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To: [Local Plan \(TWBC\)](#)
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Subject: Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal
Date: 22 February 2024 19:03:20

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Dear TWBC Planning

Revision of the strategic policy STR/SS 1

Local Plan Development Strategy Topic Paper - Addendum

4 Paddock Wood Strategic Growth

4.1-4.5 The Inspector's findings that revisit the growth strategy and implementation for Paddock Wood (PW) set out the reduction in housing allocation to 3500 dwellings and employment land. This is welcomed although the scale is astonishing for a small town with NO associated infrastructure improvements.

In the **Summary of Proposed Modifications to the Development Strategy, following Inspector's Initial Findings Letter** the developments permitted under the 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. I note that it also allows - *Includes an allowance for potential delays or non-delivery of sites;*

Section 5: Strategic Sites: Tudeley Village and Paddock Wood, including land in east Capel - The revised wording is much less specific about what infrastructure is planned compared to the previous iteration, and it is not clear to residents how the town will be made better through the rolling programme of development, not just the planned development covered in this plan. The effect is cumulative. 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 rather than the current hotch potch. The commitment to brownfield sites needs further consultation as it can lead to a large development in terms of population being approved however I would estimate that something like 200 brownfield infills have been approved by the Council which is sizeable but does not attract Section 106 funding.

In addition I am 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. Item 4.8 states that the council has agreed a development plan that is consistent with development plans of the town council in PW be clearly this is not the case (see PWTC response to consultation on their website). 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.

The entire plan to deliver increased housing to Paddock Wood must surely be considered in terms of

need. The 30 new houses / flats already built in Paddock Wood town centre are remaining empty bar some of the Churchill Retirement complex - which puts additional strain on medical services. To enable these small developments, this has required the demolition of existing premises i.e. Chinese restaurant; fish and chip shop; hairdressing salon; flower shop and police station to be replaced by residential properties that seem to not be selling. There are still a number of houses to be built in the existing developments many of which are being sold outside of the "local area" including London Boroughs and being actively marketed abroad. No mention is made of the impact to hedgerows and displaced wildlife. Why are the council continuing with the bulldozer to the countryside policy when government policy is to look at brownfield sites. Some of the hedgerows in Paddock Wood are in excess of 100 years old with mature trees and other hedgerow wild life.

Structure and Infrastructure:

As highlighted in the report S6.6. Paddock Wood town centre is not part of the Paddock Wood Structure Plan and there is significant concern, therefore, that this is being overlooked and TWBC are solely focusing on developments around the town without the required investment in order to manage the growth of the area. This means the present facilities are expected to cope with the additional homes proposed. Aside from the lack of basic amenities, without improvement this creates dormitory settlements with associated traffic issues. 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. 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.

Due to the proposal to build on Flood Zone 1 areas due to the flooding issues in and around Paddock Wood, the proposed growth strategy for the town is ill-conceived. It leads to a fractured series of development areas with many of them having a disconnect from the Town Centre. This leads to isolation of residents, a negative impact on social inclusion, poor access to facilities and increased cars on the roads. Our local plan recommends expansion based on garden settlement principles and for developments to be fully integrated within the existing town and clearly this has not been considered.

There has been very little consideration given to the detail of what is actually required - simply stating "Utilities", or "sewage works upgrade" with no detail as to what is required, whether there are short, medium or long term plans being considered. There is no land available for expanding the waste water treatment works and the existing treatment plan is already running at full capacity. The Viability appraisal assumes £230K for this upgrade which seems inadequate. PWTC has confirmation from Southern Water even before the current proposals that the treatment works were already at capacity confirming what is stated above.

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

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

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

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

The proposed future housing should be halted until an agreed working infrastructure is in place.

Transport:

The Borough Council are working on a plan which includes sustainable transport but they have failed to consider the lack of employment opportunities in Paddock Wood coupled with the poor public transport facilities (it comments that services are good!). An increase in population will lead to a significant increase in traffic in an area that already has high air pollution during rush hour. The plans for the road improvements are vague with no clear indication of what is meant by short, medium or long term and they fail to address the congestion that will occur on the B2160 "Maidstone Road". Access in and out of the town centre is also an issue particularly as some of these junctions are already over capacity. The planned road changes at the Badsell Road / Maidstone Road junction has been promised for some years and was originally due to be completed before the Badsell Road development was started. The work on this junction has still not commenced and we understand the planned start date of June this year has been put on hold due to flooding issues in that area.

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

- at peak times there are traffic jams from Matfield to join A21 – which will become worse.
- How is Colts Hill (already at capacity) to cope with additional Paddock Wood traffic?
- As a requirement to develop Kings Hill a single funnel system was designed to ensure additional traffic entered and left through the improved by-pass so reducing the impact to surrounding villages. Why is this is not the case for Paddock Wood.

There is a strong lean towards improving walking and cycling conditions but this appears to be to the detriment of vehicular access.

The plan to make the Maidstone Road Railway Bridge one-way would simply lead to an increase in traffic elsewhere, people making longer journeys in their cars and vehicles. Medical services are located over the bridge. The bridge has been closed for roadworks and gas works this week and has led to queuing at Badsell Road roundabout and congestion on Church Road (towards Waitrose).

The current new developments have caused significant increased use of the lanes north of Paddock Wood (Lucks Lane, Queen Street and Wagon Lane) as rat runs. This is evidenced by the condition of the verges. It is now dangerous to walk at peak times on these single track roads – a problem which will only become worse with additional building (and the Swatlands development). Home owners are becoming trapped in their own homes! This is a contradiction of green lanes policy. Why should existing residents have to suffer increased noise danger and damage to their homes (old homes, historic properties without foundations) risk structural issues as a result of this. The property September Cottage shakes when lorries pass by. Traffic speeds are excessive and lorries pay no heed to the access restriction signs. Lucks and Wagon Lanes are single track with hair-pin bends. It is only a matter of time before there will be fatalities. Why aren't lessons being learnt from what has happened in Dundale Road. The improvement of the A228 will further contribute to the funnelling of traffic.

Overview and Conclusions -

4.62 Good range of existing services - employment, services and public transport options based on what assessment? The development has been started before the Local Plan, the Town Council

Neighbourhood Plan is very clear. Some services are overwhelmed or nearly at that point without the new development outlined in the plan. Infrastructure needs to be central before any new housing to promote growth. Infrastructure needs are clearly laid out in the PWTC response which has been sent separately

4.63 We do not agree with this, and any revised policy should be after much more contact with PW groups, sports clubs, residents and other interested groups.

Traffic restrictions from the new developments which prevent using Queen Street – funnelling traffic directly to the Badsell Road.

Dualling of A228 to Hop Farm roundabout.

Blocking up Lucks and Wagon Lanes and/or speed bumps and maximum width bollards.

Blocking up Queen Street and Willow Lane railway bridges to all but emergency vehicles and bicycles.

Other Points

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

Health:

There is an indication that there will be an off-site primary care provision in the short to medium term but that a new Health Centre facility will be located off site in the long term.

There is no indication of land being put aside for that facility and there is significant concern amongst residents of the ability of many of them to use an off-site facility due to lack of access etc. The current three developments relied on the GP surgery in Brenchley which is now closed to new patients from Paddock Wood.

The only medical centre in PW is Woodlands Health Centre which has also closed to new patients (see Woodlands website) and East Peckham surgery closed last year. This leaves new residents without access to a GP surgery which will, in turn, lead to a significant increase in attendances at the local Emergency Departments, the walk in provision at Sevenoaks Hospital, both of which are already overwhelmed.

In December 2023 a patient survey confirmed that waiting times at Woodlands are currently long. The Government telephone triage system was introduced to try and alleviate this. Residents, particularly older ones find this and online access to care pathways difficult. This is despite Woodlands having one of the highest uptakes of online digital pathways for care in the Local Primary Care Network. Only 35% of appointments were face to face with a GP in December 2023 (according to the Patient Participation Group) - often after an initial telephone call appointment. Government statistics often say a higher figure but this is an appointment at the GP practice eg with a clinical pharmacist etc

An influx of new babies in the area (mostly from existing new developments) are now seen by GPs as the district and midwifery services have been cut since 2010, and this is a 30 minute examination taking up more GP time and making waiting times longer..

The focus on providing for the older people of PW is helpful but many are reluctant or unable to use the new digital appointment system or apps supported by the NHS. The phone/in person/digital triage system is too complex for many older people with little support for digital access in the community. If Woodlands is closed to new patients, this seems to be at odds with the assessment that there is capacity

there, and it is certainly not the lived experience of residents. Our one Pharmacy in PW has long queues and is reluctant to expand. The Local Plan with additional development will impact on this considerably and should be part of any discussions or S106 funding. The current S106 funding for a Health Centre after the existing developments were given the ok has meant that Badsell Road improvements were engineered out, and health centre capacity underestimated. Expansion of Woodlands was agreed but has been slow in delivery - another example of lagging between rushing houses up and then the infrastructure coming on behind - if at all.

There is no provision for additional cemetery space in Paddock Wood. It is believed that a further 3 acres of land is required to provide for the additional population. Cemeteries are not allowed to be located on land that is susceptible to flooding and if all the developments are built on the Flood Plain 1 areas that will leave no space for additional cemeteries.

Flooding: 4.17- 4.29

The Borough Council's strategy for Paddock Wood is completely flawed and not compliant with the National Planning Policy Framework regarding flood risk. The response in points 4.17-4.29 I have real concerns that this failure to apply the NPPF requirements proves it is not able to deliver a safe and sensible development strategy. 4.17 rightly mentions climate change as requirement for planning.

There is significant flooding in Paddock Wood, for example Gravelly Stream along the western side. This accepts diverted water from the Tudeley Brook Stream in Five Oak Green which fills the culvert under the railway and then floods areas around Ribston Gardens and Laxton Gardens and up towards Badsell Road. Paddock Wood is therefore already suffering flooding from streams located in Capel Parish. There is no consideration of this issue in the plan as far as I can see?

The proposed new development at Queen Street by Redrow/Persimmon (S12.10) plans to develop a new sewage works which will deposit at minimum of 50,000 litres a day into the Rhoden Stream (S12.15 and S12.16). This leads to issues with the culvert under the railway line (East Rhoden Stream) as it has insufficient capacity and if this is improved just pushes the problem onto Queen Street and down stream properties and villages. There is no mention of realistic solutions to deal with this – even before the 37% increase of rainwater mentioned elsewhere. This stream already has increased flow due to the Green Lane and Church Road developments and serious flooding will occur if this level of increase is allowed. The council response has taken account of modelling for floods but the cumulative effect not just of the developments in the plan but also the existing and current developments affect this modelling.

The Borough Council seem to consider wastewater, freshwater and surface water as one issue which shows a complete lack of understanding of the serious flooding issues Paddock Wood is suffering at this moment.

All of the above is already causing issues, due to the high water table on the new housing sites in Paddock Wood, they are already experiencing damp problems which seems to show building control are not doing their job correctly. People are buying these properties in good faith only to end up with serious building defects in years to come. With further flooding and building of houses on flood plain land this will eventually create problems with houses being insured, as is already the case in my road, much of which will be directly affected by the new flood data.

There is no mention of how existing Zone 3 properties South of the railway and North – Lucks and Wagon Lane plus Queen Street flood risk will mitigated. TWBC proposals do not take into enough significant account of the 37% additional rainfall from Brenchley, Matfield and development either, singling out a model for Paddock Wood which is only half the picture on the ground. Without further development there are already known sewage problems in Paddock Wood and Queen Street which have issues of sewage coming into homes and at times of high rainfall drains overflowing and not being able to flush toilets. Sewage water frequently sprays from the plant at the Lucks Lane plant near Queen Street as far as the bottom of September Cottage. If it is impossible to increase sewage capacity (s11.4 – S11.6) and already services are stretched how can further development be considered?

The response from TWBC states it has modelled Paddock Wood and that there is the 37% increase in expected rainfall brought about by global warming. It says "some greater differences elsewhere across Paddock Wood and so in order to robustly outline the extent of development which could be delivered through the Strategic Sites" 4.22 but it is not clear if they have taken into account the impact this will have on the existing infrastructure never mind new homes. No mention has been made of the rainwater run off from Brenchley and Matfield and its effect to Paddock Wood and developments down stream.

This report shows a blatant lack of understanding, at best, of the issues Paddock Wood faces in regards to flooding and there are serious concerns that the infrastructure has not been put in place prior to the building of all these extra houses which will cause problems with effluent management and further flooding. 4.27 mentions in the vaguest planning terms the use of attenuation pools that might be included within the proposed sites - it should be a stipulation if this attenuation is indeed needed (it will) "some greater differences elsewhere across Paddock Wood and so in order to robustly outline the extent of development which could be delivered through the Strategic Sites" - **that's a could without further detail of what is envisaged or residents can expect with any certainty given the track record of under delivery of promised betterments.**

Sports and Leisure

4.58 acknowledges a comprehensive review of sport and leisure facilities. 4.55 indicates clearly a need for a sports hub. However then is contradicted in 4.56 maximising housing growth without any guaranteed infrastructure. A proportionate reduction is outlined with a suggestion to have a dedicated 'sports hub' - past tense description

The list on the link to this is specific 6.43 - [Strategic Sits Masterplanning and Infrastructure Study Feb 2021]

For example, an indoor and outdoor sports hub, swimming pool, as well as new sports pitches and improvements to existing facilities. The cost of providing all these items was a contributing factor in the baseline assessment that Paddock Wood and east Capel, and Paddock Wood/Tudeley Village scenarios were unviable. Therefore, it was necessary to consider alternative, more affordable options for the delivery of sports facilities despite the loss of potential social benefits to providing both new and improvements to existing infrastructure.

6.44 is supportive of the sports hub which is popular as an idea with residents, in a phased development - (Table 9 assumptions - based on successful experience)

TWBC are instead suggesting that they appraise our existing sports facilities. However we believe this piecemeal approach is very short sighted and does not account for the potential future growth of Paddock Wood. They have also failed to understand the facilities available currently in Paddock Wood. 4.59 the facilities revised to support the housing and employment growth does seem to put residents last in the plan. This is clearly inadequate. No consultations with residents or local sports clubs has taken place to my knowledge. The original structure plan had a much bigger vision, and the 4.61 suggestion does not make clear which of the many football pitches the improvement could be made to, nor have the football clubs had any consultation with the Council.

- "Improvements" to our sports club Putlands, would include the removal of the rugby pitch for further car parking, There is significant flooding at the bottom of that field and concerting over a huge section of it will lead to further issues in that area.
- The Town Council are already planning to improve the skate park.
- They have failed to recognise the sports facilities at the Memorial field
- They identify Green Lane as a site for intensified sports provision due to lack of use but there are

plans to reinstate the Green Lane Football team and this hasn't been taken into account.

- They have failed to recognise the Elm Tree sports pitches which is home to the largest sports club in Paddock Wood but has limitations for parking and access.

4.59 and 4.60 are therefore not really adequate in terms of review and sufficiently detailed to ensure delivery.

This all needs considering as part of a robust sports strategy for Paddock Wood rather than individual bits of improvement.

Education and Childcare: 4.36-4.52

Education infrastructure provision is vital to the developing town of PW. Population changes since the Fowlhurst Wood development and others has brought younger families into the town (please see points about babies and health care)

The revised growth scenario, (PWeC) means a new sequential development plan is needed. The number of dwellings proposed in 4.37 (2500). In his report (Point 4.10) the inspector has suggested education should be given further consideration. Following cancellation of the planned developments at Tudeley and the plan for a secondary school there, the need for increased secondary provision remains, although at a lower level. Now provision for 3 Forms of Entry (FE) for around 900 new pupils is expected to be needed:

It is proposed that this be in Paddock Wood.

4.37 of the Council response suggests a further expansion of the Mascalls Academy to 8 forms of entry. There is a question mark as to whether Mascalls would be able to take the increased capacity. KCC have reservations but feel it could be expanded to take the extra. This would however make Mascalls one of the largest in the county (4.42) the site may be suitable but the learning experience in a 12 form of entry school - which would add to Year 7 initially but could then have structural and organisational issues as they progress through the school. Given the current recruitment issues with teachers, the many advertisements for vacancies (including Mascalls) any expansion of places must be matched by a guarantee from LAT to cater with appropriate specialist teachers and rooms to ensure a quality educational experience. 270 PAN. There has been no obvious consultation about staffing numbers, turn over and effective use of space, to meet a school population of 3000+ without further development of this school site. 4.38 assessment of secondary provision in conjunction with Kent County Council assumes rising demand would be met by expansion of Mascalls. Assessment between TWBC and KCC about another extension to Mascalls following the amalgamation of a closing school in Cranbrook means the Multi Academy Trust Leigh Academies would be offering only one education option for the residents and children of Paddock Wood. 4.38 takes of not all pupils going to the additionally created spaces but the response suggest the majority of need is assumed - this does not give parents choice as local bus services are not reliable or frequent. It does not reflect the educational sites offered in neighbouring sites in Tonbridge, Cranbrook or Tunbridge Wells which are constantly oversubscribed. There is no evidence of any consolation with other schools or Trusts in 4.40 4.41 points to the complex system in West Kent, The education department in KCC should not be the only consultation outlet, as there are reducing numbers of schools under LA control - including Mascalls. Places are more than just numbers to residents of Paddock Wood, and this section of the response seeks to make the numbers add up rather than genuinely offering PW choice in its education provision. 4.43 KCC have already been in consultation with LAT and the mention of LAT wanting to sell off land to modernise the Academy, is worrying. My experience as parent when my child was at Mascalls was frequent staff turnover, inadequate coverage of lessons by specialist teachers, and high educational outcomes. Being able to recruit and keep teachers is almost more important than use of additional land.

The Borough must future proof this in any new proposal. 4.44 states how important practicalities of expansion are. This point highlights the preference of some of these issues. I have highlighted educational concerns, in addition to the impact on the school eg parking, traffic and bus movements now the road to Matfield is not being improved. Using S106 money to enable this expansion would

surely require a value for money and value for educational aspirations to be undertaken. There was already provision for an extension in the development in East PW for Mascalls - has this been included in the assessment - it's not clear. Other suggestions to accommodate 3 form entry are not covered by the Council. Mascalls is at the centre of the point 4.45, with a 2FE being accommodated elsewhere - without any formal agreements being outlined in initial assessment by KCC or TWBC.

4.46 Is this response also based on KCC assessment? The OfSTED dashboard rates this school in terms of academic progress below average (2022/23 data) and grade 5 in English and Maths as 33% 14% below the Kent average. Mascalls Academy is ranked average with grade 5 19% below the Kent average. Transport implications must be considered - not all attendees are local at Mascalls, and many used the rail and bus systems. There are already many pupils travelling in to PW from Cranbrook since the school there shut and its pupils subsumed into the site at PW. Roads such as the A21 are important but only one factor.

Land has been reserved in North West Paddock Wood for a new secondary school. However, KCC will only consider a new school viable if it is at least 4 Forms of Entry which is predicted to not to be the case for the foreseeable future

The plans for additional secondary provision are therefore uncertain at the same time as the Council proposes developments that are expected to lead to large increases in pupils of secondary age living in Paddock Wood. 4.47 suggests space in Tonbridge schools might be possible. Strangely KCC has not had any discussions with schools in Tonbridge - as opposed to their Draft Local Plan. The potential schools - Leigh Academy Tonbridge (Brook Street) a newly acquired school in LAT, Hugh Christie (White Cottage Road) are advised by TWBC rather than KCC - is there an explanation of this and why consultation discussions are different? KCC doesn't set the admission requirements for academies which have been revised recently so PW children could apply for places after many years of a restrictive comprehensive bias towards Mascalls from the 1970s. TWBC could seek a more adequate alternative. Educational standards at the schools in 4.47 are at best average. I would like the Borough to have higher aspirations for the children of Paddock Wood through a fair choice of provision, like neighbouring towns with a mix of schools. No consultation on this has been carried out with residents. 4.50 standalone facility is possible but there seems to be no clear route to this outcome. S106 money needs to be for a quality experience for PW children. Public consultation should be included in the feasibility study.

The plans for primary school expansion are vague. The new school that was planned has been put on hold due to insufficient numbers of children but Paddock Wood Primary School is at capacity and alternative options rely on parents having transport. It is unclear whether the site originally allocated for a second primary school is still being reserved and who would manage that school.

There is insufficient pre-school and nursery provision in the town. With only 1 nursery and 3 pre-schools available this does not provide for any increase in need. There is no consideration of this in the plan.

Crime and Antisocial Behaviour

Although not mentioned in any of the reports or responses, this is a significant concern for residents of Paddock Wood. There has been a significant increase in anti-social behaviour and vandalism recently and more worryingly there has been an increase in crimes such as assault, burglary, drug dealing and muggings. There is little or no police presence in the Town, the police station has been demolished for infill housing and the allocated money TWBC has for anti-social behaviour resolution has not been utilised. It is inconceivable that Paddock Wood can be allocated additional housing to the 1000s already allocated over the last few years without a regular police presence and support for the residents. A review of crime and prevention in PW is well overdue.

Policy SS3 - deletion of Tudeley Village - generally this is a good suggestion by the Inspector, but there needs to be a revised plan for that area to alleviate the subsequent pressures on PW for growth housing without detailed well thought out infrastructure .

Sincerely

Adrian Pitts

Adrian Pitts

