

**From:** [REDACTED]  
**To:** [Local Plan \(TWBC\)](#)  
**Subject:** Consultation on TWBC's amended local plan  
**Date:** 26 February 2024 23:35:38

---

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

**To whom it may concern.**

My name is Sue Lovell and I not only live in Paddock Wood, but I have a small social enterprise based in the town. I have many concerns regarding the amendments to the local plan. I am also a founding member of the Stop Overdevelopment of Paddock Wood collective, and I would like to add the paragraphs below as my response to the consultation.

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 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.

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 small 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 little in Paddock Wood to encourage people to spend money in the town, particularly in the evening. Barring an excellent supermarket, a couple of convenience stores, an Indian restaurant and two pubs, there is little to bring people into the Town Centre after working hours. The worrying recent increase in anti-social behaviour will also need to be addressed properly. There is a distinct lack of policing in the town.

The situation 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. This has resulted in permanently restricting retail and social space in this area, which is a huge missed opportunity that 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 hotchpotch.

In addition, we are very concerned that the TWBC revisions relating to Paddock Wood fail 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 (I should know, I was on the steering committee) which seems to have been ignored. This 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. 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 not to be selling. There are still several houses to be built in the recent large developments, many of which are being sold outside of the "local area" including London Boroughs and being actively marketed abroad. (see <https://www.midlandglobal.hk/en/properties/foal-hurst-green-2/>). No mention has been made of the impact on 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 over 100 years old with mature trees and other hedgerow wildlife. I have noticed that since the Church Farm development 'The Burrows' has been developed, many crows have been displaced to live elsewhere, including the trees at the bottom of my garden. I regularly observe bird species such as skylarks over the fields that are planned to be developed, and I despair for their fate if, for example, the Persimmon/Redrow developments go ahead. The houses at the 'Elm Tree' end of Church Road will be completely surrounded by developments. Some of these properties are grade two listed and have also been subject to flooding over the years. We are extremely worried at what might happen if these developments happen. We are also very concerned about noise and light pollution. We have been subjected to constant noise and dirty roads from construction vehicles since the Mascalls Grange development started and will be subjected to much more over the next several years as these developments go ahead.

### **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 that 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 will be 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 demonstrates 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 only 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 could lead to isolation of residents, a negative impact on social inclusion, poor access to facilities and increased cars on the roads. The Paddock Wood Neighbourhood Plan recommends expansion based on garden settlement principles and for developments to be fully integrated within the existing town and this has not been properly 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 downstream.

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.

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 look at alternatives within its own boundaries for Greenbelt reallocation.

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

### **Transport:**

The Borough Council is working on a plan which includes sustainable transport, but it has failed to consider the lack of employment opportunities in Paddock Wood, coupled with the poor public transport facilities. 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, particularly the junction with the B2017 Badsell Road. This was recently evidenced when the railway bridge was closed for works. Traffic coming in to Paddock Wood was backed-up from Dampier's corner to the aforementioned B2017/B2160 junction. This will no doubt be exacerbated by the massive expansion planned. Furthermore, the planned junction improvements at the Badsell Road/Maidstone Road junction have been promised for some years and were 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 a massively 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) going 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 thus reducing the impact on surrounding villages. Why is this not the case for Paddock Wood?

There is a strong bias stated in the plan 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, with people making longer journeys in their cars and vehicles. The current new developments have caused significantly 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). Homeowners 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), and 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 hairpin bends. It is only a matter of time before there will be fatalities.

Potential solutions that appear not to have been considered by the Borough Council are:

- 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 resources in 5 years making amendments, why not look to 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. The term 'off site' is vague - indeed in PWTC's response they make the same remarks. There is no indication of land being put aside for that facility and there is significant concern amongst the residents about the ability of many of them to use an off-site facility, due to lack of access and poor public transport. The recent three large developments have relied on the GP surgery in Brenchley, which is now closed to new patients from Paddock Wood. Woodlands in Paddock Wood has also closed to new patients 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 which are already overwhelmed.

Waiting times at Woodlands are currently long. This is despite them having the highest uptake of online digital pathways for care in the Primary Care Network. On 35% of appointments were face-to-face with a GP in December 2023 - often after an initial

telephone call appointment. Government statistics often say a higher figure but this is an appointment at the GP practice e.g. with a clinical pharmacist etc.

An influx of new babies in the area (mostly from existing new developments) are now having to be seen by GPs, as the district and midwifery services have been cut. This is a 30-minute examination, which takes up more GP time.

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.

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:**

The Borough Council's strategy for Paddock Wood is completely flawed and not compliant with the National Planning Policy Framework regarding flood risk. The residents have real concerns that this failure to apply the NPPF requirements proves it is not able to deliver a safe and sensible development strategy.

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.

The proposed new development at Queen Street by Redrow/Persimmon (S12.10) plans to develop a new sewage works which will deposit a minimum of 50,000 litres a day into the Rhoden Stream (S12.15 and S12.16). This will lead to significant issues with the culvert under the railway line (East Rhoden Stream) as it has insufficient capacity - and if this is improved, it just pushes the problem onto Queen Street and downstream properties and villages. There is no mention of realistic solutions to deal with this – even before the 37% increase in 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.

Worryingly, 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.

All of the above are 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 demonstrate that 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, both new and existing.

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 be mitigated. TWBC proposals do not take into account the 37% additional rainfall from Brenchley, Matfield and development either. Even 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?

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

TWBC's report shows a blatant lack of understanding, at best, of the issues Paddock Wood faces regarding flooding. 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.

With its amended Local Plan, TWBC is now proposing new housing only on zone 1 areas. Any extra building developments will, however, inhibit absorption of water into the soil in cases of flooding. The proposed building in these areas is therefore a bad idea for 2 main reasons:

1. Existing homes in PW are more likely to be flooded because more ground in the development areas would be concreted over, and
2. It is only a matter of time before the homes proposed to be built on zone 1 areas are later changed to zone 2 or 3 by the Environment Agency. The new homes then be at far higher risk of flooding and higher insurance premiums.

## **Sports and Leisure**

The removal of the Sports Hub from the plan is a complete disappointment and was decided with no consultation with the Town Council or residents. TWBC is 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. Most of the sites the Borough are looking to use for this are owned by Paddock Wood Town Council and the lack of advance two-way dialogue with the Town Council and existing community sports clubs has not been well received. They have also failed to understand the facilities available currently in Paddock Wood

"Improvements" to Putlands would include the removal of the rugby pitch for further car parking, There is significant flooding at the bottom of that field and concreting 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 in that location using S106 monies from other developments.

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

TWBC have failed to recognise the Elm Tree sports pitches, which are home to the largest sports club in Paddock Wood but have limitations for parking and access.

The above points need to be considered as part of a robust sports strategy for Paddock Wood, rather than individual bits of improvement.

### **Education and Childcare:**

Following the removal 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
- There is a question mark as to whether Mascalls would be able to take the increased capacity. KCC have reservations but feels it could be expanded to take the extra. This would, however, make Mascalls one of the largest in the county. Other suggestions to accommodate 3 form entry are not covered by the Council
- 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 form entry which is predicted 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.



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 are suggestions medium term for 2 x 2 form entry primary schools but with no information it is impossible to tell how appropriate this is in terms of accessibility, public transport etc.

There is insufficient preschool and nursery provision in the town. With only 1 nursery and 3 preschools 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, 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 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.

### **Employment**

The local plan only looks to be referring to allowing for more warehousing/freight movement sites in the area which will just increase the number of HGVs without any increase in road improvements to/from A21, A228 etc.

In general, these will only allow for the lower wage jobs and won't encourage/support a more mixed employment environment in Paddock Wood and will increase the number of people commuting to/from the town based upon the prices of the existing housing stock to find employment that can support the mortgage.

### **Conclusion:**

In summary, I believe that TWBC's response to the Inspector's findings to be unsound on the grounds of insufficient consultation with Paddock Wood residents and a worrying lack of engagement with Paddock Wood Town Council. In addition, the ten-year duration of the revised plan does not meet the 15-year minimum required. The proposed significant expansion of the town will cause major disruption for existing residents and with no benefits to be gained. For the reasons set out in this communication, we ask that the Inspector considers not just TWBC's pressure to approve the plan, but the incredibly negative impact that doing so will have on the Paddock Wood community for many years to come.

Sue Lovell and Alan Inhester

