



Paddock Wood Town Council

Matter 9 – Other Matters and Main Modifications Necessary for Soundness

ISSUE 1 – Material Changes in Circumstances since Stage 2 Hearings

Q1. Has there been any material changes in circumstances since the Stage 2 hearings, either at a site-specific level, where the supporting evidence is concerned or in relation to national planning policy and guidance which is relevant to the examination? If so, do any of these changes make the Plan unsound and/or require modification?

PWTC Response:

1. The Town Council has delivered the Community Centre which was assisted by S106 from the last Local Plan period. Alongside this building there were allocated funds for improvements in sporting facilities in this space which have been used to refurbish the tennis courts and improvements to the football pitch are planned.
2. At a local level we note TWBC has published an updated Local Development Scheme (LDS). This assumes the Inspector's Report is issued between November 2024 and January 2025 and that the Local Plan will be adopted in January – March 2025 which is of course yet to be seen.
3. The LDS reveals the disparity of scrutiny, planning and consultation TWBC has in store for the Paddock Wood and East Capel Structure Plan SPD versus the Tunbridge Wells Town Centre DPD.
4. As we have seen throughout this examination the issues facing Paddock Wood are complex and it is a sensitive location for development due to Flooding, Green Belt, landscape and lack of infrastructure. Despite this the Council appears to think it is appropriate to prepare an SPD and not a DPD for Paddock Wood and East Capel. The SPD does not need to be independently examined and will not be scrutinised through such a process. This is particularly concerning given the lack of evidence on any details for how the strategic policy will be coordinated, funded or delivered. In addition, the LDS does not even include Paddock Wood Town Centre in its scope of the SPD which is shocking given that the Local Plan seems to focus so much on its sustainable role. For example, what has changed to make the delivery of a cycling strategy more possible now than when previously published? This SPD approach will ensure a piecemeal future for Paddock Wood which is what the town has experienced to date.

5. Furthermore, TWBC has programmed the drafting of the SPD starting next month through October with a public consultation programmed for November – December 2024. So the Council plans to consult on an SPD based on a Local Plan which may not have even had an Inspector’s Report issued (not allowing for the Fact Check stage) and before adoption of the Local Plan? This is entirely inappropriate and demonstrates that TWBC is simply trying to rush through an SPD as tick box exercise and is not genuinely interested in engaging the community and key stakeholders on the SPD which is the largest development planning in the Local Plan and that requires the majority of strategic infrastructure in the Borough. It then plans to adopt the SPD between January and March 2025 which seems entirely unrealistic to take account of consultation responses and update the SPD as appropriate.
6. It is clear that for the sake of the future of Paddock Wood and the wider Borough that this should not be an SPD and it should be an DPD. Without due process and the required scrutiny of an independent Inspector the risks are too considerable to even contemplate.

Paddock Wood, including land in east Capel, Structure Plan SPD	
Indicative timetable	<u>Draft prepared</u> August – October 2024 <u>Consultation</u> November – December 2024 <u>Adoption</u> January – March 2025

Figure 1: TWBC Local Development Scheme (June 2024)

7. In contrast the New Royal Tunbridge Wells Town Centre had a consultation in March – April 2024, another consultation planned for February – April 2025 and a pre-submission consultation planned for July – September 2025.
8. It appears that TWBC is attempting to avoid any further independent scrutiny and consultation on its plans for Paddock Wood as it must have concerns about the associated risks of this given how complicated planning for Paddock Wood is in actual practice. This is especially the case when the finer grain details for Paddock Wood are not clear, and the Council most likely wants to leave these issues to the Planning Application stage – this will not be an effective approach.
9. The Town Council urges the Inspector to consider this matter in more detail and recommend that a DPD is prepared for Paddock Wood and East Capel which includes Paddock Town Centre, for the reasons that are set out and that have become so clear from the Examination process to date. This is particularly the case if the Inspector were to recommend a ‘stepped’ housing need and trajectory for the Local Plan which would mean that there is not the need to

'rush through' plans and applications for Paddock Wood which is a serious risk as things currently stand.

Q2. Does the evidence-base supporting the Plan remain up-to-date?

PWTC Response:

10. The Town Council has set out in numerous places where the evidence base supporting the Plan is out-of-date. This includes but is unlikely unlimited to:
- Infrastructure Delivery Plan (IDP)
 - Infrastructure Cost Assumptions - related to the IDP is the lack of evidence setting out the cost assumptions for the infrastructure required.
 - 'Modal Shift' assumptions behind the SWECO transport modelling.
 - The Town Council requested the growth assumptions for neighbouring authorities including Tonbridge and Malling BC and Maidstone BC, but this has not been provided.
 - Pembury Road Corridor Study.
 - Green Belt Assessment – in relation to the reduced development at Paddock Wood and East Capel and relocation of the secondary school
 - Viability Evidence – this does not include for example the new transport modelling or the associated costs of mitigation.
 - Housing Trajectory – the Council is currently using an updated housing trajectory that has not been shared or published.
 - Education Provision Feasibility Paper for Paddock Wood – it is understood that the Council is preparing this, yet it has not been shared or published.
 - Gypsy and Traveller Accommodation Assessment – this assessment was published in 2018 but the interviews and surveys were undertaken in 2017 which is not nearly 7 years ago. The study covers 2017 – 2037 which is not in line with the Local Plan period.
 - The Sevenoaks and Tunbridge Wells Economic Needs Study was published in August 2016 nearly 8 years ago which is going on a decade ago. The economy has changed significantly since this study was prepared and is very unlikely to be a piece of evidence base which one can rely on for formulating policies and making allocations.
 - Landscape Assessment - there is little recognition of the historic landscape around Paddock Wood which consists of medieval settlement and historic farming features with many small historic hamlets surrounding the town.

ISSUE 2 – Local Green Space Designations

Q1. At the Stage 2 hearing sessions, the Council confirmed that not all Local Green Space designations had been put forward by the local community. Are areas of Local Green Space justified where this is the case? Is it a requirement in order for Local Green Spaces to be found sound?

PWTC Response:

11. The Town Council does not have any comments to make on this apart from that it wishes for the Local Plan to enable a review of and potential designation of additional Local Green Spaces in the Parish as part of any future review of its Neighbourhood Plan.
12. The Paddock Wood Neighbourhood Plan identifies the need for ‘green fingers’ (green gaps) extending from the town centre into the wider countryside to retain the rural nature of the environment.

ISSUE 3 – Accommodation for Gypsies and Travellers and Travelling Showpeople

Q1. What are the accommodation needs for Gypsies and Travellers and Travelling Showpeople over the plan period? How will these needs be met?

PWTC Response

13. As we have set out above and in our previous responses, this evidence is out of date and needs to be revisited otherwise allocations are being made on outdated assumptions about families and their needs.
14. In recent years TWBC may have approved in excess of the assessed need for new plots/sites, for example the site to the north of Paddock Wood has almost tripled in size over the last few years (12 to 30 +units pitches). Two other sites have been approved (Mile Oak Road & Queen Street). We question whether these have been taken into consideration in the preparation of the assessment of need and supply.

Q2. Is it sufficiently clear to users of the Plan which sites are allocated to meet the needs for Gypsies and Travellers and Travelling Showpeople?

15. In relation to the the Paddock Wood policy (STR/SS1) the proposed modifications state: *“A three-pitch gypsy/traveller site (to include space for one mobile home and one touring caravan per pitch) to be accommodated on the North - Western parcel south of the railway line in accordance with policy H9”*

16. The location shown on the Structure Plan is not particularly clear and there is no explanation in the Strategic Sites Addendum on what other options were considered or why this location was selected and why it has moved from the north of the railway at Newbridge Park.
17. Sites previously identified for Gypsies & Travellers pitches are being marketed for market housing when planning permission was granted recently. This suggests that there may be a lack of need for pitches – without an up to date evidence base of need this could very well be the case.
18. Fig 2 (see below) identifies a site which is not connected for the additional three families linked to the family at Newbridge Park – is this based on a further needs assessment which has not been published?

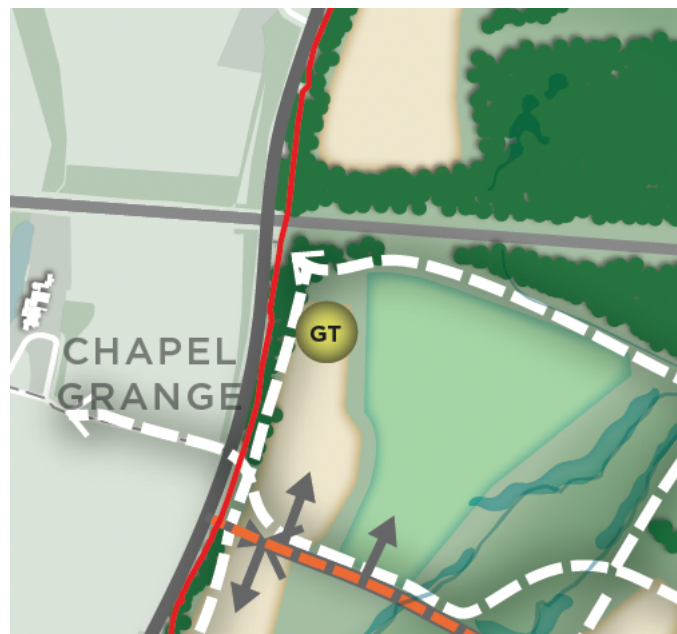


Figure 2: Structure Plan for Paddock Wood 046a Figure 5

19. The Land Use Budget in the Strategic Sites Addendum does not specify the size of the site being allocated for Gypsy and Traveller site therefore it is unclear as to whether this has been factored into the land use budget. As a result it is unclear as to whether the site size will be adequate for three pitches which is an important consideration to determine if the site is suitable.

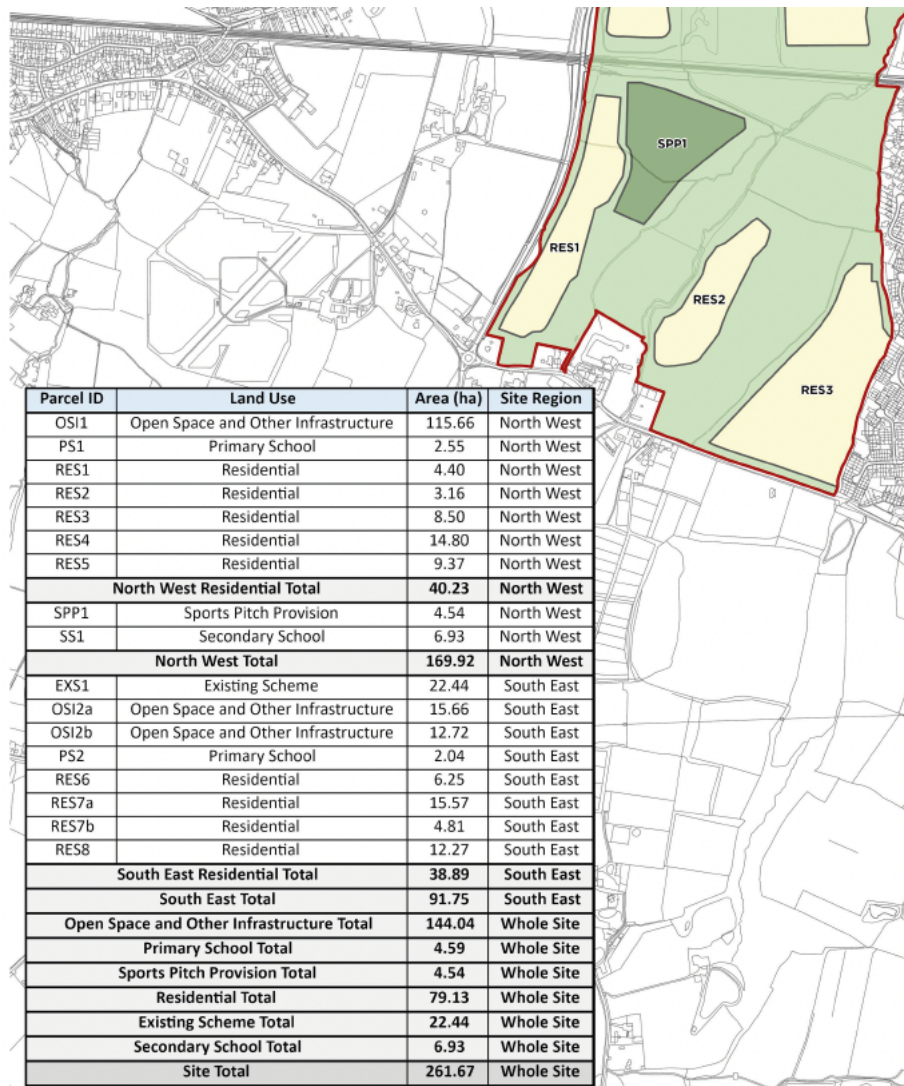


Figure 3: Structure Plan for Paddock Wood O46b Figure 13

Q3. What process and methodology did the Council use to determine which sites to allocate?

PWTC Response:

20. This will need to be explained by TWBC as it is not clear to the Town Council. The Paddock Wood Strategic Sites Addendum (October 2023) simply states the following at Paragraph 3.1:

“Policy also requires provision of a serviced Gypsy & Traveller site of 3 pitches. Location of this facility remains flexible within the Structure Plan, however an indicative location, pending detail studies on appropriate access, has been placed close to the A228 in the northwestern quadrant.”

Q4. Are the allocated sites justified, consistent with national planning policy and capable of being developed over the plan period?

PWTC Response:

21. There is no evidence from the Council to suggest that this the case in Paddock Wood. The Town Council is keen to understand what evidence TWBC has to support its decision to allocate this site in Paddock Wood. It appears from the David Lock work that it is pending detailed studies on appropriate access which the Town Council has not seen.

ISSUE 4 – Main Modifications Necessary for Soundness

Q1. At the Stage 2 hearing sessions the Council suggested that other changes are necessary to the submitted Plan to make it sound. Except for those policies referred to above, what other Main Modifications do the Council consider are necessary to rectify any soundness matters?

In answering this question, it would assist the examination if the Council could produce a composite schedule of “suggested” Main Modifications for the upcoming Stage 3 hearing sessions. This should include the suggested changes proposed in response to the Inspector’s Initial Findings, and any other changes considered necessary by the Council, either as a result of discussions in previous hearings or changes in circumstances since Stage 2.

PWTC Response:

22. This is a question and action for TWBC. The Town Council would welcome the opportunity to discuss any potential changes on the Paddock Wood policy with TWBC in advance of any issuing of Main Modifications.