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Sent: Wednesday, October 23, 2024 10:30 PM
To: Local Plan (TWBC) <LocalPlan@TunbridgeWells.gov.uk>
Subject: Objections to Paddock Wood developments with specific reference to updated IDP document and developments at STR/SS1

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Hi there,

As part of the latest consultation, I would like to object to the proposed developments on the following basis:

1. The Infrastructure Delivery Plan (IDP) is too vague.
 - There is no detail on phasing ie what PW can be clear of having and when that will.
 - There is not enough detail on infrastructure that would be forthcoming (more detail down below)
 - Detail on costs of infrastructure improvements are not clear enough. Only “indicative costs” have been given but more concrete costs are now needed.
2. Secondary schools:
 - TWBC is now focussing on expansion of Mascalls Academy to allow for the expected increased number of secondary pupils
 - However, there is only high level agreement to this so it cannot be considered as a foregone conclusion
 - The plot allocated for a new secondary (in North western parcel) now seems a lower priority. In any case, has KCC agreed to fund this ? There is no evidence provided that they have. Funding of additional capacity at Mascalls is still not confirmed.
 - If Mascalls expansion were to be agreed to go ahead, what would happen to the north western plot allocated for an additional secondary school. The land is on flood zone 2 so cannot have residential housing in it. So what would be the plan for that land ?
 - In short, provision of secondary school provision is still very unclear.
3. Heath infrastructure:
 - Mention is made of new health establishments but what exactly would be provided is not defined. It is too vague.
 - The plans suggest separate providers in East and West of PW but no detail is given as to what exactly they would be providing (eg GPs, dentistry etc)
 - Instead, PW would need at least a full new medical centre like Woodlands and another dentists surgery
4. Flood risk:
 - There is no mention of flood risk management and how it is intended that future flooding as a result of developments be avoided
 - There is no mention of a specific policy for PW and nothing is mentioned in the document regarding western parcel **STR/SS1**
 - TWBC has said that the Environment Agency (EA) has accepted that it is acceptable to develop on western side of PW. However, flood risk assessments are not done by EA and should be done by KCC and/or Upper Medway Drainage Board. Instead, TWBC seems to be doing their own flood risk assessment and relying on EA analysis.
 - TWBC was asked by the inspector to explain clearly how they had implemented the “Sequential Test”. This was to explain why some sites for development were identified over others. Specifically, regarding the more flood prone area to the west of PW:
 - In the **Local Plan Sequential Test** document above, TWBC explained the flow in terms of what they needed to consider
 - But they made no mention of what areas were considered and rejected and what the exact reason for rejection was
 - No flood modelling was included in any of the submitted analysis

- TWBC has therefore not done what the Inspector requested TWBC to do in order that residents in PW could be sure that the areas to the west of PW were the only ones available for additional development.
5. Walking/cycling/connecting routes and access:
 - There are separate plans for each parcel but no overarching plan for the whole of PW to allow connection across the whole town
 6. Roads:
 - There is some focus on roads outside PW but no focus and capacity/changes within the town
 - There is no detail regarding improvements to roadways/highways in PW. There is also not enough thought given to the roads surrounding Paddock Wood which at busy times of the day are already extremely busy.
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 7. Waste Treatment plants:
 - There is no clarity on how enhanced waste treatment would work if developments are approved
 - No land has been identified as available for a new plant and no detail is given as to where a new plant needs to be
 - TWBC refers only to “slight expansion” being needed but this would not be enough given the increased number of homes
 8. Bus routes:
 - New bus routes support information is very vague and not tangible enough
 9. New sports hub:
 - No plan is given for a new sports hub building
 - Only outside spaces is provided for
 - PW would need an additional proper hub to provide the full range of sports requirements
 10. Consultation between TBBC and PWTC:
 - The lack of consultation was raised as an issue by PWTC and PW residents at the July hearings
 - There has since only been one meeting between the 2 councils and it took place very recently (18 October 2024)
 - There was no clear agenda and no reference was made to the effect of developments on PW town centre
 - There should have been greater transparency and contact between the councils and TWBC should have exercised its duty to consult to a much greater degree.
 - The updated local plan makes no mention Paddock Wood Town Council’s own Neighbourhood Plan. This and the above indicates that the duty to consult has not been met. This subject has been raised at the July hearing.

As a general point, myself and many other residents of PW have found the documents submitted by the council to be opaque to say the least. They are not designed for your average resident to be able to easily understand. This raises issues of accessibility and myself and others do not think TWBC would want to be seen to be acting for the benefit only of lawyers and consultants, and not their residents. This point is being raised separately with the inspector.

Regards
Jonathan Easteal