaded network. Challenging the fundamental assumptions about housing needs in the borough.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed including the level of journeys at peak hours. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p>
101-1	Jason Dennis				6 Infrastructure		<p>Concern over the amount of new housing proposed for Paddock Wood, particularly in light of;</p> <p>the removal of the Sports Hub from the plans existing sports pitches flood and need to be upgraded and drainage improved</p> <p>If development is to take place then the relevant infrastructure needs to be included - schools, medical and sport. Also comparison to facilities at Kings Hill as part of housing development.</p>	<p>The OAN has been reviewed as part of this exercise and is set out in the Development Strategy Topic Paper Addendum (PS 054) Section 11. The OAN as set out in the paper identifies a marginal reduction to 667 dwellings per annum.</p> <p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>Revised policy STR/SS 1 states under Strategic Infrastructure criterion e) The delivery of necessary infrastructure shall be informed by ongoing discussions with relevant stakeholders, including Kent County Council and adjacent local authorities (Tonbridge & Malling and Maidstone Borough Councils) and other relevant statutory consultees and be kept under review throughout the planning stages of the development.</p>
102-1	Jeremy Thompson				6 Infrastructure		<p>Concern that little improvement in infrastructure and facilities with the exception of three lane running track - with plans to extend to 6 lanes. Community centre on the Memorial Playing Field although not considered to be the right site.</p>	<p>Revised policy STR/SS 1 states under Strategic Infrastructure criterion e) The delivery of necessary infrastructure shall be informed by ongoing discussions with relevant stakeholders, including Kent County Council and adjacent local authorities (Tonbridge & Malling and Maidstone Borough Councils) and other relevant statutory consultees and be kept under review throughout the planning stages of the development.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								The Council considers appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS 046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS 054).
102-2	Jeremy Thompson				Other Matters		Engagement; No reference to Paddock Wood Neighbourhood Plan in Local Plan documentation Non-compliance with TWBC Statement of Community Involvement - recognising needs of community groups/involvement Little engagement with Paddock Wood Town Council (PWTC) since Local Plan hearings - need to listen/work with residents and PWTC	The Council has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. The Council considers that a close working partnership with local groups is beneficial for the delivery of enhanced services and sustainable growth with a high level of design.
102-3	Jeremy Thompson				4.8 Overview and Conclusions		Although Paddock Wood might seem suitable for further housing growth, it is considered not to be due to the following; Flooding; Lack of infrastructure; Transport Lack of essential facilities e.g. doctors, dentists. Also the town centre is not part of the structure plan and should be included	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Council's response to the Inspectors Initial Findings on the Local Plan. Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
102-4	Jeremy Thompson				5 Transport related matters		Concern raised over impact on climate change and impact of new development increasing vehicle movements and adding to congestion with no plans for efficient and affordable bus network to connect Paddock Wood to Tunbridge Wells, Tonbridge or Maidstone.	The SLP (CD 3.128) is supported by a suite of policies many of which deal with Climate Change, in particular EN1 Sustainable Design, EN2 Sustainable Design Standards, EN3 Climate Change Mitigation and Adaptation.
102-5	Jeremy Thompson				4.7 Sports and Leisure provision		Revised strategy for sports and leisure is unsatisfactory and the plans for Putlands, loss of playing fields and the additional car parking is flawed and not acceptable.	Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.
103-1	Jo Copper				6 Infrastructure		Raised number of concerns including;	The Strategic Sites Masterplanning and Infrastructure Study Paddock Wood Growth Follow-on Study (PS 046) sets out the level of

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							Every space is being used for housing and need other community services and facilities. Concerned about infrastructure capacity for education and health. Flooding that is already evident in Paddock Wood.	infrastructure need required for the growth at Paddock Wood and land at east Capel as part of a revised policy SS/STR 1. The DSTPA (PS_054) sets out the revised requirements for primary and secondary education needs which are both accommodated with the revised policy allocation. A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations.
103-2	Jo Copper				4.8 Overview and Conclusions		Object to the fact that Paddock Wood is taking the majority of new housing within the borough and needs to include major changes and investment.	The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'
103-3	Jo Copper				5 Transport related matters		Poor transport links and roads are busier and not maintained.	Paddock wood is well served by transport links, having a railway station with links to Tonbridge, London, and Ashford, regular bus routes and infrastructure, and easy access to the Strategic Road network.
104-1	Jonathan Easteal				4.4 Flood risk and Housing		Unsound strategy - residential buildings on Flood Zone 1 and Employment ones in Flood Zone 2 - owing to: The representor owned house and surrounding roads in Flood Zone 3 situation to be worsen Concerns over the increased flood risks in Paddock Wood set out by the Environment Agency (EA), prompting another re-classification into Flood Zone 2/3 later with proposed properties in place? Overuse of land given less development proposed from the original local plan, should require less if the plot size is the same?	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
104-2	Jonathan Easteal				4 Paddock Wood strategic growth		The Local Plan in relation to Paddock Wood (PW) is Legally Non-compliant and Unsound: Insufficient efforts in seeking suitable sites despite the deletion of Tudeley Village and the Inspector's request, still overburdening PW with ill-thought proposals despite lower housing (e.g. extra secondary school). Infringement on Green Belt around PW leading to loss of green spaces.	The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>More thoughts required for the capacity of health, education, sewage, transit, parking and quality of life provisions.</p> <p>"duty to consult"; believed to be breached without consulting PWTC and own NDP.</p> <p>(See objection to planning for flood risk in the related Consultation Point, and submission no 158: Stop Over Development of Paddock Wood for more details)</p>	<p>A Green Belt Study 3 Addendum report (PS 035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD 3.77 and PS 036) has indicated that all available sites have been utilised in the plan.</p> <p>The Council undertook necessary Consultation will all relevant stakeholders including PWTC.</p>
105-1	Josh Kilby				6 Infrastructure		<p>Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy:</p> <p>Sufficient local infrastructure (town centre, doctors surgery, transport links)</p> <p>Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities)</p> <p>Flood zone 1 - additional water/sewage discharge not causing problems down stream</p> <p>Other:</p> <p>More joined up thinking needed for south east - more dispersed development, not too much in one place. 37% increase in rainfall because of global warming a concern downstream.</p>	<p>The Council has undertaken significant engagement as part of the preparation of the local plan as set out in the Duty to Cooperate Statement (CD 3.132 - see the Core Document List) which was acknowledged in the Inspectors decision to proceed to stage 2 of the examination (ID-08).</p> <p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p>
105-2	Josh Kilby				4.4 Flood risk and Housing		<p>Flooding/sewage:</p> <p>37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned. No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street).</p> <p>Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned.</p>	<p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1.</p>
105-3	Josh Kilby				5 Transport related matters		Traffic concerns:	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>A21 Matfield junction and Colts Hill already at peak capacity. Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse.</p> <p>Suggested solutions:</p> <p>Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road) Dualling of A228 to Hop Farm roundabout. Block up Lucks and Waggon Lane and their railway bridges and use speed reduction measures.</p>	<p>outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.</p>
105-4	Josh Kilby				4 Paddock Wood strategic growth		<p>Do not agree with the approach to continue with the Local Plan and review in 5 years or the focus on greenfield development - should be looking at brownfield sites. Number of general comments raised including;</p> <p>Unaware of the consultation until recently advised by PWTC. Statements used which are not understood by the wider public such as 'active travel'. NPPF allows greater flexibility which should be taken into account in local decisions. Disproportionate amount of development being directed to Paddock Wood. Concern over infrastructure provision including - Sewage system being at capacity, health provision, cemetery space, road junction capacity.</p>	<p>Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83</p> <p>The Council has undertaken a full consultation on its response to the Inspectors Initial Findings letter on the Local Plan.</p> <p>Annex 1 of the NPPF (19.12.23) states that for the purpose of plan making 'The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements' (para 230).</p> <p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p> <p>Revised master planning has been undertaken to accommodate a reduced amount of growth at STR/SS 1 which has included making sure adequate infrastructure provision is included in the proposals.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
106-1	Jude Singleton				4 Paddock Wood strategic growth		<p>Flooding - existing sitting surface water and floodplain issues will be exacerbated in close proximity to homes.</p> <p>Other points:</p> <p>Sign the Plan is inadequate if needing to be reviewed in 5 years.</p> <p>Detrimental impact on hedgerows, mature trees and wildlife.</p> <p>Paddock Wood is bearing a disproportionate amount of development despite its specific constraints.</p>	<p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1.</p> <p>The Council response to change the development strategy in regard to Tudeley Garden Village (STR/SS 3) and Paddock Wood and land in east Capel (STR/SS 1) will necessitate an immediate review of the plan. This is set out in the Development Strategy Topic Paper Addendum (PS_054).</p> <p>The SLP includes suite of policies to protect, amongst other things, hedgerows, trees and wildlife (EN1, EN9, EN10).</p> <p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p>
106-2	Jude Singleton				6 Infrastructure		<p>Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy:</p> <p>Sufficient local infrastructure (town centre, doctors surgery, transport links).</p> <p>Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities).</p> <p>Flood zone 1 - additional water/sewage discharge not causing problems down stream.</p> <p>Other:</p> <p>More joined up thinking needed for south east - more dispersed development, not too much in one place.</p> <p>37% increase in rainfall because of global warming a concern downstream.</p> <p>More detail needed about proposed new sewage works to serve new developments.</p>	<p>The Council has undertaken significant engagement as part of the preparation of the local plan as set out in the Duty to Cooperate Statement (CD 3.132 - see the Core Document List) which was acknowledged in the Inspectors decision to proceed to stage 2 of the examination (ID-08).</p> <p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1.
106-3	Jude Singleton				4.4 Flood risk and Housing		<p>Flooding/sewage:</p> <p>37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned. No mention of flood mitigation for properties south and north of railway line (Lucks and Wagon Lanes, Queen Street).</p> <p>Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned.</p>	<p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1.</p>
106-4	Jude Singleton				5 Transport related matters		<p>Traffic concerns:</p> <p>A21 Matfield junction and Colts Hill already at peak capacity.</p> <p>Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse.</p> <p>Suggested solutions:</p> <p>Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road)</p> <p>Dualling of A228 to Hop Farm roundabout.</p> <p>Block up Lucks and Wagon Lane and their railway bridges and use speed reduction measures.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.</p>
107-2	Juliet Andrew				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		<p>General concern in regard to the proposed strategy and meeting housing needs on green spaces and best and most versatile agricultural land as well as orchards. Should consider brownfield sites first and also concern about development in areas of flood risk and impact on existing properties.</p> <p>Strategy should be looked at again and consider - brownfield sites and distribution across the borough rather than in one area that has insufficient infrastructure and is prone to flooding.</p>	<p>Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83.</p> <p>The council Strategic Housing and Economic Land Assessment (SHELAA) review the sites in the SLP for appropriateness. Further work has been undertaken on Green Belt sites, and this in the High Weald national landscape in the evidence base.</p>
107-3	Juliet Andrew				5 Transport related matters		Number of comments on Policy STR/SS 1;	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>local roads not able to cope with local traffic and maintenance.</p> <p>Railway bridges not fit for purpose</p> <p>insufficient parking for new housing in Paddock Wood or within the town centre.</p> <p>Pollution and inconvenience to existing residents</p>	<p>outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed.</p> <p>Sites coming forward through the planning process will be considered against parking standards which are set out in policy TP 3, and to ensure that they are constructed and design in a sustainable way to minimise pollution during construction and after (policy EN 1).</p>
107-4	Juliet Andrew				6 Infrastructure		<p>Concerned over lack of infrastructure in particular health and increased crime since new housing developed. Also concern over preserved trees being removed as part of the Church Farm development.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1.</p> <p>The SLP includes suite of policies to protect, amongst other things, hedgerows, trees and wildlife (EN1, EN9, EN10).</p>
108-1	Karen and Steve Dewhurst				6 Infrastructure		<p>Concern over further development at Paddock Wood in particular with regard to infrastructure including;</p> <p>Health - doctors and dentists</p> <p>Education.</p> <p>Drainage and water supply.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1.</p>
108-2	Karen and Steve Dewhurst				Other Matters		<p>Concern over increased anti-social behaviour as a result of new development and Paddock Wood no longer having a police station.</p> <p>Also, the increased house building is changing the feel of Paddock Wood and question the need for the new housing being proposed.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1.</p> <p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p>
109-1	Karen Higgins				6 Infrastructure		<p>Object to Policy STR/SS 1 on the following grounds;</p> <p>Building 50% of the borough's housing need in Paddock Wood</p> <p>Lack of infrastructure to support proposals - particularly health, utility, road, drainage, sports and education.</p> <p>If houses are to be built then infrastructure needs to be provided at same time or before development takes place</p>	<p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p> <p>Proportionate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046)</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
109-2	Karen Higgins				5 Transport related matters		Existing roads and infrastructure are below standard and not clear how improvements will be made. Also concerns regarding the train station and parking.	Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS_047 , PS_048 , and PS_049) has been published as part of the stage of the examination.
109-3	Karen Higgins				4.7 Sports and Leisure provision		Already lack of sports and leisure facilities in Paddock Wood and concern that the swimming pool is no longer included in the plans.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).
109-4	Karen Higgins				4.4 Flood risk and Housing		Concern with regard to flooding including the following; within Paddock Wood but also consequential impacts elsewhere. New sewage works at Lucks Lane will make problem worse what consultation has taken place with Tonbridge and Malling BC who are impacted by this More detail required to explain how flooding will be managed and avoid making problem worse	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1. Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land. Tonbridge and Malling Borough Council have been consulted on the proposed revised strategy.
109-5	Karen Higgins				Other Matters		Concern that there has been little engagement with Paddock Wood Town Council on the proposals and regard to the Neighbourhood Plan.	The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan, and has been engaging with them over the proposed changes to the development strategy as set out in policy STR.SS 1

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
109-6	Karen Higgins				4 Paddock Wood strategic growth		Local Plan is not acceptable in its current form.	The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan, and has been engaging with them over the proposed changes to the development strategy as set out in policy STR.SS 1
110-1	Karen and Michael Lloyd				Other Matters		The Local Plan has no regard to Paddock Wood Town Council or the Neighbourhood Plan. Increase in anti-social behaviour with new residents moving in and lack of police station or police presence.	
110-2	Karen and Michael Lloyd				6 Infrastructure		Concern that the town centre is not being improved to support the number of new homes being built. Also in regard to infrastructure provision; Water supply Health - doctors surgery currently at capacity Cemetery space	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
110-3	Karen and Michael Lloyd				5 Transport related matters		Consider that extensive road improvements will be required to support the new development as well as new and improved bus services.	Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS 047 , PS 048 , and PS 049) has been published as part of the stage of the examination, and includes a modal shift strategy including a Bus Feasibility Study (PS 058).
110-4	Karen and Michael Lloyd				4.7 Sports and Leisure provision		Review of sports provision is welcomed but concern that the Elm Tree football ground has not been considered. Consider that the Putlands Sports Centre should be improved.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS 054).
111-2	Francesca Potter	Kent County Council			4.6 Education infrastructure provision		PS046 Paddock Wood Strategic Sites Master Planning and Infrastructure Study - Paddock Wood Growth Follow-on-study KCC make the following comments KCC welcome the safeguarding of land in NW Paddock Wood for future 6FE secondary school need but clarification is needed as to whether the 7.6 ha site is to accommodate a 6th form. KCC also request that the land provided is in good condition, level and has good transport links to promote sustainability and welcomes the narrative that proposes Option 2.	The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.

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							<p>KCC raises concerns about the reference to the school being on a 'split site' with buildings on one side of a watercourse and playing fields on the other side. A split site is rarely supported by either KCC or an academy trust as it raises a number of issues.</p> <p>Concern over references in the infrastructure Schedule Table 8 which refers to 4FE Contribution towards new secondary school (on-site) however does not appear to be consistent with 2.21 where KCC confirm the need for a 3 FE.</p> <p>Also no mention of waste infrastructure requirements - there is an ongoing need to seek contributions to fund a Waste Transfer Station and Household Waste Recycling Centre facilities upgrades and renewals, principally and currently at the North Farm Depot.</p> <p>Also no reference to requirement for ongoing funding support through S106 for libraries, community learning and skills and integrated children's services. Also need to clarify reference to Primary Care contribution which is vague.</p> <p>PS_054 Local Plan Development Strategy Topic Paper - Addendum - TWBC January 2024</p> <p>Education - the removal of Tudeley Garden Village has reduced the forecast demand for secondary school places but also the site previously proposed is no longer available. Two options available and concerns raised with each - new site at PW- possible flood risk and careful design and flood mitigation required and land needs to be transferred to KCC at nil cost.</p> <p>Expansion of Mascalls Academy by 3FE - would make it one of the largest secondary schools in the County with additional challenges both operationally, physically and educationally. The Academy Trust will need to ensure that it is feasible in collaboration with KCC.</p> <p>Additional capacity at existing secondary schools - outside of the borough at T&M - unlikely to be favourable or achievable - KCC agrees with this conclusion - so either a new school or expansion of Mascalls will be required.</p> <p>PS_063 - Summary of Proposed Modifications to the Development Strategy following Inspectors Findings in November 2022</p> <p>SLP Mod 9 - STR/SS1 The Strategy for Paddock Wood, including land at east Capel - Education - KCC's preference is for the development of a 4FE secondary school to accommodate the 3FE uplift in school places with the opportunity to expand from 4FE to 6FE.</p> <p>Policy SS/STR(1A) - North Western Parcel Requirements - KCC is supportive of a 3 form entry primary school,</p>	<p>Site specific allocations and supplementary planning document will provide additional policy detail regarding the delivery for the secondary school, its access to sustainable transport in addition to the revised policy wording in STR/SS 1.</p> <p>An option for a new build school has been safeguarded as part of STR/SS 1 in the northwest so that their playing fields form an extension of the green infrastructure network. Secondary school playing fields have been placed in Flood Zone 2 areas, but not as a split site.</p> <p>Developer contributions towards to construction of a 3FE school will be necessary, however if a new build school is required owing to the feasibility of expanding Mascalls Academy not being acceptable then a 4FE school will be required.</p> <p>Revised policy STR/SS 1 states under Strategic Infrastructure criterion e)The delivery of necessary infrastructure shall be informed by ongoing discussions with relevant stakeholders, including Kent County Council and adjacent local authorities (Tonbridge & Malling and Maidstone Borough Councils) and other relevant statutory consultees and be kept under review throughout the planning stages of the development.</p> <p>Points from KCC Education supporting strategy for secondary school provision as set out in the DSTPA noted.</p>

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							safeguarded to enable expansion to three form entry and the safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required. Policy SS/STR 1 (d) - North Eastern Parcel Requirements - KCC is supportive of the reference for land for a two-form entry primary school.	
113-3	Alan Chilvers	Residents of Golden Green Association & Keep Kent Green			4.8 Overview and Conclusions		<p>Paddock Wood - unsound as the proposed revisions to the Local Plan are not positively prepared, justified, effective, nor consistent with the NPPF.</p> <p>TWBC have focussed on the matters raised by the Inspector, rather than re-examining alternative sites, strategies and policies. Existing sites have been shoehorned in, with nearly 50% of the housing supply delivered through STR/SS1. Why can't the housing requirement be more balanced and evenly distributed across the borough, rather than large developments at the Borough's borders?</p> <p>The proposed strategy should not be considered a 'box ticking exercise' without the required evidence relating to: infrastructure, further viability details, sewage provisions, flood risk and the partial removal of a natural floodplain, Green Belt, education, distribution of housing allocations and need.</p>	<p>The Inspectors Initial Findings letter raises a number of issues specifically that required consideration. The Council has undertaken this work as set out in the consultation documents that have been published.</p> <p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PS_054). The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>Undertaking further Call for Sites, and their review will undertaken as part of the Council's commitment to an early review of the plan.</p>
113-4	Alan Chilvers	Residents of Golden Green Association & Keep Kent.Green			6 Infrastructure		<p>Infrastructure - unsound</p> <p>Limited proposals which address concerns relating to improving roads, rail, buses, doctors and medical facilities, dentists, retail provision and leisure facilities. Further, up-to-date viability details are necessary to evaluate deliverability of the proposed infrastructure. An updated IDP has not been provided which makes assessing the funding and delivery of infrastructure difficult. It appears the consultants just increased the costing estimates from the 2021 IDP by 15%. Confirmation of sufficient sewerage provisions will be in place prior to any new development is needed along with assurances that incidents from recent capacity constraints have been addressed.</p> <p>The Infrastructure Plan highlights the potential Colts Hill Bypass with a cost of £5.8 million, however, within the previous 'LDP' the Bypass was classified as critical with a cost of £30 million to be funded by developers. Further detail and clarification of the cost is required.</p> <p>Why is the ongoing working report with Dixon Searle, referenced in para 6.9, not included in the consultation? The DLA paper lacks clarity and detail. TWBC have had</p>	<p>Infrastructure provision has been included in the revised STR/SS 1. This is based on a reduction in the number of houses allocated within the plan at Tudeley Garden Village (STR/SS 3) and Paddock Wood and land at east Capel (STR/SS 1).</p> <p>The Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS_061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix II Table 2 compared with the previous equivalent results table' and that there is no change to viability overall. £7.25M has been factored into the Colts Hill bypass and includes funds already secured through KCC Highways for development that has been progressed at Paddock Wood.</p>

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							two years to provide further information and clarify the concerns raised at Reg 18 and 19. Accurate viability figures are essential for the Paddock Wood/East Capel developments as there are many factors to consider. It is concerning the finer details remain missing.	
113-5	Alan Chilvers	Residents of Golden Green Association & Keep Kent.Green			4.4 Flood risk and Housing		<p>Paddock Wood flood risk - unsound There is a lack of evidence on flood risk betterment. Despite well documented flooding concerns highlighted through previous consultations and the examination, Paddock Wood and East Capel continues to be pursued as a major contributor to the growth strategy. Evidence to support a flood risk strategy which aligns with the NPPF has not been provided and the concerns have not been addressed.</p> <p>Flood betterment has been promised by TWBC on the three strategic sites under construction, however, the sewage system has been further burdened and regularly overflows. Surface water flooding issues have increased significantly.</p> <p>The floodplain which is proposed to be developed on provides protection to many settlements outside of the borough. Cross borough collaboration is required to provide these communities assurances the proposals will not negatively affect them.</p> <p>Within the 'original LDP' £9 million was allocated in the viability study to provide preventative flood mitigation. The revised viability study assumes a lower figure of £8.6 million. The 'revised LDP' still assumes sizeable development in an area with a long history of flooding. How will the risk be eliminated from the planned development sites?</p>	Further evidence has been provided as part of the consultation on Flood Risk including PS_042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS_043 Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS_044 Updated present day and climate change Flood Zone mapping all of which comply with the NPPF. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. The STR/SS 1 site has been re-masterplanned and reduced in scale so that housing is planned for FZ1 only, with the proposed policy revised to ensure deliverability including 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
113-6	Alan Chilvers	Residents of Golden Green Association & Keep Kent.Green			Summary of findings (Green Belt)		<p>Green Belt - unsound Further evidence required to justify the exceptional circumstances for the removal of 148ha of productive, agricultural Green Belt land. TWBC has not approached the Inspector's points with an open mind and has sought to keep its original development strategy intact as much as possible.</p> <p>The cumulative harm of Green Belt release has not been addressed.</p> <p>There are many reasonable alternative that have the same or lower harm ratings than STR/SS1, which have not been proposed for allocation with no clear reason. Confusingly, TWBC mentions the change in development strategy may lead to some sites rejected for Green Belt contribution may be reconsidered as part of a Local Plan review. These sites should have been reviewed in the last two years to demonstrate all options were explored before deciding on removing large areas of the Green Belt.</p> <p>A document from Save Capel at Reg 19 details alternative sites with lower harm ratings and brownfield sites. Some</p>	A Green Belt Study 3 Addendum report (PS_035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD_3.77 and PS_036) has indicated that all available sites have been utilised in the plan. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83

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							commentary on why these were not considered would be useful.	
113-7	Alan Chilvers	Residents of Golden Green Association & Keep Kent.Green			4.6 Education infrastructure provision		<p>Paddock Wood education provision- unsound More detail is required on education provision. Confirmation is required on whether the Mascall's expansion is viable, how it is funded, and if it has support from the academy and KCC. Further information should also be provided to confirm the identified site for an alternative primary and secondary education facility will be funded, will receive the required accreditation, and on deliverability and approval by the educational authority. The respondent asks whether the alternative educational provision has undergone a flood sequential test and how cycling from East Capel to Paddock Wood would work.</p>	<p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.</p> <p>Site specific allocations and supplementary planning document will provide additional policy detail regarding the delivery for the secondary school, its access to sustainable transport in addition to the revised policy wording in STR/SS 1.</p> <p>An option for a new build school has been safeguarded as part of STR/SS 1 in the northwest so that their playing fields form an extension of the green infrastructure network. Secondary school playing fields have been placed in Flood Zone 2 areas, but not as a split site.</p> <p>Developer contributions towards to construction of a 3FE school will be necessary, however if a new build school is required owing to the feasibility of expanding Mascalls Academy not being acceptable then a 4FE school will be required.</p>
113-8	Alan Chilvers	Residents of Golden Green Association & Keep Kent.Green			5 Transport related matters		<p>Paddock Wood transport - unsound The work on modal shift and sustainable transport fails to consider the lack of employment in Paddock Wood. Workers are likely to continue relying on motor vehicles, questioning the overall sustainability policy. Air pollution in Paddock Wood is high during rush hour. There is no reference in addressing this. The DLA masterplanning work is not clear on what is meant by short, medium or long term nor the associated funding costs and trigger points for the proposed improvements. The proposed one way system relating to the railway bridge lacks evidence that it will improve the current congestion.</p>	<p>The review of transport modelling has been undertaken by consultants (PS_047, PS_048, and PS_049) which includes modal shift Impact reporting on the bases of the revised growth at Paddock Wood and land at east Capel.</p> <p>The councils 2019 AQ monitoring results show that the annual mean of NO2 measured from the diffusion tubes (located in Paddock Wood) are below the annual mean objective of 40ug/m3. Policy EN21 of the SLP deals with Air Quality that would be considered on a case by case scenario at the Development Management stage.</p>

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114-1	Keith Hopkins				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		Concern about the design of the new houses being built at Paddock Wood and the Tunbridge Wells area.	The design of dwellings themselves will be considered at application stage through the Development Management process. Revised policy STR/SS1 sets out design principles of which No.5 states that development 'be of a high standard of design with particular attention to be paid to structural and detailed landscaping (to promote and deliver a continuous and homogeneous landscape approach to the allocation as a whole), layout, scale, height, detailed design, and massing to ensure that the development responds to local character and its overall setting. Planning applications for development should be informed by a landscape and visual impact assessment, biodiversity and heritage studies and the initial outline/ hybrid applications should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application.'
114-2	Keith Hopkins				6 Infrastructure		Concern that South East Water does not have the capacity to supply to the existing houses in Paddock Wood and so question their capacity for supplying to any new houses.	South East water have been consulted through the preparation of the Local Plan. In the published Consultation Statement () section 6.1.26 states that in regard to policy EN26 Water Quality, Supply and Treatment (now combined with DLP Policy EN 27: Conservation of Water Resources to form Policy EN 24: Water Supply, Quality and Conservation in the Pre-Submission Plan) that South East Water, strongly supported the policy. Given that the growth for housing has been radically reduced as part of the Councils response to the Initial Findings it is not anticipated that the capacity for supply would be compromised. SE Water have been consulted on the proposed changes.
115-1	Keith Sinclair				4.4 Flood risk and Housing		Number of concerns with regard to flood risk, including; Construction in flood zones 2 and 3 without appropriate mitigation. Existing arrangements for sewage and rainwater outfall and treatment is already at capacity and major works required to cope with any new development. Impact of climate change needs to be taken into account.	Further evidence has been provided as part of the consultation on Flood Risk including PS_042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS_043 Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS_044 Updated present day and climate change Flood Zone mapping all of which comply with the NPPF. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of

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								approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. The STR/SS 1 site has been re-masterplanned and reduced in scale so that housing is planned for FZ1 only, with the proposed policy revised to ensure deliverability including 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
115-2	Keith Sinclair				6 Infrastructure		<p>Number of concerns over provision of infrastructure including;</p> <p>Health Education Roads</p> <p>Also impact on building in flood zone areas and any infrastructure must be provided upfront before development takes place.</p>	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046)
117-1	Mr and Mrs Whetstone		Kember Loudon Williams	Kember Loudon Williams	4 Paddock Wood strategic growth	<p>Given the above, and to make the Borough Local Plan sound in our view, we would therefore suggest the following modification to the proposed policy, to be inserted before or after paragraph 15 of the "Development principles" section of the revised proposed wording of the policy –</p> <p>"Where the delivery of the development involves more than one landowner, land equalisation agreements will be required to be put in place. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach."</p>	<p>Paddock Wood - unsound</p> <p>Respondent has an interest in Tudeley Brook Farm (SHELAA site DPC19) to the north of Paddock Wood, directly south of Whetstead Road (A228). The land is included under the North-Western Parcel (A) in Revised Map 27 Masterplan Areas. The land has been designated within a Green and Blue Strategic Landscape Corridor, with overarching visual/physical amenity, ecological, landscape, movement and connection benefits to manage flooding and the well-being of the new communities.</p> <p>Whilst commendable, the green and blue infrastructure designation raises a requirement to facilitate land equalisation agreements for the benefit of the landowners required to 'give over' their land for the future benefit of the wider community. The merit and benefit the Site brings should be acknowledged and property accounted for in the Local Plan.</p> <p>The correct 'ownership blind' approach to masterplanning resulted in the Site being positively included within the wider strategic allocation of Paddock Wood in the North-Western Parcel (A). The Site's continued allocation is welcomed but concerns remain on the commitment to support the Site and facilitate its wider integration. It is essential that TWBC commits fully to the entire masterplan vision, including the Site at Tudeley Brook Farm, to ensure the full benefits of the masterplan are realised. The continued reliance upon the delivery of the masterplan through a SPD is not sufficient.</p>	<p>Whilst the nature of SPD production relies on public consultation, it would already benefit from a policy direction that has already been agreed through the Local Plan. Swift delivery of SPDs is not uncommon and can be twin-tracked with later consultation on main modifications. Nevertheless, it has been accepted at the hearings that the policy itself (STR/SS1) may be modified (Appendix D) to only require a single overarching SPD, which would include the parameters for the scale, type and mix of uses permitted at each of the development parcels (aligned with each developer), and also identify strategic and site-specific infrastructure. Policy STR/SS 1 has been amended to consider how this might be brought forward. The redline site boundary of the allocation at STR/SS 1 in the NW parcel remains unchanged.</p> <p>The revised wording of STR/SS 1 includes - 13. The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be guided by the Council's Structure Plan SPD for the whole of the allocation; 14. Proposals for the piecemeal development of individual sites in the Eastern and Western Parcels that do not conform to the above requirements as a whole will not be permitted; and 15. The development to be delivered to be</p>

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						<p>This wording reintroduces the concept of equalisation agreements, as set out in the Submission Local Plan, and strengthens this by requiring equalisation agreements to be put in place.</p>	<p>TWBC's objectives for a collaborative landowner approach is reinforced in the Strategic Sites Topic Paper for Pre-Submission Local Plan (March 2021). Paragraph 3.5 states that site promoters were advised that they may need to "prepare for the potential use of equalisation agreements in order to achieve [the] ambitious, but reasonable, objectives sought". Chapter 7 is concerned with deliverability and viability but reference is only made to the key site promoters. Regrettably, TWBC have focussed their attention on the four principal housebuilders whilst failing to acknowledge there are other important areas of land. This needs to be addressed in order for the plan to become effective and sound.</p> <p>The revised wording of Policy STR/SS1 has removed the reference to required land equalisation agreements. Without the necessary controls to ensure the comprehensive delivery of the whole masterplan vision, the policy is not effective, and therefore, unsound.</p> <p>Furthermore, the Strategic Sites Masterplanning and Infrastructure Study (February 2021) produced by DLA, highlighted "instances may arise where one developer is meeting the full cost of infrastructure shared by all, or one is disproportionately contributing in a different way such as by providing land", and concluding "Developers should be invited to form their own collaboration agreement or alternative mechanism for the equal sharing of costs. Should this not occur, TWBC should facilitate this process".</p> <p>TWBC's advisors have therefore recommended that TWBC must 'step in' if it is clear that an equalisation agreement is unachievable. It is therefore important that this land equalisation agreement is enshrined into the policy wording for clarity and to avoid unnecessary delays in the delivery of the masterplan.</p> <p>As the planning authority, TWBC must take charge of this process in the public interest and absent of private agreements between the affected stakeholders. Repeated approaches have been made to Crest Nicholson to explore collaborative working possibilities. Regrettably, these have been rejected and at present there is no collaboration or agreement between landowners. Without TWBC's support, there are concerns that the land will be marginalised to the detriment of its acknowledged importance to the overall vision.</p> <p>To make the plan sound, the following wording should be inserted before or after paragraph 15 of the "Development Principles" section of the revised proposed wording of the policy:</p>	<p>in accordance with a Framework Masterplan Page 73 of 87 Tunbridge Wells Borough Council Local Plan Development Strategy Topic Paper – Addendum Date of publication – January 2024 Revision: 4 Supplementary Planning Document (SPD) which will ensure reference is made to necessary equalisation of strategic infrastructure is delivered across the strategic development site.</p> <p>As and when development gains planning permission it is anticipated a Paddock Wood and land at east Capel Delivery Board will be established in order to monitor and co-ordinate the delivery of infrastructure across the strategic site. This will include the developers and respective stakeholders and be a requisite of the SPD and respective legal agreements associated with development.</p>

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							<p>“Where the delivery of the development involves more than one landowner, land equalisation agreements will be required to be put in place. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach.”</p>	
118-1	Kerry Clarke				4 Paddock Wood strategic growth		<p>Deeply concerned with the 'never ending development' in Paddock Wood.</p> <p>Crime and anti-social behaviour is already on the rise. Concerned this will not be addressed with the additional housing and will lead to further crime and anti-social behaviour.</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position regarding the delivery of Strategic Sites within the Development Strategy Topic Paper Addendum (PS 054). The Inspector comments at para 52 in his Initial Findings letter (November 2022)...”<i>that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth</i>”.</p> <p>The Strategic development parcels are being masterplanned and will be of a high level of design. This includes creating safer streets/neighbourhoods (incorporating secure by design principles) and fully integrating the developments within the local community.</p> <p>The necessary infrastructure in terms of education, highways and connectivity, health, sports etc will be delivered to support the growth proposed, and further contributions to community projects could also be secured.</p>
118-2	Kerry Clarke				4.4 Flood risk and Housing		<p>Questions why Paddock Wood is being allocated 50% of the borough's planned housing. The village has already been 'taken away' and a lot of greenery has already been lost.</p> <p>Concerned that services and infrastructure are at capacity and will not be able to cater to the increased population. Specifically, the doctors, chemist, dentists, sports facilities, primary and secondary school.</p> <p>The plans do not sufficiently address the flooding issues. Paddock Wood FC matches are constantly called off due to flooding, yet more houses will mean more children wanting to join the club.</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position regarding the delivery of Strategic Sites within the Development Strategy Topic Paper Addendum (PS 054). The Inspector comments at para 52 in his Initial Findings letter (November 2022)...”<i>that Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth</i>”.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1</p>

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								<p>following on from work with Masterplanning Consultant</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it (DLA) (PS 046) in terms of education, highways and connectivity, health, Sports and leisure etc with the latter to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool) as set out in the DSTPA (PS 054). The infrastructure would be funded by and equalised across the strategic development sites. Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p> <p>The updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p>
119-1	Kirsty Hesmer				6 Infrastructure		<p>Concerns over Paddock Wood's infrastructures:</p> <p>Lack of amenities and existing overwhelmed infrastructures from doctor surgeries to schools. Poorly-maintained Putlands sports centre, underutilised running track taking place of football/rugby pitches, lack of sports facilities</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046), this includes provision for sports facilities.</p>
119-2	Kirsty Hesmer				4.4 Flood risk and Housing		<p>Demand serious scrutiny to developments with regards to flooding.</p>	<p>Further evidence has been provided as part of the consultation on Flood Risk including PS 042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS 043 Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS 044 Updated present day and climate change Flood Zone mapping all of which comply with the NPPF.</p>
120-1	Lesley Wakeling				4 Paddock Wood strategic growth		<p>Concerns raised regarding PW's situations when reading in conjunction with the PW NDP's Visions and Objectives:</p> <ul style="list-style-type: none"> • Unsympathetic to heritage development (both existing/new) • Incommensurate and delayed essential infrastructure delivery: health, education, leisure provisions, public transport/adequate roads/parking, flood control measures 	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046). The revised policy sets out the development principles which align with the NPD which in itself makes reference to the proposed new development.</p>

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							<ul style="list-style-type: none"> The need to drive and inadequate close-by amenities supporting active travel and well-being (e.g. walk in the countryside), harming accessibility Poorly-maintained public spaces 	
120-2	Lesley Wakeling				4.4 Flood risk and Housing		Concern over the use of outdated Flood Zone map for decision making.	Further evidence has been provided as part of the consultation on Flood Risk including PS_042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS_043 Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS_044 Updated present day and climate change Flood Zone mapping all of which comply with the NPPF.
122-1	Lisa Gower				4 Paddock Wood strategic growth		Concerns over: <ul style="list-style-type: none"> Inadequate Infrastructure, e.g. health provisions Worsening the existing horrid security, crime, antisocial behaviours 	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046).
124-1	Lyn Kent				4.4 Flood risk and Housing		Object to the Local Plan with regard to Paddock Wood (PW) due to the lack of masterplanning for flood risk: Lack of source-control measures proposed - e.g. attenuation lakes - from Matfield/Brenchley/Pembury where upstream water cascade down through Tudeley Brook to Graveley Stream then railway culvert in PW	Further evidence has been provided as part of the consultation on Flood Risk including PS_042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS_043 Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS_044 Updated present day and climate change Flood Zone mapping all of which comply with the NPPF.
125-1	Lynn Ashton				4 Paddock Wood strategic growth		Object to new housing development owing to: Poor infrastructure in terms of transport, healthcare, education provisions, flooding Current vandalism on the rise	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046).
127-1	Mark Munday				Other Matters		Concerns over PW NDP is ignored largely and pace/scale of development overrun the infrastructure improvements. Lack of regards to social implications and how to invest equally into both new sites/current town. Held-up S106 monies/projects due to stagnate Local Plan progress, raising concerns over provisions of facilities/infrastructure.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046). The revised policy sets out the development principles which align with the NPD which in itself makes reference to the proposed new development. TWBC has dedicated S106 monitoring in place that seeks to award infrastructure funding that has been collected as and when infrastructure comes forward. The timeline for this is set out in the IDP
127-2	Mark Munday				4.4 Flood risk and Housing		Concern over building on every part of Flood Zone 1 without addressing social value, while not adding new flood control measures for existing housing in Flood Zone 2 and 3.	The response to the Inspectors Initial Findings re-evaluates flood risk in a series of additional reports PS_042 River Medway and River Teise updated climate change Flood Zone modelling and mapping, PS_043 Paddock

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								Wood Streams updated present day and climate change Flood Zone modelling and mapping, and PS_044 Updated present day and climate change Flood Zone mapping. Flood control measures would be designed in to any development that would come forward into FZ2.
127-3	Mark Munday				5 Transport related matters		<p>Road Network</p> <ul style="list-style-type: none"> • Three new junctions onto the A228 risk being the rat-runs through new housing development by Maidstone Road as the ‘dampers corner’ roundabout by Colts Hill/Five Oak Green is on permanent hold. • Railway Bridge: ‘Shuttle signal Bridge’ might provide access for cyclists/pedestrians but risk causing congestion and pollution, or overburdening existing dampers corner roundabout. The plan also overlooks the likely benefit in enabling traffic from north into Station Road/Waitrose • Commercial Road: proposed to be one way/or pedestrianised and improve Station Road for two-way traffic • Badsell Road: junction improvement on-hold while three existing developments already in place and Mascalls School extension proposed <p>Active Travel</p> <ul style="list-style-type: none"> • Lack of integration into existing town <p>Public transport</p> <ul style="list-style-type: none"> • Suspect the deliverability of PW circular bus route • Propose for: <ul style="list-style-type: none"> ○ better bus services between Tonbridge/Tunbridge Wells (TW)/Maidstone ○ direct train from TW to Maidstone via Tonbridge/PW without changing at Tonbridge to ease A228/Pembury Road traffic 	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047 , PS_048 , and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a ‘monitor and manage’ where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.
127-4	Mark Munday				4 Paddock Wood strategic growth		Overlook the Town Centre's crucial roles and needs for improvement, where at minimum a business improvement plan is required to revitalise new mixed businesses, and a Supplementary Planning Document might come in later.	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046)
127-5	Mark Munday				4.6 Education infrastructure provision		Proposed to have education provisions shared by the new school by Eastlands and not just focusing on the Mascalls extension. Concerns over delay in the opening of the new primary schools: one on Green Lane/Drumbrell Drive, and another	Changes in residential capacity of the site have required a revisiting of the need for new schools, both primary and secondary. Primary education provision requirements has been confirmed as a maximum need of 4FE, split between 2x 2FE schools. Primary School

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							by Church Road/Elm Tree/Mile Oak, hence suspect deliverability of the primary school at Eastlands.	provision has been discussed with KCC as Education Authority, and the revised masterplanning document identifies where the primary school provision will be required.
127-6	Mark Munday				4.7 Sports and Leisure provision		Lack of communication with PWTC and the existing sports clubs for Sports Hub/Site Allocation, and disregard PW NDP where a sports hub to be north of the railway at Eastlands not down south as in the Local Plan: raising concerns about viability and national/local guideline compliance.	The council has engaged with PWTC through the stages of the process to review the growth at Paddock Wood and land east of Capel. Given the reduction in overall growth in the plan a reduction in Sport and Leisure facilities has been necessary. The Council has looked to split sports growth across three sites, which includes improvements to Putlands Leisure centre and associated facilities and provides 4.5ha of land for further pitch provision car parking and pavilion. The Paddock Wood Growth Follow-on Study (PS 046) sets these details out.
127-7	Mark Munday				6 Infrastructure		Healthcare provision plan lacks regards to new facilities and only vaguely implies improvements on existing ones where many of them have reached full capacity. Proposed to include health services within sports centre for routine needs and prevention than cure.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046).
127-8	Mark Munday				4.5 Employment land - review of options		Employment plan induces only lower wage jobs related to warehousing/freight sites - not a desired mixed profession environment - posing pressure on A21, A228 roads for commuting.	Employment land provision at Paddock Wood (PS 045) sets out the employment provision for revised policy ST/SS 1.
129-1	Gwyneth Michele Sinclair				Other Matters		Plan legally non-compliant and unsound due to lack of reference to the Paddock Wood Neighbourhood Plan in the Council's response.	The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).
129-2	Gwyneth Michele Sinclair				4.6 Education infrastructure provision		Plan legally non-compliant and unsound - due to concern over; Building new primary and secondary schools on land which borders and abuts Flood Zone 2 - Playing Fields will be waterlogged for much of the year. no explanation why 2 schools being built north of the railway line when residential properties to the south and south-west. take no account of the fact that the buildings at Mascalls school can be expanded why the Primary school in Green Lane has been removed	The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work. A Primary School was never proposed at Green Lane as part of the SLP
129-3	Gwyneth Michele Sinclair				5 Transport related matters		Plan legally non-compliant and unsound - due to; without upgrading and improving the B2160, impact of traffic along the B2160 will be worse. No clarity on issues and solutions from impact of the proposals.	Further transport related work has been undertaken as part of the council's response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047 , PS 048 , and PS 049) where the road network as a whole has been re-

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								assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.
129-4	Gwyneth Michele Sinclair				6 Infrastructure		Plan legally non-compliant and unsound - due to Although there is a list of infrastructure to be provided, it does not specify when and who will fund the projects. Particular concern with regard to health, traffic and sewage infrastructure	The revised policy STR/SS 1 sets out the necessary infrastructure and whether is necessary as part of the strategic growth or necessary for each of the individual parcels. The Infrastructure Delivery Plan will be revised as part of the Main Modifications process.
130-1	Michael Perry				4 Paddock Wood strategic growth	The proposed building on the green belt in East Capel should be removed, as it is not compliant with the principals of green belt legislation.	Concern that the plan does not take into account the impact of development on the Green Belt to the east of Capel and little has been done to provide land that is not within the Green Belt. Proposed building on Green Belt Land at East Capel should be removed as it is not compliant with Green Belt policy.	A number of green belt studies have been undertaken as art of the evidence base to support the initial identification of Paddock Wood and land at east Capel for strategic growth (CD 3.93, and 3.141 - see the Core Document List).
130-2	Michael Perry				4.4 Flood risk and Housing	The proposed building on the green belt in East Capel should be removed, as it would create significant flood risk to both proposed and existing properties.	Plan legally non-compliant and unsound in regard to: Although further flood risk assessment has been undertaken, doubt over its accuracy of predictions due to climate change and impact of building on land that is not currently at risk. Proposed building on Green belt land in East Capel should be removed due to significant flood risk to both proposed and existing properties.	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
131-1	Mr D and Mrs Angela Boobbyer				4.4 Flood risk and Housing		Flooding: 12.10 and 12.11 - Rhoden Stream runs through our garden, struggling to cope with increased water level from existing recent developments - land regularly floods Developers planning to deposit 50,000 litres a day minimum into this small stream. There will also be extra run-off water form the new development. No mention of expected 37% increase in rainfall from impact of climate change As noted in 12.11 Rhoden Stream can only take so much water and there has been no upgrade of the stream, culverts and ditches. Increasing level of water going into this Stream is completely unrealistic without causing significant flooding to surrounding properties, area and roads	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
131-2	Mr D and Mrs Angela Boobbyer				6 Infrastructure		Town centre is not part of Paddock Wood Structure Plan - present facilities are expected to cope with the additional demands e.g. Local GPs are already fully utilised New development will exacerbate existing flood risks, create additional demand on limited resources and more traffic on roads not designed to cope with it	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all

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								housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
134-3		National Highways (formerly Highways England)			4 Paddock Wood strategic growth		<p>National Highways consider that proposed changes to the Local Plan are not sound in regard to Policy STR/SS1 in relation to the following;</p> <ul style="list-style-type: none"> • The proposed revision to STR/SS1 is supported by a significant amount of additional transport work and the majority has been the subject of previous discussions with NH. In particular, PS-047, PS-048 and PS-059 present the evolution of most of the recent highway capacity modelling analysis and address a large number of issues. <ul style="list-style-type: none"> ○ However, further technical work is required and the outstanding matters are set out in NH's technical note to TWBC. NH continue to engage constructively with TWBC on addressing the outstanding matters that relate to the SRN, in particular the A21 Kippings Cross, Flimwell and A228 (Dumbell) junctions. ○ NH acknowledge that a considerable volume of work has been carried out and NH has already commented on a number of documents. ○ While in principle, the proposed amendments to the strategy appear acceptable, NH are awaiting completion of requested actions to demonstrate the effectiveness of the proposed measures on SRN trips and as such NH's conclusions are not finalised at this stage. ○ NH have not previously seen the document PS_060, which brings all the information together but does not address the outstanding detailed questions from previous consultations with TWBC. However, engagement with TWBC is constructive and ongoing, although at present, the proposed change does not sufficiently meet the requirements of the 'justified' and 'effective' tests due to outstanding matters, particularly in relation to 'monitor and manage'. ○ NH make a number of comments in their 'National Highways Technical Note on Transport Evidence contained in Appendix A, including; <ul style="list-style-type: none"> ▪ comments on the Tunbridge Wells Borough Council Local Plan - Local Junction Capacity Sensitivity Testing Technical Note 	Further technical work is being produced by TWBC consultants in order to resolved matters that have been raised by National Highways. TWBC is working positively with NH and KCC Highways on highways related matters.

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							<ul style="list-style-type: none"> ▪ Review of key strategic Model Outputs ▪ Overview of junction modelling ▪ Junctions 21 and 22: A21/A228 Pembury Road/Tesco ▪ Junction 31: A21 Kippings Cross ▪ Further comments on Proposed Mitigation Measures <ul style="list-style-type: none"> • NH conclude that the submitted technical note provides some further detail and explanation around the expected impacts of Local Plan traffic under the 'high modal shift' scenario. It is noted that actions remain outstanding, as well as concerns raised by KCC and that significant further work will be required to develop any 'in principle' mitigation schemes to a level where that are acceptable to National Highways as suitable mitigation for the Local Plan proposals. 	
135-1		Natural England			Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		<p>Policy STR/SS 1 - unsound: Reduction in scale of development noted. However, still concerns about impact on High Weald National Landscape (HWNL) and suggest amending and strengthening the policy wording in line with NPPF Para 182 (development within the setting of designated areas), to avoid/minimise impacts:</p> <p><i>'5. ...Planning applications for development should be landscape led informed by a landscape and visual impact assessment...'</i></p> <p><i>10. *Have regard to* Be delivered in accordance with the recommendations of the High Weald *AONB* National Landscape Setting Study and the objectives of the High Weald *AONB* National Landscape Management Plan, where *deemed* to they fall within the setting of the *AONB* National Landscape.'</i> [TWBC: text between **should be struck through]</p> <p><i>'15 iv Show all structural landscaping and indicative treatments to be provided (including boundary treatments) and how this integrates and complements the landscaping of neighbouring plots'</i></p> <p><i>'15 v Incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape assessments. The green and blue infrastructure plan should demonstrate how it integrates and complements the plan of neighbouring plots. This should incorporate... The GBI should be developed in accordance with the national Green Infrastructure Framework'</i></p> <p>Strategic infrastructure</p> <p><i>'d. Transport links and associated transport and highway improvements and the provision of new transport and highway infrastructure is provided when it is needed to support the development and mitigate potential off-site</i></p>	<p>The proposed development at Paddock Wood and land east of Capel is not in the High Weald National Landscape.</p> <p>Paragraph 230 of the NPPF (19.12.23) requires that local plans that reached examination before 19.03.24 will be examined under the relevant previous version of the Framework in accordance with the above arrangements.</p> <p>Policies in the SLP make reference to the need for development within, or affecting the setting of, the High Weald Area of Outstanding Natural Beauty (AONB) shall seek to conserve and enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan (policy EN19)</p>

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							<p>highway and other transport impacts. The location and design of any transport links will ensure that landscape and visual impacts to the High Weald National Landscape and its setting are avoided or fully mitigated.'</p> <p>Policy SS/STR 1(C) South Eastern Parcel Requirements 'viii *Shall demonstrate particular regard for the setting of the* Shall be sensitively designed to ensure that impacts to the High Weald National Landscape *AONB* are avoided or fully mitigated and should be in accordance with the High Weald National Landscape Management Plan and Setting Study.' [TWBC: text between **should be struck through]</p> <p>Policy SS/STR 1(D) – North Eastern Parcel Requirements 'ix. *Shall demonstrate particular regard for the setting of the* Shall be sensitively designed to ensure that impacts to the High Weald National Landscape* AONB* are avoided or fully mitigated and should be in accordance with the High Weald National Landscape Management Plan and Setting Study.' [TWBC: text between **should be struck through]</p>	
136-1		NHS Kent and Medway ICB			4 Paddock Wood strategic growth		NHS Kent and Medway ICB recognise the approach by TWBC to provide healthcare infrastructure for Paddock Wood thought the masterplan approach and will continue to liaise with the council to define and secure the requirements for the delivery of healthcare infrastructure.	Position noted.
137-1	Nicola Leeds				4 Paddock Wood strategic growth	<p>Whilst I support the removal of the Tudeley Garden Village from the draft plan, and also support the reduction in proposed housing in Paddock Wood including east Capel, significant changes are still required for the local plan to be fit for purpose. The Tudeley village should be removed completely as a possible site - as drafted the plan leaves future development as an option. Even in the limited cases where additional infrastructure for and around Paddock Wood has been</p>	<p>The Local Plan is Legally Non-compliant/Unsound due to:</p> <p>Lack of consultation with neighbouring LPA, PWTC</p> <p>Lack of consideration to the alternatives to PW's strategic growth.</p> <p>Lack of critical infrastructure to support PW's excessive expansion, particularly overlooking new surgeries required.</p> <p>Lack of consideration to the impact of flooding given current struggling sewage capacity.</p> <p>Support Tudeley Village removal and reduction in housing units with none on Flood Zone 2/3, adding Proposals as follows:</p> <p>Keep Tudeley completely intact without future consideration at all.</p> <p>Infrastructure BEFORE further development with more realistic costings with no stop-gap approach seen in failed-to-deliver sewerage projects</p> <p>Other concerns/objection raised over:</p> <p>Unjustified Green Belt's release at East Capel, and priority for brownfield.</p>	<p>The council has undertaken a thorough consultation including with neighbouring Local Planning Authorities and Paddock Wood Town Council.</p> <p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p> <p>Proportionate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046) which will be delivered as required.</p> <p>Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83</p> <p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and</p>

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						included - there are either unrealistic costings which will reduce the likelihood they will happen, or there is no clear approach to ensuring the necessary infrastructure or services improvements are in place BEFORE further development. Paddock Wood has already been subject to significant increase in housing without the infrastructure changes - for example just look at the stop gap approach to increasing sewerage facilities where we were promised a more future proofed project than was delivered,	Knock-on impact of existing housing on flooding, limited solution to a future-proof surface water issue Bypass of Colts Hill's impact on local wildlife, railway bridge to be one-way. Sporting facilities not commensurate with growth, suspect deliverability of the swimming pool though support it. Retail space and NDP are disregarded Unclear immediate review. Monitoring permission in prevention of bank land/speculative development.	PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations.
quired		Paddock Wood FC			4.7 Sports and Leisure provision		Concern that the outdoor sports hub is no longer proposed alongside the new housing. Paddock Wood is in need of bigger and better facilities including; a 3G pitch a second rugby pitch a number of various size football pitches and training areas a swimming pool benefits of having all of the facilities in one location with cafe/bar which would be welcomed by residents of Paddock Wood. Consider that better infrastructure needs to be provided alongside the housing growth, also including shops, doctors, dentists, schools, drainage and flooding infrastructure. Have been involved in previous discussions through the NDP and other meetings to improve the town and the supporting facilities.	Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).
139-1	Peter Danby				4 Paddock Wood strategic growth		Object to the overdevelopment at Paddock Wood due to the following;	The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an

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							<p>The Council seem to be overwhelming people with information which is often contradictory.</p> <p>The strategy to build all of the housing in one place - Paddock Wood, rather than distribute fairly around the borough.</p> <p>the loss of orchards and agricultural land.</p> <p>Development of houses on the flood plain.</p> <p>Lack of proposed infrastructure such as health and schools.</p> <p>Consideration of impact on future generations.</p>	<p>existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p> <p>Review of orchards and agricultural land has been undertaken as part of the SLP evidence base.</p> <p>The proposals seek to deliver sustainable long-term development that will be delivered over the next 10 years.</p>
141-1	Rachel Smith				4 Paddock Wood strategic growth		<p>Object to further development at Paddock Wood further to the three developments already taking place at Paddock Wood. Concerned in particular about the following;</p> <p>Local roads being shut for months while new serviced are supplied.</p> <p>Improvements to the commercial area of the town has been thwarted by new housing development.</p> <p>Lack of health facilities.</p> <p>Antisocial behaviour has increased.</p> <p>Development should be limited until a full set of supporting infrastructure is in place - medical, education, public facilities etc.</p>	<p>Construction methods and routing of vehicles can be controlled through the planning application process.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan and it still proposes to support commercially sustainable town centre.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)</p>
141-2	Rachel Smith				4.4 Flood risk and Housing		<p>Concern in regard to flooding around the town after heavy rainfall. Also concern with regard to sewage infrastructure and its capacity to accommodate waste from new developments.</p>	<p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p>
143-1	Richard Perry				4 Paddock Wood strategic growth		<p>Concerned over increased traffic in the area as a result of new development as well as health and other infrastructure which should have been put in place alongside housing growth.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.</p>
143-2	Richard Perry				4.4 Flood risk and Housing		<p>Object to the overdevelopment of the area, particularly in relation to;</p>	<p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and</p>

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							<p>Environment Agency flood areas and the water level is much higher than it used to be.</p> <p>Concern also in regard to sewage leaking out into the road after heavy rain around the Le Temple Road and Dimmock Close.</p> <p>Had to put up with blocked roads, noise, dust, mud, light and traffic outside their house and damage by Southern Water.</p> <p>new housing planned for Whetsted Road area is in an area of high flood risk and most of the area is waterlogged all year round.</p>	<p>PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p>
144-1	Robert Smith				4 Paddock Wood strategic growth		<p>Object to additional housing development at Paddock Wood on the following grounds;</p> <p>Lack of supporting infrastructure such as health, new road junctions and water infrastructure as well as increase in anti-social behaviour, noise and litter.</p> <p>The development proposed is completely unsustainable without a full set of supporting services.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)</p>
145-1	Vincent Greene				4 Paddock Wood strategic growth		<p>Object to the development at Paddock Wood due to the following;</p> <p>Inadequate transport links in the town leading to a range of issues - congestion, pollution, safety issues, noise and verge damage.</p> <p>Concerns over health provision - GP capacity and A&E.</p> <p>Anti-social behaviour as a result of current new housing, lack of police presence and cuts by TWBC in relation to cleaning graffiti.</p> <p>Destruction of the countryside, habitats, biodiversity and productive farmland.</p> <p>Need to consider housing targets now central governments targets have been dropped and prioritise brownfield sites.</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)</p>
145-2	Vincent Greene				4.4 Flood risk and Housing		<p>Object to the development at Paddock Wood due to the fact that Paddock Wood suffers from severe flooding and is at full capacity. Also importance of difference between waste, fresh and surface water. Concern that will lead to a major flood incident with associated health and disease implications.</p>	<p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p>
145-3	Vincent Greene				4.6 Education infrastructure provision		<p>Object to new development at Paddock Wood due to the fact that primary and secondary schools are currently at capacity.</p>	<p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is</p>

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								currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.
147-1	Rosalynne Tucker				4 Paddock Wood strategic growth		<p>Initial concern raised regarding the difficulty in response submission via the portal that could constitute a legal violation of inappropriate facilitation for consultation.</p> <p>Paddock Wood strategic growth:</p> <ul style="list-style-type: none"> Local residents are not against development but it must be limited and supported by infrastructure well before it starts Reduction in housing allocation welcomed. Recent new develops have added nothing in terms of betterment and lack of cohesive strategy disappointing. Proposed significant expansion of PW will cause major disruption for existing residents, with no benefits to be gained PW needs a more vibrant town centre beyond just meeting everyday needs, including a better evening economy. Not helped by recent piecemeal residential developments at prime town centre restricting retail and social space here Ensure delivery as planned masterplanning before further granting permission at town centre vicinity Concerned Paddock Wood Neighbourhood Plan not taken into account - principles should be reflected in growth strategy with a planned approach to the town centre Newly built development not selling Detrimental impact on mature hedgerows, trees and wildlife <p>Health:</p> <ul style="list-style-type: none"> Indication there will be an off-site primary care provision in the short to medium term and a new Health Centre facility off-site in the long term. However, location not known and public transport not good Current 3 developments in PW relied on Brenchley GP surgery (4 miles away) taking excess demand, but now closed to new patients from PW. No capacity at PW Woodlands Surgery. Nearby East Peckham surgery (Maidstone) now closed down. Also cuts to midwifery services (so new influx of babies taking up GP time) No provision for additional cemetery space <p>Crime and Antisocial Behaviour:</p> <ul style="list-style-type: none"> Significant increase in anti-social behaviour and vandalism. Little/no police presence in the town (police station demolished). Will get worse with more housing. 	<p>The consultation has been undertaken by TWBC and many comments have been received.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan, which still supports a vibrant town centre.</p> <p>Discussions have been ongoing with NHS regarding the revised strategy for the Strategic Sites and the proposed level of growth. The NHS has confirmed that a new satellite general practice surgery will be required within the growth area and discussions are ongoing regarding a Statement of Common Ground on this matter.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
147-2	Rosalynne Tucker				4.1 Strategy and Implementation		<p>Structure and Infrastructure:</p> <ul style="list-style-type: none"> Concern town centre is not part of structure plan - welcoming centre providing places to socialise, eat out, a range of independent shops/businesses needed. Omission of town centre is a massive/damaging oversight. Building on Flood Zone 1, growth will be fractured and disconnected for the town centre leading to isolation, poor access to facilities and more car trips. Garden settlement principles not considered (unlike the Neighbourhood Plan) Infrastructure and utilities - no detail what is required and whether short/medium/long term plans being considered. No land available to expand waste water treatment works, already at fill capacity. Stated £230K for this upgrade seems inadequate. Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy: <ul style="list-style-type: none"> Sufficient local infrastructure (town centre, doctors surgery, transport links) Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities) Flood zone 1 - additional water/sewage discharge not causing problems down stream More joined up thinking needed for south east - more dispersed development, not too much in one place <p>Others:</p> <ul style="list-style-type: none"> Inadequacies raised about the early review within 5 year while dismissing the opportunities for a fit-for-purpose preparation. 	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
147-3	Rosalynne Tucker				5 Transport related matters		<p>Transport related matters:</p> <ul style="list-style-type: none"> Plans for road improvements are vague - no clear indication of what is meant by short/ medium/long term and fail to address congestion that will occur on the B2160 Maidstone Road Planned road changes at the Badsell Road/Maidstone Road junction (as part of Badsell Road development) still not commenced Access in/out town centre - junctions already at capacity Note budget for Colts Hill traffic improvements reduced A21 Matfield junction and Colts Hill already at peak capacity - will become worse 	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047 , PS 048 , and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.

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							<ul style="list-style-type: none"> Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse. Strong bias towards improving walking and cycling conditions but to detriment of vehicular access Making Maidstone Road Railway Bridge one-way would lead to increased traffic elsewhere <p>Solutions:</p> <ul style="list-style-type: none"> Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road) Dualling of A228 to Hop Farm roundabout. Block up Lucks and Waggon Lane and their railway bridges and use speed reduction measures. 	
147-4	Rosalynne Tucker				4.4 Flood risk and Housing		<p>Flooding:</p> <ul style="list-style-type: none"> 37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street) Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned Gravelly Stream - causes serious concerns as it floods many properties located next to it. Also accepts diverted water from Tudeley Brook (FOG) which then affects capacity of culvert under railway and when full, floods properties in Ribston Gardens, Laxton Gardens etc. TWBC considers wastewater, freshwater infrastructure and surface water as one issue with no understanding of the difference between these very different and very serious flooding issues for PW Existing homes in PW are more likely to be flooded because of more concreted ground in developed areas Only a matter of time before homes proposed on EA Flood Zone 1 areas are changed to Zone 2 or 3. New homes will be at far higher risk of flooding and higher insurance premiums 	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
147-5	Rosalynne Tucker				4.7 Sports and Leisure provision		<p>Sports and Leisure:</p> <ul style="list-style-type: none"> Disappointed sports hub has been removed without consultation with PW residents and PWTC. Piecemeal approach short-sighted and does not account for future growth Improvements to Putlands would include removal of rugby pitch for further car parking. Also significant flooding on this part of site. PWTC 	

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>already planning a skate park in this location (using S106 monies)</p> <ul style="list-style-type: none"> • TWBC have failed to recognise the sports facilities at the Memorial Field • TWBC identify Green Lane as a site for intensified sports provision due to lack of use but plans to reinstate the Green Lane Football team and not taken into account • Elm Tree sports pitches - home to the largest sports club in PW but have limitations for parking and access (not recognised by TWBC) 	
147-6	Rosalynne Tucker				4.6 Education infrastructure provision		<p>Education and Childcare:</p> <ul style="list-style-type: none"> • Need for a 3FE (900 pupils) school and the proposals for it are noted, but plans for it are uncertain at this time, with the expansion of Mascalls likely result in multifaceted implications, from organisational issues to quality of education, accessibility/transport, burdens on neighbouring localities. • Existing worrying education standards • Vague progress on existing plans for Mascalls/primary school/secondary school and untransparent communication or agreements between KCC/TWBC/TMBC. • School already planned has been put on hold due to insufficient numbers. More information/certainty needed. • No consideration of preschool/nursery provision in Plan - need to provide for increased need 	<p>An option for a new build school has been safeguarded as part of STR/SS 1 in the northwest so that their playing fields form an extension of the green infrastructure network. Secondary school playing fields have been placed in Flood Zone 2 areas, but not as a split site.</p> <p>Developer contributions towards to construction of a 3FE school will be necessary, however if a new build school is required owing to the feasibility of expanding Mascalls Academy not being acceptable then a 4FE school will be required.</p>
147-7	Rosalynne Tucker				4.5 Employment land - review of options		Employment plan induces only lower wage jobs related to warehousing/freight sites – not a desired mixed profession environment – posing pressure on A21, A228 roads for commuting.	
148-1	Rosaria Barreto-Ellis				4.4 Flood risk and Housing		The flood management in the area is not being controlled despite paying high council tax than surrounding areas.	A revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood.
148-2	Rosaria Barreto-Ellis				4 Paddock Wood strategic growth		<p>Object to further development in Paddock Wood and surrounding areas for various reasons including;</p> <p>It has been difficult for local people to engage in the process due to complexity of consultation and no events for people to attend and ask questions. Excessive building been carried out in Paddock Wood over the last few years with detrimental effects, including pollution and traffic congestion. Also lack of health and well being provisions as well as sports and commercial facilities.</p>	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
149-1	Rosemary Danby				4.4 Flood risk and Housing		Concerns over:	A revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> Development in Flood Zone 1 given climate change and historic rainfall, potentially becoming Flood Zone 2/3 later Unfulfilled “Betterment” promise on current mitigation 	PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
149-2	Rosemary Danby				6 Infrastructure		<p>Concerns over:</p> <ul style="list-style-type: none"> Infrastructure: either ‘first’ or at least ‘concurrent’ before development, given inadequate health provisions, delayed traffic improvements, fragile education/sports facilities <p>Proposals as follows:</p> <ul style="list-style-type: none"> Either a new small town led by full infrastructure (as seen proposed at Tudeley) or better alternatives to share the load 	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046)
149-4	Rosemary Danby				Other Matters		<p>The Local Plan is Legally non-compliant regarding procedural matters as follows:</p> <p>Breach of communication and documentation principles Compromised Community Involvement with residents, working groups and PWTC Limited consultation time despite complex documents with fundamental errors</p>	Appropriate consultation has been undertaken with the public stakeholders and statutory consultees.
150-1	Ryan Holliday				4 Paddock Wood strategic growth		Disappointed in the excessive housing expansion.	The proposals result in a reduction of housing in the local plan.
150-2	Ryan Holliday				4.7 Sports and Leisure provision		Concern over the lack of planning for retail space/High Street, Sports Hub despite high tax contribution.	The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan.
151-1	Sandra Dacre				6 Infrastructure	Updating all the utilities, but particularly waste water, for all of Paddock Wood is the only safe way forward.	Concern over the timescales for the provision of utilities, in particular sewage works/waster water infrastructure. To indicate, short, medium and long term os not sufficient - it should state how long in terms of months or years.	Infrastructure will be phased so that it comes forward at the required time.
152-2	Save Capel				The Green Belt Stage 3 Study Addendum (LUC, May 2023) [PS_035]		<p>Save Capel consider that the proposed changes to the Local Plan are unsound in regard to The Green Belt Stage 3 Addendum (PS_035) and make the following points;</p> <ul style="list-style-type: none"> The proposed revised development strategy contained in STR1 is unsound TWBC have carried out too narrow an exercise in regard to the assessment of Green Belt and the release of sites -it has not revisited reasonable alternatives to its strategic site options nor revisited 	A Green Belt Study 3 Addendum report (PS_035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD_3.77 and PS_036) has indicated that all available sites have been utilised in the plan. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>its conclusions set out in the 2021 Development Strategy Topic Paper.</p> <ul style="list-style-type: none"> • Following the deletion of TGV, the Council should have revisited its spatial strategy and looked at other reasonable alternatives, including AONB sites. All TWBC has done is provide an addendum to its stage 3 Green Belt Study. No evidence has been provided that with the removal of TGV, the spatial strategy remains justified. • No evidence to show that TWBC has re-visited its decision to select the growth strategy proposed. • Further detailed points include; <ul style="list-style-type: none"> ○ TWBC has not re-assessed any 'reasonable alternatives' located in either the AONB or outside any designation. ○ Consider that the removal of sites at PW are far more than the Inspector had previously considered. ○ By excluding all GB sites for strategic release - Castle Hill has not been considered, which has other merits. ○ TWBC should have considered other sites and areas around PW rather than GB falling in Capel. ○ All of the reasonable alternatives and options for Paddock Wood should have been revisited by TWBC following receipt of the Inspectors report. ○ TWBC should have considered other GB sites as there are a large number of sites with a harm rating equal or lower than that for TGV or East Capel and SC also query the approach taken in the Stage 3 study and the outcomes. ○ Despite a lengthy review process by TWBC and at considerable expense, TWBC has failed to consider reasonable alternatives to the strategic sites. The scope of the review is limited and the process half-hearted and the results appear to be designed to justify findings of previous stages. ○ Save Capel has repeatedly highlighted and promoted a range of alternative sites at previous stages in plan preparation, which TWBC has chosen to ignore. This includes other strategic locations such as Castle Hill, Horsmonden and Blantyre House were not considered. ○ With the deletion of TGV, the largest proposed release of GB land is in the eastern part of Capel amounting to 148.2 hectares and policy STR1 has been amended to make reference to exceptional 	

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							<p>circumstances. However, TWBC has not set out what these exceptional circumstances are in light of the substantial changes to the development strategy and SC have referred back to the 2021 Topic Paper.</p> <ul style="list-style-type: none"> ○ Housing density is also raised. Whilst SC acknowledges the provision of open spaces in the plan, should be mindful of NPPF requirement to maximise densities where appropriate and should have been reconsidered. • In conclusion, SC considers that the necessary <u>'exceptional circumstances'</u> are <u>not substantiated at the Capel sites.</u> 	
152-9	Save Capel				4 Paddock Wood strategic growth		<p>Save Capel consider that the proposed changes to the Local Plan are unsound in regard to Paddock Wood Strategic Growth and make the following points;</p> <ul style="list-style-type: none"> • Whilst TWBC has sought to address the Inspector's concerns regarding the soundness of the strategic sites policy and the need for much more clarity on when/how the various parcels deliver, Save Capel believes there remains too much uncertainty. • There is still a heavy reliance on Supplementary Planning Documents (SPDs) to deliver the growth. It is well known that SPDs would not be subject to the scrutiny of examination. By their nature they escape the examination process applied to development plan documents. TWBC state that these are progressing alongside the LP, but given the Inspector's comments on over-reliance on SPDs, there should be more detailed policies included now in the examination. 	The policy framework for STR/SS 1 has been revised as part of the council's response to the Initial Findings in order to provide more certainty for developers and residents. A single SPD will be able to support the implementation of the policy by providing additional guidance. The SPD will need to go through a formal adoption process by the council following public consultation.
152-10	Save Capel				6 Infrastructure		<p>Save Capel raise concerns in regard to the following infrastructure issues;</p> <ul style="list-style-type: none"> • that there is no updated Infrastructure Delivery Plan to support the significant changes to the Local Plan. it is therefore unclear what infrastructure is required to make the policy sustainable and when it is to be delivered and by whom. • There is no policy to develop the Colts Hill By-pass, which the examination heard is essential. • There is still no Landscape and Visual Impact Assessment for the Paddock Wood.East Capel area in the evidence base and so Save Capel refer to their own consultants assessments conclusions. 	IDP to be updated at MMs stage

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152-11	Save Capel				4.4 Flood risk and Housing		<p>Save Capel consider the proposed changes to the Local Plan to be unsound in regard to Flood risk and raise the following points;</p> <ul style="list-style-type: none"> • Note that TWBC have responded to the concerns about flood risk and the sequential test by commissioning further masterplanning and flood risk work. • Save Capel question why a blanket density has been applied across the area when there are different flood risk areas which could be taken account of through mitigation. • There has been no evidence provided to support the revised trajectory or mitigation and Save Capel and their consultants consider that the trajectory is not deliverable, raising questions over the soundness of the strategy particularly at the 10 year point taking into account the complex requirements and mitigation of these sites. Therefore, TWBC should have considered alternatives and revisited the SHELAA sites. • A number of issues in regard to flood risk are raised, including; <ul style="list-style-type: none"> ○ Housing development has now been restricted to Flood Zone 1, however policy does not require this restriction. ○ The masterplan shows significant SUD's measures outside of the development parcels and it is unclear how the drainage will interact with adjacent drainage flow provisions. ○ Not clear if the housing capacities are justified and can be delivered safely. ○ JBA's mapping only includes fluvial risk and it is unclear what the cumulative impact is of groundwater, surface water and potential reservoir risk. ○ The strategic storage solution to the south has now been removed which raises concern about mitigation in this area. ○ Concern around the Whetsted parcel and the impact of substrates which will require groundworks to make stable and not clear if this has been assessed and could impact on deliverability and timescales. ○ Concern over safe access and egress into the parcels is raised as the surrounding areas are in Flood Zones 2 and 3. ○ Also it appears that the maximum amount of development has been proposed in the eastern part of Capel Parish. ○ Concern over the siting of the safeguarded land for a new secondary school in Flood Zone 2 and whether this is appropriate or whether the sequential test has been applied. ○ It is considered from previous studies in regard to surface water flooding, that any new development in PW should proposed ways to reduce capacity of the existing network without adding to it, which has not been addressed. 	<p>The Development Strategy Topic Paper, October 2021 (Core Document 3.126) explains how the development strategy for the Pre-Submission Local Plan was formulated (at Section 6.0), including consideration of alternative strategies, and consideration of exceptional circumstances for Green Belt release. An addendum to this topic paper has been prepared following the Inspectors initial findings, document PS-054. It is considered that the Council's approach to the Green Belt accords with paras 145-148 of the NPPF, which has been considered at previous hearing sessions (Matter 3, Issue 4: Management of Development in the Green Belt). The revisions to the Submission Local Plan, subject of this consultation, are supported by appropriate evidence.</p> <p>A revised series of flood modelling reports have been conducted (PS 042, PS 043, and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p> <p>In terms of the proposed Strategic Site allocations, further assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised</p>

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							<ul style="list-style-type: none"> ○ Save Capel question whether the mapping produced by JBA has adequately addressed the potential effects of climate change on future flood zone areas. ○ It is not clear how the developments will be required to discharge foul water separately from the SUD's and other attenuation measures. Save Capel understand that there is no land available for expanding the existing wastewater treatment works in PW and concern about how engaged Southern Water are in the process. 	<p>development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021.</p> <p>An average density is proposed and is set out in the Paddock Wood Growth Follow-on Study (PS_046). That is not to say that all areas when built out will be this density, some areas may be higher and some lower.</p> <p>The trajectory is set out in the evidence that supports the revised growth position (PS_062)</p>
152-12	Save Capel				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		<p>Save Capel consider that the proposed changes to the Local Plan are not sound in regard to Appendix D: Proposed changes to Policy STR/SS1 - The Strategy for Paddock Wood, including land at East Capel. The following issues are raised.</p> <ul style="list-style-type: none"> • The 5 parcels now proposed are disparate and are not well connected raising serious concerns about accessibility, including those residents with disabilities and also impact on the highway network and these have only been listed as 2 parcels. • The sports hub with a range of proposed facilities has now been replaced by only pitches. Also concern around how the facilities would be managed and PW's preference for a location north of PW. • The number of parcels in Capel has increased from 4 to 5 and it is considered to be the worst location for strategic development in the borough for a number of reasons including; It is the lowest lying land with considerable flood risk, it is divided by a mainline railway and only one crossing point proposed which is questionable, it is entirely within the GB and it is agricultural land with productive wheat fields. • Save Capel acknowledge that the central portion of the north-east parcel is outside of the Neighbourhood Plan area of Capel Parish, but given that the parcels are combined in the evidence base and policies, this representation includes the whole parcel as a Capel site for the sake of clarity. • There are inconsistencies with Policy STR/SS1 and DLA's work. 	<p>In the Inspectors Initial Findings it states that there is the need for several main modifications to make it clear what is proposed, where and when at Paddock Wood. These changes are needed for the effectiveness of the Plan and to remove the reliance on supplementary planning documents (ID-012 para 40) Furthermore it is noted that the council will need to ensure that development comes forward in a comprehensive manner, thus ensuring that the vision for a strategically and holistically planned expansion to the town is realised. As submitted, there is insufficient detail on how the parcels will be delivered. The Plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives. (ID-012 para 41). The council has sought to amend policy STR/SS 1 (PS_054) in order to resolve these issues.</p>
152-13	Save Capel				4.6 Education infrastructure provision		<p>Save Capel consider that the proposed changes to the Local Plan are considered to be unsound in regard to secondary school provision. The following comments are made;</p> <ul style="list-style-type: none"> • With the deletion of the secondary school proposed as part of TGV, the policies to support the strategic growth 	<p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for</p>

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							<p>are unclear as there is no main policy that requires the delivery of a secondary school.</p> <ul style="list-style-type: none"> • It is inferred that the preferred option is at Capel, although it is unclear where in an area of high flood risk. concerns raised in relation to the sequential test not having been met, safe and sustainable travel or joint working with neighbouring boroughs. • It is understood that expansion of existing secondary school provision is referring to Mascalls Academy, although there is no evidence that KCC and the Academy Trust support this option and Mascalls would become one of the largest schools in Kent. • It would also seem sensible to retain the potential for Mascalls to expand in the longer term (post 2035). • Save Capel consider that TWBC should re-assess the location of additional secondary school provision and determine options for a more sustainable location that is more central to the borough's needs (avoiding areas of flood risk at Capel) and be aligned to a revised spatial strategy for housing development. 	<p>Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS 046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS 046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum) (PS 054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be.</p>
152-14	Save Capel				5 Transport related matters		<p>Save Capel consider that the proposed changes to the Local Plan are not sound in regard to Transport related matters and raise the following points;</p> <ul style="list-style-type: none"> • Save Capel have appointed consultants to review the further transport work carried out by TWBC. A report is submitted with this rep and the key points are; <ul style="list-style-type: none"> ○ The masterplan for Policy STR/SS1 requires significant infrastructure interventions and there is insufficient evidence to demonstrate that there is a reasonable opportunity of these being deliverable. ○ The attempt to break down the policy area in to six portions and allocate infrastructure/development quanta to each portion undermines the delivery of the infrastructure required to sustain the development and the strategic approach. ○ There are no improvements to cycle safety or amenity proposed to connect the Paddock Wood and East Capel elements. ○ No certainty around a new pedestrian and cycle connection between north-west and south east, East Capel. 	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. No such requirements have been identified at this stage.</p>

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							<ul style="list-style-type: none"> ○ The off-site travel network does not meet minimum design recommendations and relies on infrastructure elements which are not going to be provided. ○ The proposed public transport strategy is not financially viable and can only be delivered through the provision of an in-perpetuity subsidy. ○ Approach to forecasting and traffic modelling appears to be reasonable, however TWBC has failed to publish key evidence explaining how the traffic forecasting data has been manipulated to reflect TWBC's assumptions on modes. ○ the resulting traffic flows published from modelling suggests very high mode shifts away from the car. ○ Evidence base fails to demonstrate any mitigation could be delivered in regard to Colt's Hill and Kippings Cross a number of concerns are raised providing no certainty that these schemes will be delivered at all and can't be considered to be sound. ○ TWBC no longer propose the Five Oak Green Bypass to mitigate the effects on the village section of the B2017. The mitigation now proposed appears to be unachievable. ○ The timescales identified for the delivery of the infrastructure interventions required to support the delivery of housing allocated in STR/SS1 indicates a lead in period of between 4 and 10 years for just 3 major interventions. Also lead in times for the delivery of infrastructure interventions which are critical to the sustainable and acceptable delivery of Policy STR/SS1 are such that the predicted housing trajectory for the policy has no prospect of being delivered. ○ Taking the above into account, it is considered that the plan is unsound in this regard, although SC wishes to find a way to make the plan sound. <p>A full Transport Evidence Addendum is provided by Motion Consultants on behalf of Save Capel as Appendix 1 to this representation.</p>	
153-4	Fernham Homes		Danielle Dunn		4 Paddock Wood strategic growth	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation	<p>Paddock Wood strategic growth - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> • Inspector made clear in initial findings (ref NPPF para 161) that development should not be allocated if there are appropriate, alternative development sites at lower risk of flooding. Option 5 of the revised development strategy aims to reduce housing and employment growth at Paddock Wood/east Capel, ensuring all development is confined to Flood Zone 1. No objection to this approach in new Paddock Wood masterplan and development in areas of low flood risk, but general strategic approach to housing delivery has not considered all options and is therefore objected to. 	The Development Strategy Topic Paper Addendum (PS_054) at Section 2 paras 2.22 – 2.28 summarises the findings of the Stage 3 Green Belt Addendum (PS_035) sets out the approach the Council has taken to sites at Five Oak Green, where reasonable alternative Green Belt sites have been assessed in the SHELAA review of Green Belt sites (PS_036). At Section 3: Updated housing land supply para 13.2, the Development Strategy Topic Paper Addendum sets out that sites at Five Oak Green could be considered as part of a Local Plan review. The SHELAA site assessment sheet for site 143 Land at Tolhurst Road, Five Oak Green acknowledges

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							<ul style="list-style-type: none"> SHELAA site 143 - Land at Tolhurst Road, is located in a low flood risk area, and should be considered - would help provide a small, but important number of residential units, in a significantly constrained housing supply area 	<p>the Low harm rating and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (Core Document 3.77) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in determining site allocations to be included in the new Local Plan.</p> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p>
154-1	Nick and Hilary Andrews				2 Green Belt		<p>Green Belt Para 2.24 - Unsound: Summary of Finding 2.24 states "In addition, with the obvious exception of the strategic sites, it can be seen that the Council has generally proposed those sites with least harm to the Green Belt" . Worrying, that Plan is still proposing 1250 houses in North Western and Western Parcel of SS/STR 1 which specifically separates Paddock Wood from Capel Parish, Five Oak Green and Tonbridge. No evidence presented re least harm to Green Belt.</p>	<p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt.'</p> <p>A Green Belt Study 3 Addendum report (PS 035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD 3.77 and PS 036) has indicated that all available sites have been utilised in the plan.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
154-2	Nick and Hilary Andrews				4.4 Flood risk and Housing	Full and detailed flood defences where the water will flow and the damage it will causedownstream. Full flood analysis based on correct data including risks of Pluvial flood risk. Analysis by TWBC of the Mortgage and Insurance costs for potential homeowners purchasing new houses on an existing flood plain i.e. will flood insurance and mortgages be available to these purchasers.	<p>Flood risk and Housing - unsound:</p> <p>TWBC have not provided further evidence related to pluvial flood risk (a serious risk to flooding). Land in East Capel (North Western Parcel of SS/STR1(A)) is flooded, where the maps in PSA 042, 043 and 044 show no risk of flooding. No detail of where flood water (fluvial or pluvial) will be contained/go. Housing developments are at exceedingly high risk of flooding.</p> <p>PS044 Updated Present Day & Climate Zone flood mapping (fluvial flood risk document) - certain details are based on incorrect/faulty input data. White areas are stated not to flood but flood every year.</p> <p>Documents PS042 and 043 also incorrect in terms of current/historic flooding events</p> <p>Mapping is therefore based on incorrect/faulty data</p> <p>Can't always rely on computer systems being correct.</p> <p>Appears computer modelling has been produced to fit with TWBC's vision of houses rather than a true independent analysis of the flooding issues on flood plain.</p> <p>Climate change will potentially lead to rain fall/flood risks. Likely houses will be unsaleable (mortgage lenders/insurance underwriters have excellent flood risk assessments as their capital is at risk)</p> <p>Unsound of TWBC to allow housing in known flood risk areas that have been brought to attention many times during Local Plan process</p> <p>Solutions:</p> <p>Full detail of flood defences where water will flow and damage it will causedownstream.</p> <p>Full flood analysis based on correct data including risks of pluvial flood risk.</p> <p>Analysis by TWBC of mortgage and Insurance costs for potential homeowners purchasing new houses on an existing flood plain</p>	A revised series of flood modelling reports have been conducted ((PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
154-3	Nick and Hilary Andrews				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel	Removal of the allocation of housing in East Capel, barring the 140 houses outlined in the recently conducted housing needs assessment.	<p>Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel - unsound:</p> <p>Lack of understanding of the distinct separation between land in East of Capel Parish and land in the West of Paddock Wood town - parcelling the land as one.</p> <p>Table 4 of Local Plan Development Strategy Topic Paper - Addendum shows Capel PC's housing allocation as zero. Whereas true impact will still be c1250 houses in East Capel. If TWBC does not know which Parish housing developments are being placed in, the Local Plan has to be unsound.</p> <p>Solution: Removal of allocation of housing in East Capel, (barring the 140 houses in recently conducted housing needs assessment)</p>	

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155-1	Sharon Nissim				4.4 Flood risk and Housing		Request to attend to local resident's voice, address flooding/infrastructure issue and stop new development.	Revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood.
155-2	Sharon Nissim				4.1 Strategy and Implementation		Concerns over the depleted infrastructure to accommodate new housing plans.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
155-3	Sharon Nissim				4 Paddock Wood strategic growth		Concerns over the capacity of infrastructures for doctor surgeries, education provision, accompanied with anti-social behaviours, crimes, deprivation and decline in the town appearance.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
156-1	Sheila Craft				4.4 Flood risk and Housing		Concerns over the approach for flooding: Lack of engagement with Southern Water Assurance of contribution from developers for mitigation Comment on the sequential test, and disagree with the statement in the Inspector's Initial Findings (para. 47) given West parcel contexts and conditions.	Revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood. Southern Water have been part of the consultation exercise and have been engaged in the process to respond to the Initial findings.
156-2	Sheila Craft				Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel		Concerns over the proposed terms and maps of STR/SS 1 - Development Principles: <ul style="list-style-type: none"> Point 8: attenuation measures shown on Map 4 stay adjacent to the existing housing instead of away, putting them at risk? Revised Map 28: Lack of discussion with Network Rail about the drainage culverts to divert runoff away from existing/new developments Point 9: quarry and its impact in the West parcel Point 13: Garden Settlement principle non-evident on Map 4/ non-conformed with TWBC framework masterplan Lack of robust risk assessment (outdated data from EA in 2018), inadequate infrastructure, falling prey for money-driven call for sites 	The results for the updated Paddock Wood streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling. Masterplanning of STR/SS 1 has been undertaken having regard to existing flood risk analysis that supports the SLP. Figure 4 of the Paddock Wood Growth Follow-on Study (PS 046) indicates a broad location adjacent to existing dwellings in order that attenuation measures can be accommodated in an appropriate location. There have been discussions with developers in regards to a proposed flood risk strategy to accommodate surface water run off on both sides of the railway. Revised STR/SS 1 sets out that development should first consider the potential for mineral deposits and make provision for any viably workable minerals to be extracted prior to development commencing on the site. Garden Settlement Principles are included in revised policy STR 1 and STR/SS 1 to ensure

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								that the development at Paddock Wood and land at east Capel comes forward with these principles imbedded in the design and masterplanning. Further detail will be covered by an SPD to support the policy implementation.
157-1	Simon Turner				4.1 Strategy and Implementation		<p>Strategy and implementation:</p> <ul style="list-style-type: none"> Reduction in housing allocation welcomed. Recent new develops have added nothing in terms of betterment and lack of cohesive strategy disappointing. Proposed significant expansion of PW will cause major disruption for existing residents, with no benefits to be gained PW needs a more vibrant town centre beyond just meeting everyday needs, including a better evening economy. Not helped by recent piecemeal residential developments Concerned Paddock Wood Neighbourhood Plan not taken into account - principles should be reflected in growth strategy with a planned approach to the town centre Detrimental impact on mature hedgerows, trees and wildlife Newly built development not selling Concern town centre is not part of structure plan - welcoming centre providing places to socialise, eat out, a range of independent shops/businesses needed. Omission of town centre is a massive/damaging oversight. 	<p>The support for the reduction in housing is noted.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 which will mitigate the development and provide benefits to residents through additional port and leisure facilities, improved sustainable transport measures, additional and improved education facilities, and improved flood resilience for existing residents.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. The policy sets the strategic vision for Paddock Wood Town Centre and including a number of criteria based policies to aid the delivery if mixed uses, increased residential, key pedestrian and cycle friendly environments, improved linkages etc.</p> <p>The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p>
157-2	Simon Turner				4.4 Flood risk and Housing		<p>Flooding:</p> <ul style="list-style-type: none"> 37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street) Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned Gravelly Stream - causes serious concerns as it floods many properties located next to it. Also accepts diverted water from Tudeley Brook (FOG) which then affects capacity of culvert under railway 	<p>The further flooding assessment and modelling work has been carried out for land at Paddock Wood and East Capel. the results of this updated streams and river modelling (PS 042 & PS 043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a</p>

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							<p>and when full, floods properties in Ribston Gardens, Laxton Gardens etc.</p> <ul style="list-style-type: none"> • TWBC considers wastewater, freshwater infrastructure and surface water as one issue with no understanding of the difference between these very different and very serious flooding issues for PW • Existing homes in PW are more likely to be flooded because of more concreted ground in developed areas • Only a matter of time before homes proposed on EA Flood Zone 1 areas are changed to Zone 2 or 3. New homes will be at far higher risk of flooding and higher insurance premiums 	<p>larger area than previously shown in past flood modelling. The Inspector directly references a development strategy (Option 3) where all residential development is removed from Flood Zones 2 and 3 and sited within Flood Zone 1 land only where the flooding risk is lowest. As such, the updated flood modelling data has directly influenced the revised development zones (i.e. flood zone 1 land only) resulting in the revised proposal of approximately 2,500 dwellings and a reduction of approximately 1000 dwellings from the Examination Local Plan 2021. It is expected that detailed surface water drainage proposals would form part of the detailed design stage for each development parcel. This will include the use of SUDS and is not usually expected as part of overarching allocations.</p>
157-3	Simon Turner				4 Paddock Wood strategic growth		<p>Transport issues:</p> <ul style="list-style-type: none"> • Plan includes sustainable transport, but has failed to consider lack of employment opportunities in Paddock Wood and poor public transport facilities. Increase in population will lead to significant increase in traffic which already has high air pollution during rush hour • Plans for road improvements are vague - no clear indication of what is meant by short/ medium/long term and fail to address congestion that will occur on the B2160 Maidstone Road • Planned road changes at the Badsell Road/Maidstone Road junction (as part of Badsell Road development) still not commenced • Access in/out town centre - junctions already at capacity • Note budget for Colts Hill traffic improvements reduced • A21 Matfield junction and Colts Hill already at peak capacity - will become worse • A peak times there is significant congestion on A228 Seven Mile Lane, B2017 (PW to FOG) and B2015 to Wateringbury from PW with these roads already over capacity • Five Oak Green will require a by-pass which seems to have been removed • Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse. • Strong bias towards improving walking and cycling conditions but to detriment of vehicular access • Making Maidstone Road Railway Bridge one-way would lead to increased traffic elsewhere <p>Solutions:</p>	<p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS 053). A bus feasibility study (PS 058) has identified a number of improvements that can be made as part of the strategic delivery.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road) Dualling of A228 to Hop Farm roundabout. Block up Lucks and Waggon Lane and their railway bridges and use speed reduction measures. <p>Other:</p> <ul style="list-style-type: none"> Sign the Plan is inadequate if needing to be reviewed in 5 years. Use resources to make Plan fit for today Indication there will be an off-site primary care provision in the short to medium term and a new Health Centre facility off-site in the long term. However, location not known and public transport not good Current 3 developments in PW relied on Brenchley GP surgery (4 miles away) taking excess demand, but now closed to new patients from PW. No capacity at PW Woodlands Surgery. Nearby East Peckham surgery (Maidstone) now closed down. Also cuts to midwifery services (so new influx of babies taking up GP time) No provision for additional cemetery space Plan only looks to allow for more warehousing / freight movement sites in the area - will increase HGV numbers without any road improvements to/from A21, A228 etc. Will only allow for lower wage jobs and won't encourage/support a more mixed employment environment resulting in increased commuting (to support high mortgage/house prices) Plan does not meet 15 year plan period Insufficient consultation with PWTC and local residents 	education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS 046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
157-4	Simon Turner				4.7 Sports and Leisure provision		<p>Sports and Leisure:</p> <ul style="list-style-type: none"> Disappointed sports hub has been removed without consultation with PW residents and PWTC Piecemeal approach short-sighted and does not account for future growth Improvements to Putlands would include removal of rugby pitch for further car parking. Also significant flooding on this part of site. PWTC already planning a skate park in this location (using S106 monies) TWBC have failed to recognise the sports facilities at the Memorial Field TWBC identify Green Lane as a site for intensified sports provision due to lack of use but plans to reinstate the Green Lane Football team and not taken into account Elm Tree sports pitches - home to the largest sports club in PW but have limitations for parking and access (not recognised by TWBC) 	<p>Due to the revised strategy for the spatial positioning of the Strategic Sites development parcels (largely to take account of the conclusions raised within the updated flood modelling), with reduced development numbers as well as the removal of proposed allocation of Tudeley Garden Village has meant that the previous Sports Hub proposal (included within the Submission Local Plan), is no longer the right option.</p> <p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed,</p>

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							<ul style="list-style-type: none"> Above points need to be considered as part of a robust sports strategy in consultation with PWTC and local people 	such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.
157-5	Simon Turner				4.6 Education infrastructure provision		<p>Education:</p> <ul style="list-style-type: none"> Need for a 3FE (900 pupils) secondary school and the proposals for it are noted, but plans for it are uncertain at this time. New developments will lead to large increases in secondary age pupils in Paddock Wood. Plans for a primary school are also vague. School already planned has been put on hold due to insufficient numbers. More information/certainty needed. No consideration of preschool/nursery provision in Plan - need to provide for increased need 	<p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.</p> <p>Site specific allocations and supplementary planning document will provide additional policy detail regarding the delivery for the secondary school, its access to sustainable transport in addition to the revised policy wording in STR/SS 1.</p>
158-1		Stop Over Development of Paddock Wood			4 Paddock Wood strategic growth		<p>Paddock Wood strategic growth (other comments) - legally compliant but unsound:</p> <ul style="list-style-type: none"> Stop Over Development of Paddock Wood/local residents are not against development but it must be limited and supported by infrastructure well before it starts Reduction in housing allocation welcomed. Recent new develops have added nothing in terms of betterment and lack of cohesive strategy disappointing. Proposed significant expansion of PW will cause major disruption for existing residents, with no benefits to be gained PW needs a more vibrant town centre beyond just meeting everyday needs, including a better evening economy. Not helped by recent piecemeal residential developments Concerned Paddock Wood Neighbourhood Plan not taken into account - principles should be reflected in growth strategy with a planned approach to the town centre Detrimental impact on mature hedgerows, trees and wildlife Newly built development not selling Insufficient consultation with Paddock Wood residents and engagement with Paddock Wood Town Council 	<p>The support for the reduction in housing is noted.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan, which still supports a vibrant town centre.</p> <p>The NPPF states that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (para 13).</p> <p>The SLP includes suite of policies to protect, amongst other things, hedgerows, trees and wildlife (EN1, EN9, EN10). Revised policy as set out in the DSTPA (PS_054) states that development shall include a green and blue infrastructure plan.</p> <p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> 10 year duration of revised plan does not meet NPPF15 year minimum requirement Plan should be about creating and supporting a community with homes and infrastructure that have a balanced, vibrant, economically sustainable town, not just about meeting central government housing targets <p>Health:</p> <ul style="list-style-type: none"> Indication there will be an off-site primary care provision in the short to medium term and a new Health Centre facility off-site in the long term. However, location not known and public transport not good Current 3 developments in PW relied on Brenchley GP surgery (4 miles away) taking excess demand, but now closed to new patients from PW. No capacity at PW Woodlands Surgery. Nearby East Peckham surgery (Maidstone) now closed down. Also cuts to midwifery services (so new influx of babies taking up GP time) No provision for additional cemetery space <p>Crime and Antisocial Behaviour Significant increase in anti-social behaviour and vandalism. Little/no police presence in the town (police station demolished). Will get worse with more housing.</p>	<p>forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>Discussions with local councillors, Paddock Wood Town Council and Capel Parish Council have continued through the process of revising the Strategic Sites strategy following the Inspector's Initial comments. The Council has engaged with local stakeholders and has sought to reflect any views within the revised SS strategy.</p> <p>The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS_046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p>
158-2		Stop Over Development of Paddock Wood			4.1 Strategy and Implementation		<p>Structure and Infrastructure - legally compliant but unsound:</p> <ul style="list-style-type: none"> Concern town centre is not part of structure plan - welcoming centre providing places to socialise, eat out, a range of independent shops/businesses needed. Omission of town centre is a massive/damaging oversight. Building on Flood Zone 1, growth will be fractured and disconnected for the town centre leading to isolation, poor access to facilities and more car trips. Garden settlement principles not considered (unlike the Neighbourhood Plan) Infrastructure and utilities - no detail what is required and whether short/medium/long term plans being considered. No land available to expand waste water treatment works, already at fill 	<p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan.</p> <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046)</p> <p>The Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS_061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>capacity. Stated £230K for this upgrade seems inadequate.</p> <ul style="list-style-type: none"> Lack of evidence of working with neighbouring LA's to deliver development targets to satisfy: <ul style="list-style-type: none"> Sufficient local infrastructure (town centre, doctors surgery, transport links) Demand for where people wish to live - lack of demand because of flood risk (therefore people being moved from London authorities) Flood zone 1 - additional water/sewage discharge not causing problems down stream More joined up thinking needed for south east - more dispersed development, not too much in one place 	<p>Il Table 2 compared with the previous equivalent results table' and that there is no change to viability overall.</p> <p>The Council has undertaken significant engagement as part of the preparation of the local plan as set out in the Duty to Cooperate Statement (CD 3.132 - see the Core Document List) which was acknowledged in the Inspectors decision to proceed to stage 2 of the examination (ID-08).</p>
158-3		Stop Over Development of Paddock Wood			5 Transport related matters		<p>Transport related matters - legally compliant but unsound:</p> <ul style="list-style-type: none"> Plans for road improvements are vague - no clear indication of what is meant by short/ medium/long term and fail to address congestion that will occur on the B2160 Maidstone Road Planned road changes at the Badsell Road/Maidstone Road junction (as part of Badsell Road development) still not commenced Access in/out town centre - junctions already at capacity Note budget for Colts Hill traffic improvements reduced A21 Matfield junction and Colts Hill already at peak capacity - will become worse Rural lanes in Paddock Wood are narrow and dangerous due to already increased traffic from new builds, to detriment of existing residents. Will get worse. Strong bias towards improving walking and cycling conditions but to detriment of vehicular access Making Maidstone Road Railway Bridge one-way would lead to increased traffic elsewhere <p>Solutions:</p> <ul style="list-style-type: none"> Restrictions preventing new developments using Queen Street (funnel traffic to Badsell Road) Dualling of A228 to Hop Farm roundabout. Block up Lucks and Waggon Lane and their railway bridges and use speed reduction measures. <p>Other: Sign the Plan is inadequate if needing to be reviewed in 5 years. Use resources to make Plan fit for today</p>	<p>Highway improvements have been identified as part of the extensive transport modelling that has been undertaken. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in junctions or routing etc will be considered at the time.</p> <p>Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time. The B2017 / A228 Badsell Road junction is identified for improvement and contributions have been collected from previous growth at Paddock Wood. Much of the highway infrastructure delivery will be on a 'monitor and manage' where by such infrastructure improvements will be designed in the first instance to support modal shift and sustainable transport measures. Active travel networks will extend beyond proposed site delivery and masterplanning into existing networks which will be improved as set out in the Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling (PS_053). A bus feasibility study (PS_058) has identified a number of improvements that can be made as part of the strategic delivery.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
158-4		Stop Over Development of Paddock Wood			4.4 Flood risk and Housing		<p>Flooding - legally compliant but unsound:</p> <ul style="list-style-type: none"> • 37% increase in rainfall because of global warming and impacts downstream - a concern and not mentioned • No mention of flood mitigation for properties south and north of railway line (Lucks and Waggon Lanes, Queen Street) • Existing overflow sewage problems - into homes and gardens. Sewage capacity needs to be addressed/increased. No solution mentioned • Gravelly Stream - causes serious concerns as it floods many properties located next to it. Also accepts diverted water from Tudeley Brook (FOG) which then affects capacity of culvert under railway and when full, floods properties in Ribston Gardens, Laxton Gardens etc. • TWBC considers wastewater, freshwater infrastructure and surface water as one issue with no understanding of the difference between these very different and very serious flooding issues for PW • Existing homes in PW are more likely to be flooded because of more concreted ground in developed areas • Only a matter of time before homes proposed on EA Flood Zone 1 areas are changed to Zone 2 or 3. New homes will be at far higher risk of flooding and higher insurance premiums 	<p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p> <p>The results for the updated Paddock Wood streams and river modelling (PS_042 & PS_043) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data (August 2022) and therefore effects a larger area than previously shown in past flood modelling.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>
158-5		Stop Over Development of Paddock Wood			4.7 Sports and Leisure provision		<p>Sports and Leisure - legally compliant but unsound:</p> <ul style="list-style-type: none"> • Disappointed sports hub has been removed without consultation with PW residents and PWTC. • Piecemeal approach short-sighted and does not account for future growth • Improvements to Putlands would include removal of rugby pitch for further car parking. Also significant flooding on this part of site. PWTC already planning a skate park in this location (using S106 monies) • TWBC have failed to recognise the sports facilities at the Memorial Field 	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS_046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> • TWBC identify Green Lane as a site for intensified sports provision due to lack of use but plans to reinstate the Green Lane Football team and not taken into account • Elm Tree sports pitches - home to the largest sports club in PW but have limitations for parking and access (not recognised by TWBC) 	
158-6		Stop Over Development of Paddock Wood			4.6 Education infrastructure provision		<p>Education and Childcare:</p> <ul style="list-style-type: none"> • Need for a 3FE (900 pupils) secondary school and the proposals for it are noted, but plans for it are uncertain at this time. New developments will lead to large increases in secondary age pupils in Paddock Wood. • Plans for a primary school are also vague. School already planned has been put on hold due to insufficient numbers. More information/certainty needed. • No consideration of preschool/nursery provision in Plan - need to provide for increased need 	The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS_046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum) (PS_054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.
158-7		Stop Over Development of Paddock Wood			4.5 Employment land - review of options		<p>Employment - legally compliant but unsound:</p> <ul style="list-style-type: none"> • Plan only looks to allow for more warehousing / freight movement sites in the area - will increase HGV numbers without any road improvements to/from A21, A228 etc. 	The Employment Land Provision at Paddock Wood Paper (PS_045) sets out the context for the revised employment allocations at Paddock Wood which would provide economic

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> Will only allow for lower wage jobs and won't encourage/support a more mixed employment environment resulting in increased commuting (to support high mortgage/house prices) 	growth to the area and help support the proposed growth.
159-1	Sue Bennett				4.1 Strategy and Implementation		<p>Oppose to the whole plan with regard to Paddock Wood due to:</p> <p>Insufficient infrastructure meeting housing development: dangerous roads, road collapse, water mains No good services to justify for the higher council tax (parish rate) in Paddock Wood to Tunbridge Wells</p>	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046)
159-2	Sue Bennett				4.6 Education infrastructure provision		Request builders to provide school/contribute to its operations as existing ones reaching their full capacity.	The Strategic Sites (Master planning) Addendum paper (PS 046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools.
159-3	Sue Bennett				4 Paddock Wood strategic growth		Compulsory request to builders for medical centre and hospital provisions as existing ones closed or overran.	The growth proposed for Paddock Wood would be delivered along with the necessary infrastructure to support it in terms of education, highways and connectivity, health etc which would funded by and equalised across the strategic development sites. The Strategic Sites (Master planning) Addendum paper (PS 046) sets out at table 8 the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.
159-4	Sue Bennett				4.4 Flood risk and Housing		Object to the concrete building in flood plain while bulldozing trees that reduce flooding.	A revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
159-5	Sue Bennett				4.7 Sports and Leisure provision		Undelivered swimming pool, lack of high street shops and competitive rents.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046) including a high level of sport and leisure facilities. Proposed rewording of policy STR/SS1 includes a section on Strategic Infrastructure including 'f) Sports and leisure

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS 054).
160-1	Susan Marchant				4.1 Strategy and Implementation		Object to the plans at East Capel owing to: <ul style="list-style-type: none"> Flood plain constraint and environment consequences Struggling infrastructure, e.g. education and health provisions 	A revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3. Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046).
161-1	Zoe Patten Ferguson				4.1 Strategy and Implementation		Object to the amount of housing proposed for Paddock Wood without the associated infrastructure, such as shopping, schooling, medical and recreation activities, which is considered to be unsustainable and against the NPPF.	Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046).
161-2	Zoe Patten Ferguson				4.4 Flood risk and Housing		Concern with regard to development on the floodplain and the actual need for the quantum of houses proposed in the Local Plan.	A revised series of flood modelling reports have been conducted (PS 042 , PS 043 , and PS 044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.
163-1	Sue Lovell and Alan Inhester				4 Paddock Wood strategic growth		The Proposed amendments to the Local Plan are unsound due to the following reasons; <p>Lack of consultation with Paddock Wood residents and the Town Council.</p> <p>Reduction of housing numbers proposed is welcomed, but concern over complete lack of infrastructure and cohesive strategy.</p> <p>Town Centre needs to be improved with better facilities, particularly in the evenings.</p> <p>Concern over anti-social behaviour and lack of policing.</p> <p>Loss of suitable town centre sites to residential, limiting the possibility for further commercial and social space - requires proper masterplanning.</p> <p>proposed amendments fail to consider the PW Neighbourhood Plan, particularly in relation to the Town</p>	The Council has undertaken a thorough consultation on the proposed changes to the Development Strategy, and has been in discussion with local members Paddock Wood Town Council and Capel Parish Council through the process to revise the Strategic Sites strategy. <p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with masterplanners (PS 046) to ensure a well masterplanned approach is taken.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>Centre - concern over previous loss of commercial premises to residential which is not selling.</p> <p>Concern over loss of hedgerows and displaced wildlife already happening as a result of ongoing developments.</p> <p>Concern over noise and light pollution.</p> <p>Concern over the fact that the town centre is not considered within the revised structure plan and should be dealt with as a separate supplementary paper.</p> <p>Query whether the plan considers employment opportunities and resultant increase in traffic at peak times, in particular on key roads/junctions such as the B2017 Badsell Road.</p> <p>Concern over reduced budget for Colts Hill Bypass and highlight specific issues around congestion from Matfield to the A21 and reference to example from Kings Hill.</p> <p>Bias towards walking and cycling will be to the detriment of vehicular access and resultant implications.</p> <p>Plan is not fit for purpose and should be fixed now rather than reviewing in 5 years time.</p> <p>Concern over lack of health facilities and not clear what will be provided as part of proposed development - currently at capacity.</p> <p>No provision for additional cemetery space in Paddock Wood.</p> <p>No evidence of TWBC working with neighbouring authorities to meet development needs on unconstrained sites or of TWBC re-considering its development strategy approach.</p> <p>Only employment development proposed is for more warehousing which will increase freight and HGV movements in the town and surrounding area and are generally lower paid jobs.</p> <p>The Plan will have a very negative impact on residents of Paddock Wood.</p>	<p>to the Inspectors Initial Findings on the Local Plan and it still proposes to support commercially sustainable town centre.</p> <p>The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan.</p> <p>The SLP includes suite of policies to protect, amongst other things, hedgerows, trees and wildlife (EN1, EN9, EN10).</p> <p>The Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS_061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix II Table 2 compared with the previous equivalent results table' and that there is no change to viability overall. £7.25M has been factored into the Colts Hill bypass and includes funds already secured through KCC Highways for development that has been progressed at Paddock Wood</p> <p>The Council has undertaken significant engagement as part of the preparation of the local plan as set out in the Duty to Cooperate Statement (CD 3.132 - see the Core Document List) which was acknowledged in the Inspectors decision to proceed to stage 2 of the examination (ID-08).</p>
163-2	Sue Lovell and Alan Inhester				4.4 Flood risk and Housing		<p>Plan is considered to be unsound due to the following;</p> <p>Lack of engagement with residents of Paddock Wood and the Town Council.</p> <p>Due to the fact that development is only proposed to be built on Flood Zone 1, it leads to a fractured series of development areas with disconnect from the town centre, rather than Garden settlement principles as set out in the Neighborhood Plan.</p> <p>Concern over vague detail of what is required for utilities, sewage/waster water treatment works.</p> <p>Significant flooding in Paddock Wood from existing streams and water courses as well as culverts which have not been taken into account.</p>	<p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p> <p>The additional masterplanning work (PS_046) shows how the development can be connected be greenspace as part of a landscape led approach.</p>

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							<p>TWBC seem to have considered waste water, freshwater and surface water as one issue with little consideration of the serious flooding issues in Paddock Wood.</p> <p>No consideration of increased rainfall as a result of global warming and the impact this will have on existing infrastructure and the new homes proposed.</p> <p>Plan is not consistent or in conformity with the NPPF.</p>	
163-3	Sue Lovell and Alan Inhester				4.7 Sports and Leisure provision		<p>The amended plan is not sound for the following reasons;</p> <p>Insufficient consultation with local residents and lack of engagement with Paddock Wood Town Council.</p> <p>The removal of the Sports Hub from the plan is very disappointing and will result in piecemeal development which is not appropriate.</p> <p>Improvements to Putlands would include the removal of a rugby pitch for further car parking and there are flooding concerns.</p> <p>TWBC failed to recognise sports facilities at the memorial field and concern over approach for Green Lane and Elm Tree and consider that a robust sports strategy for Paddock Wood is required.</p>	<p>The council has engaged with PWTC through the stages of the process to review the growth at Paddock Wood and land east of Capel. Given the reduction in overall growth in the plan a reduction in Sport and Leisure facilities has been necessary. The Council has looked to split sports growth across three sites, which includes improvements to Putlands Leisure centre and associated facilities and provides 4.5ha of land for further pitch provision car parking and pavilion. The Paddock Wood Growth Follow-on Study (PS_046) sets these details out.</p>
163-4	Sue Lovell and Alan Inhester				4.6 Education infrastructure provision		<p>Plan is unsound due to the following reasons;</p> <p>Insufficient consultation with Paddock Wood residents and engagement with the Town Council</p> <p>Concern over education provision now that the new school envisaged to be at Tudeley is no longer planned.</p> <p>Query whether appropriate to expand Mascalls and other option at land north of Paddock Wood doesnt appear to be viable.</p> <p>Plans for primary school expansion also appear to be vague and not clear what the provision will be.</p> <p>Insufficient preschool and nursery provision in the town.</p>	
166-1		Crest Nicholson	Jane Piper	Stantec	15 Proposed strategic policy revisions		<p>Paddock Wood - legally compliant but unsound</p> <p>Supports the overall principle of the revised Policy STR/SS1, which now consists of four parts, but the wording needs to be more effective and concise. The Local Plan should be read as a whole. Therefore, it should be as concise as possible with minimal repetition. For example, criterion 3 of the Development Principles specifies that housing mix should accord with Policy H1. This is repeated (in less detail) in each of the Parcel Requirement Sections.</p> <p>The response includes suggested policy amendments to the revised Policy STR/SS1 to make it more effective and concise. This is for the Development Principles section and the North-Western Parcel Requirements, which could be extrapolated to the other parcels.</p>	

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>This will help the public understand what is proposed and required of the whole site and each parcel. It will also result in a clearer idea of what each parcel will deliver in terms of infrastructure.</p> <p>In addition to changes to make the policy more concise, the suggested changes also relate to the points noted below and in comments added under different consultation points.</p> <p>Criterion 6 of the Development Principles references zero and low carbon development in line with Policy EN3. This (along with Policy EN1 and EN3) needs to be considered in the context of the Written Ministerial Statement of the Minister of State for Housing on the 13 December 2023. There is no need for additional standards to be placed on developments through Local Plan policies which vary from the requirements in national government guidance.</p> <p>Criterion 13 and 15 of the Development Principles should be amended to reflect discussions with officers on the use/production of an SPD. Crest Nicholson and Dandara are already in discussions on producing a Western Masterplan and this can be reflected in a Statement of Common Ground.</p> <p>Policy STR/SS1 also needs to be clearer that any amendments to the Strategic Sites Masterplanning and Infrastructure Study would be subject to consultation with all relevant parties.</p>	
166-2		Crest Nicholson	Jane Piper	Stantec	4.7 Sports and Leisure provision		<p>Paddock Wood sport and leisure provision - legally compliant but unsound</p> <p>Criterion f of the Strategic Infrastructure section of Policy STR/SS1 should more clearly set out the revised leisure strategy set out in PS_046. The mechanism for the delivery of the sport and leisure provision needs to be clarified so as not to prejudice the housing trajectory.</p> <p>It is not clear how the revised strategy and requisite contributions fit in with the Infrastructure Delivery Plan (IDP), as no revised IDP was published in the Post-Initial Findings Evidence Base Documents.</p> <p>Para 4.61 of PS_054 notes the consideration being given on replacing the grass football pitch with an artificial surface which can be used more frequently. Crest Nicholson has no objection to this in principle, however, the associated costs are different and reassurance needs to be provided as to what is allowed for in the Viability Assessment.</p>	

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
166-3		Crest Nicholson	Jane Piper	Stantec	4 Paddock Wood strategic growth		<p>Paddock Wood health provision - legally compliant but unsound</p> <p>Policy STR/SS1- criterion 2(g) of the Strategic Infrastructure requirements states that health provision should be split across one or all of the local centres. However, PS_046 indicates that health provision is now to be off site. Also, PS_061b identifies an infrastructure cost of £3m against a new health care facility. Clarity is sought as the evidence base is currently contradictory and the matter has not been discussed with the developers.</p>	
166-4		Crest Nicholson	Jane Piper	Stantec	4.6 Education infrastructure provision		<p>Paddock Wood secondary education provision - legally compliant but unsound</p> <p>Criterion h of the Strategic Infrastructure section of Policy STR/SS1 is confusing. It is suggested that the new development at Paddock Wood only generates enough secondary school provision for a 3FE school, but that is not large enough for a standalone school. If a new secondary school is required in the North Western Parcel, KCC would want a 4FE school with land to expand to a 6FE.</p> <p>Further explanation and clarity is required to explain the feasibility of expanding Mascalls Academy to accommodate a 3FE expansion, or 2FE considering the current percentage of pupils that attend selective schools (35%), taking it to 10 or 11FE school. A feasibility study is being undertaken in consultation with Leigh Academy Trust and the consultants acting for TWBC/KCC. Notwithstanding the current Persimmon application which includes 3.84Ha of land adjacent to Mascalls Academy to facilitate the potential expansion of the school, it has been acknowledged there is likely to be sufficient land for expansion</p> <p>Mascalls Academy currently occupies land covering a total of 13.4ha. DfE guidance recommends an 11FE school with a sixth form consists of a site area of 10.8-13.57ha. Therefore, the feasibility study is predicated on using the schools existing site, whilst acknowledging there is additional land if required.</p> <p>The assumption in PS_046 that secondary school requirements will most likely be addressed through the safeguarding of land for a 6FE school on land to the west of Paddock Wood needs to be considered in context, and safeguarding of land within STR/SS1(A) addressed accordingly.</p>	<p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS_046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1 - The Strategy for Paddock Wood, including land at east Capel (Appendix D of Local Plan Development Strategy Topic Paper – Addendum) (PS_054)), this is also set out within the Masterplanning Addendum Paper and the Council is currently undertaking feasibility work regarding the potential for Mascalls School to be able to accommodate the expansion needed and associated changes.</p>

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166-5		Crest Nicholson	Jane Piper	Stantec	5 Transport related matters		<p>Paddock Wood transport - legally compliant but unsound</p> <p>In relation to criterion i of Strategic Infrastructure section of Policy STR/SS1, does not object to the principle of contributing to a bridge and providing land for it, but objects to the wording of the policy. Crest Nicholson maintain it is for the Council to facilitate the provision of the bridge with Network Rail.</p> <p>It is not clear how modifying Scenario 2 in CD 3.66, as set out in PS_046, has taken on board the proposed response to the provision of secondary education and sports. Nor is it clear if an alternative option has been considered in terms of secondary education provision.</p> <p>The response includes an appendix - Review of Key TWLP Documents by Ardent, Crest's Highways Consultant.</p> <p>The summary of the document (as summarised in the consultation response by Stantec on behalf of Crest Nicholson) is as follows:</p> <ul style="list-style-type: none"> • The north-south railway crossing should be clearly outlined as a strategic improvement for the town rather than a development-specific link, as indicated on Page 40 of the LCWIP – Stage 2 (October 2021), which states that: <i>“The extent of routes to the north were limited by the lack of crossing points across the railway line which is an overarching issue for the town and further enhancing connectivity with the north of Paddock Wood.”</i> <p>The benefit of such a strategic designation is to secure the necessary planning policy support for the implementation of the foot/cycle bridge, given that participation from Network Rail (NR) would be require to effect the improvements</p> <ul style="list-style-type: none"> • Given the reduction in dwelling numbers, it is suggested the bus gate should be removed from the masterplan at this policy stage, allowing for more detail to be investigated when more detail on the configuration of the E-W development spine road is fully tested through the Transport Assessment that would be prepared at the planning application stage • Some flexibility should be adopted around the ambitious 10% bus mode share with the Travel Plans for each individual developments, whereby bus patronage would be monitored to ensure that service frequency and demand can be match in achieving the viable bus services • any public transport strategy option that results in a significant shortfall at the end of the (Local Plan) period should be discounted if it is not able to demonstrate long-term viability of the services (and thus sustainability). Any loner term financial support needs to meet Regulation 122 tests. The concept of Demand Responsive Travel should be 	<p>As and when development gains planning permission it is anticipated a Paddock Wood and land at east Capel Delivery Board will be established in order to monitor and co-ordinate the delivery of infrastructure across the strategic site. This will include the developers and respective stakeholders and be a requisite of the SPD and respective legal agreements associated with development.</p> <p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. Two alternative scenarios have been considered and are set out and included as part of the revised strategy in response to the Inspectors Initial Findings.</p> <p>The Strategic Sites (Master planning) Addendum paper (PS_046), sets out how the education infrastructure has been re-evaluated as part of the revised strategy. In particular with the removal of the Tudeley Garden Village proposals and the reduction in housing numbers of approximately 1000 dwellings for Paddock Wood and East Capel. This paper outlines at para 2.22 that a maximum need of 4FE Primary Provision is needed which would be provided by 2x 2FE schools. The Structure Plan for Paddock Wood and East Capel (Figure 5 of The Strategic Sites (Master planning) Addendum paper (PS_046)), shows that the new primary schools would be sited within the strategic sites to the East and West of the existing Paddock Wood town. For Secondary School needs, The Strategic Sites (Master planning) Addendum paper (PS_046) discusses this at para 3.2 and outlines that a 3FE secondary requirement would be generated by the proposed Strategic Growth. This could be met either through the expansion of the existing Mascalls Secondary School, or through the construction of a new school within the Strategic Site to the west of Paddock Wood within East Capel. Land for both schemes is safeguarded through the proposed amended wording of Policy STR/SS1.</p> <p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco</p>

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							<p>reviewed as an alternative to all of the options considered within the study, with the ambition to make the service both convenient and sustainable over the longer term</p> <ul style="list-style-type: none"> The removal of the Tudeley Garden Village from the Local Plan does not change the fact that the sole responsibility for the A228 Colts Hill Bypass would itself not rest on the strategic allocations at Paddock Wood either, and that some form of external funding should be identified in view of its wider benefits. The trigger point for the link into a potentially expanded Badsell Roundabout is “<i>estimated to be approximately 2000 dwellings.</i>” On the basis of the evidence presented, it cannot categorically be stated with any degree of confidence that the A228 Colts Hill Bypass is solely a requirement of the strategic allocations, when its trigger point could realistically post-date the period of the Local Plan In terms of wider highway management, it is not doubted that the Colts Hill bypass may provide some benefit to the wider network, however the Local Plan must adopt a forward-thinking approach regarding the creation of new road infrastructure and prioritise the implementation of sustainable transport schemes, particularly where other assumptions have been based on securing higher level of modal shift. 	<p>(PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p> <p>The comments regarding the revised policy wording of STR/SS1 are noted. It is expected that the revised policy will be discussed as part of the future Local Plan Hearings and any alterations subsequently agreed by the Inspector, could be captured by the Main Mods process.</p>
169-1	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	15 Proposed strategic policy revisions		<p>Introduction -legally non-compliant/unsound:</p> <p>Overall, PWTC considers proposed changes to Local Plan to be unsound and not legally compliant. This relates to overall proposed process, changes to policies, supporting evidence base and Sustainability Appraisal (unsound as not positively prepared/justified/effective/consistent with national policy).</p> <p>Development Strategy Topic Paper Addendum does not consider full range of modifications that may be required to the Local Plan, as only focussed on matters raised by the Inspector that need reviewing to enable the examination to proceed. Given time since receiving the Inspector's Letter, TWBC could have provided a more complete set of proposed changes. No indication of what other changes may need to be made.</p> <p>Disappointing TWBC has not responded to PWTC's request for an extension of the consultation deadline. TWBC's Guidance/Explanation Note states the consultation is a non-statutory process -unclear what is meant by this.</p>	<p>The Development Strategy Topic Paper, October 2021 (Core Document 3.126) explains how the development strategy for the Pre-Submission Local Plan was formulated (at Section 6.0), including consideration of alternative strategies, and consideration of exceptional circumstances for Green Belt release. An addendum to this topic paper has been prepared following the Inspectors initial findings, document PS-054 which considers all matters raised in the Initial Findings. Further Main Modifications which may have been discussed as part of public hearings in 2022 will be considered at a later stage.</p>

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169-2	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	Other Matters		<p>Legally non-compliant/unsound:</p> <p>Engagement and Consultation with the Town Council and Stakeholders</p> <ul style="list-style-type: none"> No opportunity for PWTC/others to participate in any consultation activities with TWBC during consultation period. Given scale and complexity of proposals - should have been more engagement activities Accessibility of consultation documentation poor and difficult for many in the community to understand (e.g. 20 new technical documents, incorrect cross referencing) Approach taken does not comply with TWBC's Statement of Community Involvement Paddock Wood Strategic Sites Addendum includes many critical plans, but they are of a poor resolution/some illegible TWBC has had very limited engagement with PWTC since the Local Plan Hearings commenced. The 'Strategic Sites Working Group' (SSWG) (key to collaboration/cooperation for masterplanning of PW) has ceased to exist. Any meetings (of a limited number) have been information giving sessions rather than participative Engagement with other key stakeholders and DtC bodies (which should have helped shape the consultation proposals) not set out anywhere Lack of reference to the Paddock Wood Neighbourhood Plan - there are many relevant sections that should be acknowledged/referred to in the Local Plan <p>Duty to Cooperate (DtC)</p> <ul style="list-style-type: none"> The latest Authority Monitoring Report on the TWBC website does not detail actions TWBC has taken in relation to the DtC (as required by Town and Country Planning (Local Planning) (England) Regulations 2012 and as referred to in TWBC's Statement of Community Involvement (October 2020)) TWBC states DtC does not apply after Local Plan submission for examination. However, given proposed 'immediate review' of the Local Plan the DtC position/ activities during the post-submission period are still relevant and should be considered <p>NPPF Changes (2023)</p> <p>Two relevant key changes to NPPF 2023:</p> <ol style="list-style-type: none"> Paragraphs 60 and 61 - greater flexibility to plan for fewer or higher number of homes than the standard method Paragraph 145 - local authorities may choose to (but are not required to) review and alter Green Belt boundaries (in the event that they consider that they cannot meet housing need) during the 	<p>The Council has undertaken a full consultation on its response to the Inspectors Initial Findings letter on the Local Plan which complies with the Statement of Community Involvement. The Council has been part of the consultation process for the Paddock Wood Neighbourhood Plan, and has been engaging with them over the proposed changes to the development strategy as set out in policy STR.SS 1. The AMR sets out the council's position on Duty to Cooperate (PS_066). Annex 1 of the NPPF (19.12.23) states that for the purpose of plan making 'The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements' (para 230).</p> <p>The revised wording of STR/SS 1 includes - 13. The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be guided by the Council's Structure Plan SPD for the whole of the allocation; 14. Proposals for the piecemeal development of individual sites in the Eastern and Western Parcels that do not conform to the above requirements as a whole will not be permitted; and 15. The development to be delivered to be in accordance with a Framework Masterplan Page 73 of 87 Tunbridge Wells Borough Council Local Plan Development Strategy Topic Paper – Addendum Date of publication – January 2024 Revision: 4 Supplementary Planning Document (SPD) which will ensure reference is made to necessary equalisation of strategic infrastructure is delivered across the strategic development site.</p>

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							<p>plan- making process, where exceptional circumstances are fully evidenced and justified. Whilst the Local Plan is not 'caught' by the timing of transitional arrangements, the borough's significant constraints, its housing requirement and need to propose such strategic Green Belt releases could be reduced under the new NPPF changes.</p> <p>Garden Settlement Principles</p> <ul style="list-style-type: none"> Mechanisms to be used to secure the implementation of garden settlement principles are not explained and there is also no mention of this or associated costs in the updated viability report The Uttlesford Local Plan is used as example of unknown implementation mechanisms - Inspector had serious concerns whether true garden settlement principles/vision could be met. 	
169-3	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	14 Commitment to early review		<p>Plan Period and Proposed Early Review -Legally non-compliant/unsound: Plan period:</p> <p>NPPF and PPG - state strategic policies should be prepared for a minimum 15 year period. Proposed Plan period is 2020-2038. However, earliest Plan could be adopted is late 2024 (not meeting minimum 15 year period) and therefore should be extended by 2 years (2040). NPPF - for larger scale developments (new settlements/significant extensions to existing settlements) policies/vision should look further ahead (at least 30 years), as longer timescale for delivery more likely. As stated in previous reps, there is clearly a need for more lead in time to plan for the new strategy (will require enormous funding, due diligence, community/stakeholder engagement and joined up planning)</p> <p>Early Review:</p> <p>Unclear what is proposed as an 'early review' as a review within 5 years is already a requirement. If TWBC proposes an 'immediate review' upon adoption what makes it think more 'reasonable alternatives' will be found to help deliver development needs when the same exercise has just been undertaken and concluded not possible? New national policies will be in place upon review - could be based on different housing requirements and no need to review Green Belt</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>Undertaking further Call for Sites, and then a review of the submitted sites will be undertaken as part of the Council's commitment to an early review of the plan. This will be done in accordance with national policy in place at the time.</p>
169-4	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	4.3 Review of the allocation in light of the Inspector's initial findings		<p>Local Development Scheme (LDS) & Approach to SPDs - legally non-compliant/unsound:</p> <ul style="list-style-type: none"> Reduction in number of SPDs welcomed, but concerns about TWBC's proposed approach for the SPD and timetable 	<p>Whilst the nature of SPD production relies on public consultation, it would already benefit from a policy direction that has already been agreed through the Local Plan. Swift delivery of SPDs is not uncommon and can be twin-</p>

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							<ul style="list-style-type: none"> Notes TWBC's approach to align the timetable of PW Structure Plan SPD with Local Plan so adopted at same/similar time. However, a draft SPD should be consulted on after Local Plan is adopted so any changes resulting from the EiP, Main Modifications consultation and adoption are known If TWBC considers a draft SPD could be ready for consultation in March 2024, why does it not include details of the Masterplan and SPD within the Local Plan so they can be fully examined? Noted TWBC proposes to 'twin-track' the consultation of the PW SPD with the main modifications to the Local Plan. This will bypass due requirement of sound community engagement and consultation - ineffective and unsound approach. Therefore suggested TWBC prepares a realistic timetable for the SPD. 	tracked with later consultation on main modifications. Nevertheless, it has been accepted at the hearings that the policy itself (STR/SS1) may be modified (Appendix D) to only require a single overarching SPD, which would include the parameters for the scale, type and mix of uses permitted at each of the development parcels (aligned with each developer), and also identify strategic and site-specific infrastructure. Policy STR/SS 1 has been amended to consider how this might be brought forward.
169-7	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	10 Consideration of development strategy options		<p>Proposed Changes to the Development Strategy - Legally non-compliant/unsound:</p> <p>Local Plan is not positively prepared, not justified, not effective and inconsistent with national policy Main proposed changes to the Local Plan are to remove Tudeley Garden Village and reduce amount of housing and employment in Paddock Wood (PW) (due to inability to demonstrate suitability /deliverability and flood risk for PW) - Option 5. Despite 1,073 shortfall in housing supply TWBC has not considered what other options may be available across the borough/neighbouring authorities. Has rejected other reasonable alternatives to deliver housing in the Sustainability Appraisal and Green Belt Review. Revised Policy STR/SS1 shows the deletion of 'approximately 3,490-3,590 dwellings' but no longer sets out the overall housing requirement, instead the minimum housing requirement is set out by each of the 'Parcels'. It is unclear how TWBC has arrived at its estimates of 2,877 (lower) and 3,035 (upper) for Paddock Wood (figure 9.1 Appendix C Table 4 - Modifications Distribution of Housing Allocations) The policy does not include the housing quantum for PW town centre, but the above table states 30 dwellings. Proposed addition to Policy STR1 - to take an early review to 'further investigate ways of meeting housing needs beyond 2034' is not justified as it fails to demonstrate exhaustion of all other potential locations for housing. Why does TWBC think it will find additional housing as part of an 'early review' and what is considered an 'early review'?</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>A Green Belt Study 3 Addendum report (PS_035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD_3.77 and PS_036) has indicated that all available sites have been utilised in the plan.</p> <p>The revised Policy STR/SS 1 will be discussed at future hearing sessions to assess whether it supports delivery of the Paddock Wood and land at east Capel site. Housing numbers are separated out across the different parcels. The quantum of development has been assessed as part of the Paddock Wood Strategic Sites (Master planning) Addendum (PS_046).</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan which sets out potential delivery of 30 dwellings.</p>

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169-9	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	4 Paddock Wood strategic growth		<p>STR/SS 1 and STR/SS 2 -legally non-compliant/unsound: Introduction</p> <p>As production of the proposed modifications has been lengthy, progress has been made on applications for development to north and east of town. The growth strategy for Paddock Wood reflects these rather than opportunity to proactively shape them and implement most appropriate form/location of infrastructure. Disappointing the proposed revisions make very little (except for minor references in Sports/Leisure section), to the recently made Paddock Wood Neighbourhood Plan.</p> <p>Sports and Leisure provision</p> <p>Revised strategy for sports/leisure provision is unsatisfactory - does not reflect reality of use nor aspirations of Paddock Wood Neighbourhood Plan and no discussions with PWTC. Requested the Inspector asks TWBC to revisit the proposals to ensure they better reflect current/future needs.</p> <p>Sports and Leisure provision been scaled back and now comprises (1) intensification of existing facilities plus (2) new outdoor sports pitches in the south-western growth parcel. Aspirations made clear at EiP hearings - PWTC wants sports/leisure provision distributed around the town retaining all sports facilities to south of the railway line and new outdoor sports provision at Eastlands, north of railway line - balanced approach/distribution.</p> <p>Location of new outdoor sports to west of Paddock Wood is outside of the PWTC's administrative area in Capel parish, precluding PTWC from managing/running this facility and Capel PC does not want the responsibility. David Lock (DL) Follow-On Study does not consider the merits of Option 2 growth scenario which shows an outdoor sports hub to the north of the railway line in PWTC's favoured location. PWTC disagrees with DL's earlier reasoning for ruling this location out - flooding, landscape setting, traffic. However the revised growth strategy now includes provision for a new secondary school in this location-surely the same discounted reasons would apply, if not more. PWTC disagrees with the high level appraisal in the DL Report of existing sports facilities in PW:</p> <p>Whilst PWTC supports improvements to Putlands Leisure Centre, the proposed intensification does not take account of existing surface water problems or plans to improve the existing skate park</p> <p>Report states no existing sports provision at Memorial Park, but there are 2 tennis courts on the site at present,</p>	<p>Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Any existing land uses (such as the rugby pitch) would be re-provided within the proposed new outdoor pitch locations and with enhanced facilities than are currently enjoyed, such as dedicated changing facilities and improved pitch configuration. Enhancements to other existing sports facilities not outlined within policy STR/SS1 could be captured as part of detailed S106 discussions as part of the detailed planning app stage.</p> <p>As set out in the Strategic Sites Masterplanning Addendum (PS_046). In light of the revised overall approach to growth, changes in flood risk information, the need to provide a new secondary school, and a reduced overall capacity of the growth sites, a different approach has been adopted to maximise improvements to provision for the town. This has aimed to maintain a high level of provision for the town including improved leisure centre provision, the need for outdoor sports facilities, and improvements to existing facilities.</p> <p>A revised series of flood modelling reports have been conducted (PS_042, PS_043, and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p> <p>The Strategic Sites (Master planning) Addendum paper (PS_046) sets out how this growth could be spatially planned and integrated into the settlement through good design, being responsive to the context of each site and local distinctiveness, and also ensuring the appropriate transport and sustainable links are provided.</p> <p>The SLP policy for Paddock Wood town centre STR/SS 2 is not subject to significant</p>

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							<p>Insulators Football team is based here, and cricket wicket is being reinstated. Community centre has also increased use of the Memorial Field for informal sports use.</p> <p>Green Lane is identified as an opportunity for intensified sports provision given current lack of use - however Green Lane football team are to be reinstated here (could impact quantum of space for new sports facilities)</p> <p>No mention of Elm Tree sports pitches (home to largest club in PW), no room for expansion and limited access and lack of parking.</p> <p>No real testing/rationale, assessment of different options or discussion with PWTC for location of school or the sports hub. The assessment and proposed solutions to be flawed. Strategy cannot be considered robust.</p> <p>Layout and structure</p> <p>Flood modelling and amendments to proposed scale and location of growth are welcome, but distribution of growth needs to be properly considered</p> <p>Proposal envisages archipelagos of development responding to flood risk but does not consider creation of sense of place and sustainable forms of development. Size and lack of connectivity will:</p> <p>not encourage/support sustainable travel modes have negative impacts on social inclusion, health and wellbeing be unlikely to generate need/demand to support provision of a local centre</p> <p>Development alongside the A228/Maidstone Road conflicts with initial Strategic Sites Masterplan report - 'need for a strong edge to the revised Green Belt boundary'</p> <p>No evidence of assessments for revised growth scenario and alignment with good place making and garden city principles. No testing of structure of development within each development parcel beyond their relationship with areas of flood risk. Strategy cannot be considered robust nor justified</p> <p>Town Centre</p> <p>Lack of attention to town centre in Masterplanning work and no SPD - concern town centre is being overlooked and focus is solely on urban extensions to town. Town centre requires significant investment in order to cope and serve growth and be used as a means for 'placemaking'</p>	<p>modification as part of the Councils response to the Inspectors Initial Findings on the Local Plan. This policy will support the revitalization of the Town Centre and encouraging the re-use of vacant units for a mix of uses. This is further aided by the level of growth for the settlement together with sustainable links to the Town Centre to support a vibrant and enhanced Settlement centre.</p> <p>The Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS_061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix II Table 2 compared with the previous equivalent results table' and that there is no change to viability overall</p>

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							<p>Ideas and solutions to improve walking and cycling conditions welcome, but needs to be balanced with needs of all (e.g. restricting vehicular traffic from Maidstone railway bridge would have wider impacts on emergency vehicles, the mobility impaired etc.) and could increase severance between communities</p> <p>Reference to Design Review for masterplanning is welcomed but questioned how effective this will be given parameters are already set in the David Lock study. Design Review process should happen now as part of testing the growth scenarios</p> <p>Viability Masterplanning work relies heavily on payment of infrastructure for flood mitigation, education, Colts Hill bypass, sports facilities etc. being shared equally over all the development sites by all the developers. The evidence uses quite a blunt instrument for testing development viability and does not capture the complexity of the strategic development. Questioned what mechanism will be used for achieving overall coordination and delivery.</p>	
169-10	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	6 Infrastructure		<p>Infrastructure -legally non-compliant/unsound: General</p> <p>Concern - omission of an updated Infrastructure Delivery Plan (IDP), originally published alongside SLP as a 'live' document. Therefore no evidence of what infrastructure is to be delivered/how funded/timing. No recognition of infrastructure promised previously through recent developments such as primary school (Green Lane), Badsell Road/Mascalls Court Road junction improvement, improvements to GP surgery. Also police station removed - increased levels of crime and anti-social behaviour Paddock Wood Strategic Sites Addendum (2023), Infrastructure Schedule (Table 8) -infrastructure/delivery information severely limited - only states project name, whether on/off site or short/medium/long term. Not clear what this means.</p> <p>Wastewater</p> <p>Sewage Works Upgrade - no confidence TWBC understands what is actually involved or how much development needed in delivering this. Existing sewage issues explained in detail at EiP but no detail in TWBC's evidence how this matter will be addressed. The viability appraisal of £230k for this upgrade seems inadequate. Due to omission of specific wastewater infrastructure requirements within IDP and Masterplanning work, not possible to cross-reference viability testing outputs - could result in several inaccuracies and implications for overall viability of scheme.</p>	<p>Appropriate levels of Infrastructure provision have been factored into the policy STR/SS 1 following on from work with Masterplanning Consultant (DLA) (PS_046) including a high level of sport and leisure facilities to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)' as set out in the DSTPA (PS_054).</p> <p>Table 8 of the above document sets out the Infrastructure Schedule for the Strategic Sites. Discussions are ongoing regarding the revised viability appraisal work, however delivery of the infrastructure is considered achievable.</p> <p>Southern Water have been engaged throughout the preparation of the SLP and as part of these ongoing discussions. Capacity is available at the Sewage Water Treatment Works (WWTW) in Paddock Wood to accommodate the necessary growth, and TWBC have safeguarded land adjacent to the WWTW should it be required as part of the revised masterplanning in STR/SS 1, and includes 'provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement' for the north-western and western parcels of land.</p>

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Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>No land available for expanding the existing wastewater treatment works (already at full capacity)</p> <p>Colts Hill Bypass How has cost of delivering Colts Hill Bypass gone from £30 million in the previous IDP / Viability Study to £5.8 million in the updated Viability Study? - serious concerns about TWBC's intentions for Colts Hill Bypass and ability of funding and delivery Health Provision</p> <p>David Lock Masterplanning study (Infrastructure Schedule) states there will be an off site 'Primary Care contribution' in the short/medium/long term. Also a 'New health centre facility' located off site in the long term. However, concerning there is no identification of land for a 'new health centre facility' and no explanation of health provision proposals (when there is clearly a need for significant improvements in PW). Current 3 developments in PW relied on Brenchley GP surgery (4 miles away) taking excess demand, but now closed to new patients from PW. No capacity at PW Woodlands Surgery. Nearby East Peckham surgery (Maidstone) now closed down.</p> <p>Cemeteries Previous concerns raised about need for additional 3 acres of land for cemetery space for additional PW population, which cannot be located on land susceptible to flooding. This issue is not addressed. Transport -congestion in Paddock Wood</p> <p>Work on modal shift/move towards sustainable transport fails to consider lack of employment and reduction in public transport for PW. Car reliance will continue affecting air pollution at peak times. No reference to this in Plan. PWTC has raised previous concerns about congestion in PW town centres but not adequately addressed in Plan. Improvements to B2160 (Maidstone Road) in previous IDP noted as well as key junctions and roundabout proposals in David Lock Masterplanning work. However, widening at junction of B2160 and Lucks Lane is no longer identified - if correct, is there a reason for this? Above infrastructure projects will not alleviate congestion on B2160, as focussed on users of private vehicles residing in the proposed urban extensions to access centre of PW. Maidstone Road is narrow and narrows into a single carriageway in places. Access in/out of town centre at A228 Whetsted Road/A228 Branbridges Road/B2160 Maidstone Road junction a particular concern, as the Transport Assessment indicates this junction will be 104% overcapacity</p>	<p>The Council has reviewed the deliverability of STR/SS 1 and consulted on this work. An addendum to the Local plan Viability Assessment has been undertaken (PS 061 plus appendices i, ii, and iii). The addendum sets out that 'overall, very similar to those presented in the 2021 Stage 2 VA work in respect of 'Paddock Wood' – current Appendix II Table 2 compared with the previous equivalent results table' and that there is no change to viability overall. £7.25M has been factored into the Colts Hill bypass and includes funds already secured through KCC Highways for development that has been progressed at Paddock Wood.</p> <p>Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS 047, PS 048, and PS 049) has been published as part of the stage of the examination, and includes a modal shift strategy including a Bus Feasibility Study (PS 058).</p>

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							<p>Not clear what is meant by short/medium/long term, what funding/costs are or what trigger points are for delivery, of each improvement</p> <p>Flood Risk</p> <p>Budget for addressing flood risk issues appear to be inadequate. Strategic development is still planned in an area very prone to flooding. Funding gap of £338,025 (previous IDP £ 9 million, now £8,661,975 and only £850K for SuDS).</p> <p>Viability Noted "Discussions are ongoing with consultants Dixon Searle regarding the revised viability appraisal work, however delivery of the infrastructure associated with PWeC as set out in the David Lock Associates addendum paper is considered achievable" Given lack of infrastructure detail in David Lock addendum paper, concerned revised viability work is relying on that report to assess the viability of the Local Plan. No explanation in Development Strategy Topic Paper about assumptions/findings of the revised viability Report Revised viability report - unclear what assumptions have remained or changed in the viability assessment from the previous strategy to the new strategy Viability Assessment Addendum now includes added cost for biodiversity net gain (BNG). However, BNG is not mentioned in David Lock work, policy or addressed in the evidence base</p>	
169-11	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	4.4 Flood risk and Housing		<p>Flood Risk - legally non-compliant/unsound:</p> <ul style="list-style-type: none"> • Despite Inspector/TWBC agreeing Paddock Wood is a "logical choice for growth" strategy for PW was flawed and non compliant with NPPF regarding flood risk. • PWTC has raised strong concerns/objections at Regulation 18, Regulation 19 and throughout the Examination about inadequate evidence and assessment of flood risk; and not addressed. • Pleaded sequential test has been raised by the Inspector and the flood mapping / modelling has been updated to better reflect the experience of those living in PW • However, very difficult to compare new flood risk evidence with the updated Strategic Sites Masterplanning - no overlay of flood zones and unable to see how proposed development and Flood Zones 2 and 3 relate. Resolution of plans also poor e.g. Figure 4 - unable to see flood zone shown. • Gravelly Stream - causes serious concerns as it floods many properties located next to it. Also accepts diverted water from Tudeley Brook (FOG) 	A revised series of flood modelling reports have been conducted (PS_042 , PS_043 , and PS_044) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.

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							<p>which then affects capacity of culvert under railway and when full, floods properties in Ribston Gardens, Laxton Gardens etc. Barrier is needed between stream and residential areas.</p> <ul style="list-style-type: none"> • Rhoden Stream - New development at Queen Street presents serious issues for PW and the Rhoden Stream - new sewage works will deposit a minimum of 50,000 litres a day into it. Water from recent developments at Green Lane and Church Road also overflow into this stream. Can only take so much water and have been no upgrades to the stream, its culverts or ditches. • Flood Zones 2 and 3 map are used as a rigid development boundary - very simplistic approach that could have dire consequences for future owner/occupiers of the proposed development. • Unclear how future development will impact on flooding in the area as mapping is based on current landform and existing rather than future development including new roads and less permeable land. • Stated surface water attenuation measures will be located within the development parcels, however, Figure 5 shows SUDS measures outside of these. • Not clear what the flood management measures south of the railway line and improved pedestrian crossing in Figure 5 actually are. • “Betterment” was promised on 3 strategic sites now under construction - however the sewage system has been over burdened and regularly overflows. Surface water flooding also worse. Apparent that functional dam provided by railway line and its (mainly) blocked culverts are an insurmountable barrier to any potential flooding improvement works. Nothing agreed by Network Rail • Swatlands Employment Site approved before Local Plan is adopted - however, new flood risk evidence indicates it might not have been approved had TWBC followed the evidence and NPPF requirements. • TWBC ‘blurs together’ wastewater, freshwater infrastructure and surface water that causes flooding with no understanding of the difference between these very different and very critical issues for PW. 	
169-12	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	Summary of findings (Green Belt)		<p>Green Belt -Legally non-compliant/unsound:</p> <p>Stage 3 Green Belt Addendum Report, difficult to follow TWBC has not approached the Inspector's points regarding the need to fully evidence 'exceptional</p>	<p>A Green Belt Study 3 Addendum report (PS_035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD_3.77 and PS_036) has indicated that all available sites have been utilised in the plan.</p>

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							<p>circumstances' with an open mind, keeping much of the original development strategy intact.</p> <p>TWBC is not actively looking to meet its development shortfall as a result of its revised development strategy. Otherwise why is it mentioned that sites could be reconsidered for potential allocation but as part of a Local Plan review? Surely now is the time to consider sites that could help ensure the soundness of the Plan.</p> <p>There are many sites/alternatives not proposed for allocation in the Plan, that have the same/lower harm ratings than STR/SS1, with no clear reason for not allocating them.</p>	
173-5		Hadlow Estate	Tom Ashley		4.6 Education infrastructure provision	<p>2 TGV – Making the Plan Sound</p> <p><u>2.1 Secondary School Strategy</u></p> <p>As highlighted above, neither of the two options proposed by the Council resolve the requirement to provide sufficient secondary school places in support of the revised development strategy. The inclusion of TGV allows for the provision of a new secondary school site, with certainty that the school will be in the correct location to support growth and will be fully funded over the long term.</p>	<p>The Hadlow Estate consider that the proposed changes to the Local Plan are neither legally compliant or sound in regard to the revised development strategy -Secondary School Strategy and make the following points;</p> <ul style="list-style-type: none"> • TWBC acknowledge that a strategy for the provision of secondary school capacity has not been finalised as part of the revised strategy, but rather options have been presented at this stage. This approach is considered to be unsound as a result of the deletion of TGV. • With the revised scale of growth, there is still a requirement to provide additional secondary school provision and options are expansion of Mascalls School or provision of new 4FE to the north west of PW. It is noted that there is not yet support from the Local Education Authority for the expansion of Mascalls and that there are a number of issues in regard to this option. In regard to the second option, there is uncertainty around the funding for a new 4 FE school and whether it is viable over the longer term. • Considerable uncertainty over secondary school provision as a result of the amended strategy which could be overcome through the inclusion of TGV, or the consideration of expansion of PW as part of the overall strategy with TGV. 	<p>The revised policy STR/SS 1 secures land safeguarded for a secondary school whilst acknowledging that secondary school provision could also be accommodated at Mascalls Academy. A feasibility study is currently underway to assess the Mascalls site and the potential to accommodate the additional pupils. This feasibility will assess the points raised by KCC who have been central to agreeing the brief for the feasibility work.</p>
174-1	Malcolm Dorrington				15 Proposed strategic policy revisions		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-2	Malcolm Dorrington				Other Matters		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-3	Malcolm Dorrington				14 Commitment to early review		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175

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174-6	Malcolm Dorrington				10 Consideration of development strategy options		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-8	Malcolm Dorrington				4 Paddock Wood strategic growth		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-9	Malcolm Dorrington				6 Infrastructure		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-10	Malcolm Dorrington				4.4 Flood risk and Housing		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
174-11	Malcolm Dorrington				Summary of findings (Green Belt)		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	Response noted. TWBC response as above 169 - 175
178-1		Environment Agency			4.4 Flood risk and Housing		No objection to requiring all residential development to be within Flood Zone 1 and employment development within Flood Zone 2.	This is noted.
179-1	Anthony Batchelder	Paddock Wood Athletic Club			4.7 Sports and Leisure provision		Paddock Wood sport and leisure provision - legally compliant and sound Supports the modifications to the Plan and investment in existing sports infrastructure.	This is noted.
180-1	Sean McQuillan				12 Conclusions on preferred development strategy option	My Representation to this consultation can be summarised by stating that I wholeheartedly agree with the Representation made by Save Capel under Regulation 19, Final Version dated Monday, 26 February 2024.	Supports the representation to this consultation made by Save Capel.	This is noted.
180-2	Sean McQuillan				4.7 Sports and Leisure provision	TWBC is proposing to invest in the development of existing sports facilities within Paddock Wood. The revised Section 8.11 of the Sports and Recreation section of the TWBC plan	Paddock Wood sports and leisure provision - legally compliant and sound. Putlands needs to be extended to a full 6 lane track to maximise the opportunities and benefits for residents.	Proposals to provide upgraded facilities to the existing sports at Putlands, would seek to deliver significant enhancements to the overall provision and in a central position within the community. Specific enhancements at Putlands would be set out as part of detailed design works but this could include upgrade/expansion of the existing running track.

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						<p>includes this statement when referring to the track <i>“Although an excellent local asset, and the only synthetic track in the Borough, it is limited by not having six lane all round. Future development of the track with club house provision at Putlands Leisure Centre creates the opportunity for this to become the athletics hub and centre of excellence for the Borough.”</i></p> <p>It is my view that the running track at Putlands in Paddock Wood urgently needs to be extended to a full 6 lane track in order to maximise the opportunities for residents of the town and local area and to continue to contribute to the health and wellbeing of its residents. It is an ideal candidate for borough funding and the use of section 106 funds.</p>		
184-2	Cllr Kim Fletcher	Cranbrook and Sissinghurst Parish Council			4.6 Education infrastructure provision		<p>All options for non-selective education in the High Weald are over-subscribed or have shut entry to children of Cranbrook and Sissinghurst. Local children have to travel over 10 miles to get to school.</p> <p>A new in Cranbrook or nearby should be included in the Local Plan. Having to catch a 7am bus to Mascalls and return home at 4pm affects the pupils experience, causes social issues and limits opportunities for the children.</p> <p>Hawkhurst, Staplehurst, Biddenden, Headcorn, Marden are all other centres of population that have substantial new housing. The developers pay contributions to KCC for</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128). As part of this, TWBC have engaged with KCC (as Education Authority) regarding the necessary school infrastructure requirements and new secondary provision for the Cranbrook region has not been raised. Due to the scale of the proposed Strategic Sites at Paddock Wood and East Capel, new secondary provision is required and The Strategic Sites (Master planning) Addendum paper (PS 046) discusses at para 3.2 that a 3FE secondary</p>

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							<p>education provision of around £7000 per house. A new school may cost £10m, so 1430 houses would build a new school. The High Weald has already delivered this many houses.</p> <p>The obvious answer would be a school alongside Snowfields on land under the control of Leigh Academy Trust. It does not have to be in Cranbrook, but KCC own a field adjacent to the primary school, that is large enough to take a 650 pupil school.</p>	<p>requirement would be generated by the proposed Strategic Growth at PWeC. The document then sets out the options for this being delivered.</p>
184-3	Cllr Kim Fletcher	Cranbrook and Sissinghurst Parish Council			5 Transport related matters		<p>There is no mention of travel from the east of the borough by bus, nor the delays caused by congestion on the A262 in Goudhurst, the A21 at Lamberhurst and at Kippings Cross.</p> <p>For example, it currently takes over an hour to get from Cranbrook to Mascalls Academy in the morning so the bus leaves at 7am.</p>	<p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128). As part of this, TWBC have engaged with KCC (as Education Authority) regarding the necessary school infrastructure requirements and new secondary provision for the Cranbrook region has not been raised. Due to the scale of the proposed Strategic Sites at Paddock Wood and East Capel, new secondary provision is required and The Strategic Sites (Master planning) Addendum paper (PS_046) discusses at para 3.2 that a 3FE secondary requirement would be generated by the proposed Strategic Growth at PWeC. The document then sets out the options for this being delivered.</p>