



Examination Statement – Matter 4
The Strategy for Paddock Wood
Tunbridge Wells Local Plan Examination
Stage 3

Representations on behalf of Crest Nicholson

June 2024

On behalf of **Crest Nicholson**

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1 Introduction

- 1.1 This Statement has been prepared by Stantec on behalf of our Client, Crest Nicholson, who has an interest in the land to the north west of Paddock Wood that forms a significant part of the housing allocation STR/SS1: The Strategy for Paddock Wood, including land east of Capel. This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.3 This Statement does not respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.4 These representations have been considered in the context of the tests of 'soundness' as set out at paragraph 35 of the NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2 Response to Matter 4 – The Strategy for Paddock Wood

Issue 1 – Flooding and Flood Risk

Q2. Do the changes suggested by the Council in the Paddock Wood Strategic Sites Master Planning Addendum address the soundness issues raised in the Inspector's Initial Findings?

- 2.1 The Inspector's Initial Findings states, at paragraph 52 that "*Paddock Wood is a town with a good range of services, employment premises and public transport provision...I therefore agree with the Council that it represents a 'logical choice' for growth*" as set out in the Submission Local Plan.
- 2.2 In terms of land to the west of Paddock Wood, the Inspector (at paragraph 47) also agreed with the Council that where a large parcel of land contains different flood zones, it does not automatically follow that the entire parcel should be discounted because one part is subject to flooding. To accord with national planning policy, however, he advised the Council to reconsider the options for development set out in the DLA Strategic Sites Masterplanning and Infrastructure Study and associated flood modelling to reconsider Option 3 where all residential development is removed from Flood Zones 2 and 3.
- 2.3 In order to do that, the Council commissioned a review of baseline evidence in order for DLA to review and update Option 3, alongside Scenario 2 of the Infrastructure Framework which considered Paddock Wood sites only.
- 2.4 The DLA Strategic Sites Masterplanning and Infrastructure Study (The Masterplanning Addendum, PS_046) was prepared in response to the Inspector's Initial Findings, as an evidence base document to support TWBC in refining its development strategy and the feasibility of development in and around Paddock Wood.
- 2.5 The updated baseline information included new modelling to include rainfall events and an uplift due to climate change. A fluvial flood risk with a +37% allowance for climate change was applied to both Paddock Wood streams and the Medway "*for robustness*" (paragraph 2.9 of the Strategic Sites Masterplanning and Infrastructure Study, PS_046).

- 2.6 This has reduced the development capacity of the sites to the west of Paddock Wood significantly (resulting in 610 fewer homes in the west) even when compared to the previous Option 3 and will have consequential impacts of the level of social and transport infrastructure required (paragraph 2.12 of PS_046).
- 2.7 Further, a high level surface water management approach was applied. To account for the land take for SUDS, paragraph 2.15 of PE-046 explains that the assumed density dropped by 15% from 35dph to 30dph.
- 2.8 According to paragraph 1.1 of the JBA September 2023 Technical Note on River Medway and River Teise Updated Climate Change Flood Zone Modelling and Mapping (PS_042) the modelling and mapping was prepared for flow allowances of +27% and +37%, reflecting the Central and Higher central estimates of climate change applicable to the catchment for the 2080s epoch (years 2070-2125) according to the latest guidance.
- 2.9 In Crest's opinion, therefore, not only has the work undertaken by TWBC and its consultants addressed the soundness issues raised in the Inspector's Initial Findings, but it has built in robustness to these conclusions by taking the worst case scenario for climate change, and SUDS.
- 2.10 This is reflected in the consequential reduction in new houses being proposed to the west of Paddock Wood: minimum of 770 on Parcel A (north west) on Crest's land interest and minimum of 514 on Parcel B (south west) on Dandara's land interest.

Q3. If not, what Main Modifications are required to make the Plan sound?

- 2.11 Other than the suggested rewording of Policy STR/SS1 in Appendix A to this Statement to make it more effective and justified, it is Crest's opinion that no further main modifications are required.

Issue 2 – Education Provision

Q1. What is the projected requirement for primary and secondary school education as a result of the suggested changes to the Plan?

Primary School Requirements

- 2.12 Kent County Council Education assumes a pupil product yield of 0.28 per house and 0.07 per flat for the purpose of forecasting primary school requirements. Thus, working on a worst case of 0.28 (i.e. no flats) and the minimum number of 2444 dwellings, the development of PWeC would generate 685 primary aged pupils:
West: 1284 dwellings x 0.28 = 360 pupils
East: 1160 dwellings x 0.28 = 325 pupils
- 2.13 Assuming no capacity locally, and as primary schools have 7 year groups, a 2FE primary school (which is the Government’s preferred size) has capacity for 420 children.
- 2.14 Two 2FE primary schools (840 places) are now proposed to serve the new development of PWeC, one to the east and one to the west; which would more than address the needs of the allocations to the west and to the east.

Secondary School Requirements

- 2.15 KCC assume a pupil product yield of 0.20 per house and 0.05 per flat for the purpose of forecasting primary school requirements. Thus, working on a worst case of 0.20 (i.e. no flats) and the minimum number of 2444 dwellings, the development of PWeC would generate 489 secondary aged pupils:
West: 1284 dwellings x 0.20 = 257 pupils
East: 1160 dwellings x 0.20 = 232 pupils
- 2.16 Assuming no capacity locally and ignoring the issues of selective schools (which was 34.18% of the total number of pupils at KCC secondary schools in 2023/24 and 46.29% of pupils in Tunbridge Wells (KCC’s Facts and Figures, June 2024)) as secondary schools have 5 year groups, a 4FE secondary school would have capacity for 600 pupils (with 1FE of secondary education provision equating to 150 secondary school places).
- 2.17 Revised Policy STR/SS 1 under Strategic Infrastructure (2(h)) provides for: *‘The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision*

can be delivered through other means such as expansion of existing secondary school provision whilst Policy SS/STR 1(A) (vii) goes on to refer to *‘Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required’* and is therefore adequate.

- 2.18 In reality, however, the secondary pupil yield from STR/SS1, taking into account the lower county average percentage attending selective secondary schools of 35% (a slight rounding up, but not the 46.29% in Tunbridge Wells) and the lower pupil yield for flats, is much more likely to be c.320 pupils which equates to 2FE secondary school places, so is more than adequately covered by the requirements of Revised Policy STR/SS1.

Q2. How will the needs for secondary school education be met? Will this be through the expansion of Mascalls Academy and/or provision of a new school? What evidence has been produced which considers the merits of each option?

- 2.19 As set out in section 4 of PS_054 (paragraph 4.38 onwards) Kent County Council Education confirmed that the secondary education requirements for circa 2,500 dwellings would result in there being a demand for an additional 490 pupils to be accommodated in the secondary school education system locally; and that a yield of 490 pupils is equivalent to 3.27 FE. However, when taking into account the potential for some flats and 1 bedroom properties this would reduce the requirement to a full 3 FE of additional secondary school provision, not taking into account the proportion of children attending selective schools.
- 2.20 Various options were then considered by the Council as to how this 3 FE provision could be met, either through existing Secondary Schools found locally such as Mascalls Academy (by 2 or 3FE), Skinners Academy in Tunbridge Wells (1FE)), Leigh Academy, Brook Street, Tonbridge (2-3 FE), Hugh Christie School, White Cottage Road, Tonbridge (1FE), or a standalone new school. Section 4 of PS_054 goes on to explain why Skinners Academy and the secondary schools in Tonbridge were effectively dismissed, leaving just the possibility of the expansion of Mascalls or the provision of land for a new standalone school on one of the proposed allocation sites.
- 2.21 The proposed changes to policy STR/SS 1 under Strategic Infrastructure (2(h)) thus provide for, *“The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision”* whilst Policy SS/STR 1(A) (vii) goes on to refer to *“Safeguarding*

of land for 4FE secondary school that has land available to expand to 6FE should it be required”.

- 2.22 Having regard to the above, the strategic site promoters at PWeC have been in detailed discussions with TWBC, KCC and Leigh Academy Trust (LAT) (which runs Mascalls Academy) about the possibility of expanding Mascalls Academy *on its existing site* from an 8FE to an 11FE school. To this end, a scope was agreed with KCC, and IDP were instructed and prepared the Mascalls Academy Expansion Feasibility Report, May 2024 attached at Appendix B of this Statement. It is understood that this Report has been reviewed and agreed by Atkins on behalf of TWBC. The Feasibility Report clearly sets out that Mascalls can be expanded on its existing site by 3FE from an 8FE to 11FE secondary school by way of a combination of demolition and rebuild and repurposing of existing buildings. It explains the phasing and delivery of the proposed works and how these can be arranged to minimise any disruption, and how said expansion works would greatly enhance the school's academic offer. As discussed in Week 1 of the resumed hearings, the Feasibility Study has been the subject of collaborative working with KCC Education and LAT and who are fully supportive of the proposed expansion of the school. To this end, Appendix B also contains a letter from LAT confirming its involvement in the process and agreement to the outcomes of the Feasibility Study, the proposed plans reflecting the academy's operational and academic needs.
- 2.23 It is hoped that a SoCG between all relevant parties will be presented to the examination which will then enable changes to Policy STR/SS1 and Revised May 28 to reflect the fact that secondary school provision can be achieved at Mascalls Academy and that the safeguarded land on Parcel A (land to the north west) can therefore be deleted.
- 2.24 Whilst we leave TWBC to explain the situation in more detail at the Examination, we are happy to respond as necessary at the Examination ourselves as to how this scenario could be taken forward.
- 2.25 Crest believes that expanding the existing school is a significantly more efficient way to help deliver the secondary educational needs of the town, and that delivery could be quicker and deliver a better facility that would be of benefit to all.
- 2.26 As a result of this feasibility work and subject to a SoCG, the reference at Revised Policy STR/SS1 1(A) (vii) and 2(h) should be deleted and a criterion added to reference financial contributions only for secondary school provision. The safeguarded sites annotation should be removed from Revised Map 28.

Q3. What is the justification for safeguarding an area of land for a secondary school to the northwest of Paddock Wood? Is the site developable for the type and size of school envisaged?

- 2.27 As a result of the IDP Mascalls Academy Expansion Feasibility Report, May 2024 (Appendix B) which shows the additional 3 FE generated by the proposed development of the land at PWeC can be accommodated at Mascalls Academy, Crest does not believe there is any justification for safeguarding an area of land for a secondary school to the north west of Paddock Wood.
- 2.28 The reference at Revised Policy STR/SS1 1(A) (vii) (and 2(h)) should be deleted and a criterion added to reference financial contributions only for secondary school provision. The safeguarded sites annotation should be removed from Revised Map 28 in the Council's Main Modifications.

Q4. How and when will the proposed secondary school be provided? Who will fund and deliver the project and is this sufficiently clear to users of the Plan?

- 2.29 We would envisage any S106 agreement to include triggers for the release of financial contributions related to the scale of development proposed that would provide for the phased delivery of the proposed works at Mascalls Academy to facilitate the 3FE generated by the proposed development of the land at PWeC. The main considerations for the phasing of the development of the site will be balancing delivery of new homes allocated pursuant to policy STR/SS1 with educational needs; whilst also ensuring the least disruption to the school's curriculum.
- 2.30 Clearly the phased expansion of Mascalls Academy would be more effective and efficient than a new standalone school, which could take longer to deliver.

Issue 3 – Sports and Leisure Provision

Q1. What is the projected requirement for sports and leisure facilities as a result of the suggested changes to the Plan? Have needs been determined by relevant and up-to-date evidence?

Q2. How will the needs for sports and leisure facilities in Paddock Wood be met?

- 2.31 As set out in paragraph 3.16 of PS_046, the removal of Tudeley, the reduced number of new homes proposed at Paddock Wood, the new flood modelling, the reduced overall capacity of the growth sites to the west of Paddock Wood and the need to provide a new secondary school (or expansion of Mascalls Academy) resulted in the need for sports and leisure provision being reviewed to provide a proportionate reduction in facilities whilst considering how to maximise improvements to provision for Paddock Wood town as a whole. The new approach is to provide improvements to existing facilities as well as new provision of outdoor sports facilities within the growth area to the south west.
- 2.32 The revised approach also allows for Paddock Wood Town Council's position (as expressed throughout its made Neighbourhood Plan) on wanting to see improvements to existing sites and facilities to be taken into account.
- 2.33 DLA took the approach of reviewing what could be accommodated in the most appropriate way at existing sites at Putlands and Green Lane and then set out what remained from the February 2021 Sports Hub proposal.
- 2.34 Paragraph 3.21 of PS-046 states,
"In addition to the intensification of the existing sites, 4.5ha of land in the southwest of the growth areas is allocated for formal sports provision. This provision is in line with the required land provision set out in TWBC's Open Space Policy, but only for the western expansion sites. The previous 9.2ha allocated covered all expansion sites, including those in the east, but did not provide any upgrade or improvements to existing facilities within the town."
- 2.35 Paragraph 4.61 of PS_054 acknowledges that this approach satisfies the vast majority of provision set out in the original Structure Plan, and that further intensification of use could occur, for example by the replacement of the grass football pitch with an artificial surface, which can be used for more hours each week, supporting greater levels of participation and provision.

2.36 Paragraphs 3.22 and 3.23 of PS_046 go on to say, however,

“3.22 This land should aim to accommodate a reasonable proportion of the difference in provision between the Feb 2021 Sports Hub proposal and the new provision that can be accommodated within the existing sites (as set out in grey at the bottom of Table 2).

3.23 Given the reduced level of planned growth this previous level of provision may not be necessary. TWBC is progressing discussions with Sport England on the required and appropriate level of provision for the town.”

2.37 The IDP Mascalls Academy Expansion Feasibility Report, May 2024 has demonstrated that in terms of optimising sports provision at the school, in order to meet the standards of the Building Bulletin, the school can accommodate new all-weather facilities, including sports pitches and a 6 lane athletics track. This is not only a significant improvement and opportunity for excellent sports facilities at the school, raising its standing in the county, but also provides a significant improvement to sports provision for the town as a whole. The Leigh Academy Trust has demonstrated that its current facilities are well used by the general public outside of school hours (in the evenings, weekends, and holidays) and have confirmed that management arrangements would be put in place for this to continue with the additional facilities. (see their letter in Appendix B of this Statement).

2.38 If the expansion of Mascalls Academy is progressed then this allows TWBC to review the sports offer in the town and reconsider what is provided at Putlands, in particular. This could include replacing the 4 lane athletics track (which would need enlarging to 6 lanes and improvements to bring it up to standard) with rugby pitches, for example. This work could be done in liaison with Paddock Wood Town Council given their knowledge of the sports clubs in the town.

2.39 So although the actual requirement has not been specified at this time, it is clear that with the additional facilities that would come forward as part of the expansion of Mascalls Academy (not taken into account in the DLA Strategic Sites Addendum PS_046); the space at existing sports and leisure sites in Paddock Wood; the potential intensification of facilities to enable greater levels of participation and provision; the facilities and funding already being provided by committed/completed development in Paddock Wood; and the additional 4.54ha of land proposed to the south west of Paddock Wood there is ample space to be able to provide a proportionate increase in sports and leisure facilities for the revised growth strategy.

- 2.40 As a result of the DLA work, Revised Policy SS/STR 1 provides for:
- 1 (B) (iii): ‘A scheme designed with a landscape led approach; 4.54 hectares of land for sport and leisure provision including outdoor pitches, changing facilities, and car parking’.
 - 2(5): Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)’; and

2.41 This sports and leisure offer for Paddock Wood could be supplemented further by the new facilities proposed at Mascalls Academy, when the school expansion work is finalised, thus helping to create a bespoke and significantly improved sports and leisure offer for the town.

Q3. What is the justification for seeking to delete the proposed sports ‘hub,’ rather than move it to an area not at risk of flooding or modify the Plan in another way to make it sound?

2.42 This is for TWBC to address, although Crest reserve the right respond to any comments made.

Q4. How and when will the proposed improvements to facilities at Putlands and Green Lane be provided? Who will fund and deliver the projects and is this sufficiently clear to users of the Plan?

2.43 We would envisage any S106 agreement to include triggers for the release of funds related to the scale of development proposed that would provide for the phased delivery of the proposed improvements to facilities at Putlands and Green Lane, as well as those proposed on the land to the south west in Parcel B, as generated by the proposed development of the land at PWeC.

2.44 Clearly one of the main considerations for the introduction of the proposed improvements to facilities at Putlands and Green Lane will be balancing delivery of new homes allocated pursuant to policy STR/SS1 with sport and recreational needs; whilst also ensuring the least disruption to the existing facilities and we would look to TWBC to explain how these see this progressing.

2.45 To this end we understand that a high level Housing and Infrastructure Trajectory, which includes the trajectory of sport and leisure provision, along with other key joint infrastructure is to be presented to the examination in week 2 and reserve the right to respond to this when it becomes available. Clearly the provision of the future facilities at Putlands and Green Lane would be co-ordinated alongside the provision of the facilities and funding from existing sites

in Paddock Wood plus the facilities provided on the strategic growth Parcels A, B, C and D themselves to ensure a fully coordinated and holistic approach to sports and leisure facilities.

Q5. Have any feasibility studies been carried out to determine whether or not the sites at Putlands and Green Lane can be upgraded in the manner proposed? Are the sites developable?

- 2.46 PS_046 provides an indication in Figure 11 as to how the facilities on the sites at Putlands and Green Lane could be upgraded in the manner proposed.
- 2.47 If the expansion of Mascalls Academy is progressed then this allows TWBC to review the sports offer in the town and reconsider what is provided at Putlands, in particular. This could include replacing the 4 lane athletics track (which would need enlarging to 6 lanes and improvements to bring it up to standard) with rugby pitches, for example. This work could be done in liaison with Paddock Wood Town Council given their knowledge of the sports clubs in the town.
- 2.48 It is clear that with the additional facilities that could come forward as part of the expansion of Mascalls Academy (not taken into account in the DLA Strategic Sites Addendum PS_046); the space at existing sports and leisure sites in Paddock Wood; the potential intensification of facilities to enable greater levels of participation and provision; the facilities and funding already being provided by committed/completed development in Paddock Wood; the facilities being provided within each Strategic growth Parcel; and the additional 4.54ha of land proposed to the south west of Paddock Wood that there is ample space to be able to provide a proportionate increase in sports and leisure facilities for the revised growth strategy.

Issue 4 – Highways Infrastructure

Q1. What effect would the suggested deletion of the Five Oak Green Bypass have on the distribution of traffic across the highway network? Does the growth around Paddock Wood require additional highways mitigation not previously identified?

- 2.49 The Transport and Movement section of the Paddock Wood Strategic Sites Masterplanning Addendum (PS_046) sets out how the change in allocations and reduction in potential capacity on sites at Paddock Wood have an effect on the required level of transport infrastructure provision which is primarily focused on a reduction in the need for new highways construction.
- 2.50 Off-site highways provision has been re-examined as part of TWBC's Stage 3 Highways Modelling (undertaken by SWECO) in November 2023. This considers the updated development capacity figures of the sites and tests off-site vehicle traffic mitigation measures across the local highways network.
- 2.51 Within PS_059, Tunbridge Wells Local Plan Stage 3 Part 2 Outcomes, November 2023, updated traffic modelling has been undertaken to determine the traffic impact of the revised allocations and removal of Tudeley Village. This provides technical recommendations for infrastructure with the following being noted:

“Although the data analysis shows that congestion rises along the B2017 through Five Oak Green link in the Local Plan scenario, the demand is not seen as being of a level to justify a major expansion in link capacity or a new link road such as the Five Oak Green bypass that was previously considered. However, it is recommended that consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area.”

- 2.52 The above is reiterated in the information contained in the appendix to TWBC Matter 3 issue 2 statement (see p 23/55 of SWECO's - Strategic Transport Assessment – Modelling Appraisal (18/04/2024)).
- 2.53 As paragraph 2.29 of the Paddock Wood Strategic Sites Masterplanning Addendum states,
“The previous Scenario 2 infrastructure schedule excluded the Five Oak Green bypass, on the basis that it was primarily needed to support development at Tudeley Village. “
- 2.54 Paragraph 2.30 goes on to explain that the Tunbridge Wells LCWIP (Part 2) has developed detailed proposals for Paddock Wood and was published after the February 2021 report. These broadly relate to the existing built up area and where connections can be made to the growth areas. As part of the previous study, liaison was undertaken with the LCWIP team to ensure that inter-urban routes and Paddock Wood infrastructure was aligned.
- 2.55 This fits in with the proposed changes to major infrastructure such as the proposed secondary school which is now being proposed to be located in Paddock Wood; thereby no longer creating any significant impact on Five Oaks Green of vehicles travelling westward to Tudeley Village. Further, the sports provision proposals have changed and again will be to support the reduced development at Paddock Wood and not the initial Tudeley Village new settlement and a larger development at Paddock Wood; therefore there will be no impact on Five Oak Green coming eastwards towards Paddock Wood from Tudeley.
- 2.56 The level of additional traffic generated along the B2017 corridor, as assessed within Examination Document PS_049 'SWECO TW Local Plan Stage 3 Modal Shift Reporting', concludes that improvements here should take the form of 'wider traffic management measures' to direct additional traffic to the strategic road network, as opposed to a major highways scheme to accommodate traffic, such as the Five Oak Green Bypass. Such traffic management measures could take the form of speed reduction and attenuation features, supporting sustainable transport interventions and modal shift enablers, and could be delivered / funded by Paddock Wood developers through planning and Section 106 mechanisms.

Q2. Is the Colts Hill Bypass required as a result of the growth proposed around Paddock Wood? How will it be funded and delivered?

- 2.57 The need for the Colts Hill Bypass has, as set out in chapter 11 of the TWLP 2006, been muted since the 1990's, with land safeguarded pursuant to policy TP12 of the 2006 LP. The latest alignment of what is now referred to as the Colts Hill Improvements is as shown on 'figure a' of PS_050 and is costed at 7,250,000.00 in PS_061b (1). These improvements are required due to existing capacity constraints on the network that will be exacerbated by the growth proposed around Paddock Wood.
- 2.58 Crest accepts the reduced requirements for the Colts Hill Bypass scheme, as a result of the removal of Tudeley allocation and the reduction of new houses in Paddock Wood, to be fair and proportionate to allocation STR/SS1. This is on the basis of the reduced costs set out in the Council's evidence and the committed funds already in place for the Badsell roundabout.
- 2.59 The proposed improvements would be funded via S106 agreements with all the Paddock Wood developers. The agreements would include triggers for the release of funds related to the scale of development proposed.
- 2.60 This is standard practice and will form part of the Phasing and Implementation Plan, conditions and s106 obligations as set out in the 'Strategic Infrastructure' element of Revised Policy STR/SS1.

Q3. What effect will the proposed Colts Hill Bypass have on the setting of the High Weald AONB, landscape character and heritage assets? How have these factors been considered as part of the preparation of the Plan?

- 2.61 PS_050 RAG Assessment sets out a desk-based exercise of Preliminary Zone of Theoretical Visibility to consider the potential visibility of the Colts Hill Bypass scheme with and without assumed mitigation. Paragraph 1.4.3 of PS_050 states, however, "*in reality, visibility of the scheme would be less than that indicated on the plans, due to intervening vegetation and built form that isn't picked up by the 1m spatial resolution DSM data*".
- 2.62 It is expected that appropriate environmental mitigation measures would be designed during the detailed design process of the scheme, including a requirement to mitigate visual effects from the AONB. However, for the purposes of the RAG Assessment, mitigation was assumed to comprise potential landscape planting principles, with the sole aim to reduce visual effects

of the proposed sketch scheme; including woodland structure planting (trees and shrubs) to corners of fields and along the road, linear hedgerows with tree planting, and hedgerows.

2.63 Paragraph 1.4.7 sets out the findings with and without the assumed mitigation:

“Without assumed mitigation (Figures 1 and 2):

- *The proposed sketch scheme would likely result in limited visual effects over a very small part of the High Weald Area of Outstanding Natural Beauty (HWAONB), these being located to the south of the site, ranging from the southeast to southwest, and no more than circa 2.5km from the site.*
- *The proposed sketch scheme would likely result in partial visual effects up to 5km from the site, ranging from the northeast to north compass direction, being from south of Parker’s Green to west of East Peckham.*
- *It is considered that significant visual effects would be likely to be experienced at a distance of up to approximately 1km from the site; this being based on professional experience and indicated by area that the greatest visibility percentages of visibility occur on the ZTVs on Figures 1 and 3, ranging from 90% to 10%*

“With this assumed mitigation (Figures 3 and 4):

- *The visibility of the proposed sketch scheme would have reduced, to very limited to just perceptible visual effects over a very small part of the HWAONB; these being located in occasional areas southeast to the southwest of the site, and up to circa 2km from the site.*
- *The proposed sketch scheme would likely result in reduced limited and partial visual effects for a small area to the northeast at up to 5km from the site.*
- *The worst-case percentage visibility of the scheme would reduce to 20% and 10%.*
- ***The proposed sketch scheme with assumed mitigation is unlikely to result in significant visual effects, other than from locations immediately adjacent to the scheme.”***
- *It is anticipated that, in reality, the actual visual effects would be less than indicated on the preliminary ZTV plans, due to a greater amount of intervening vegetation being ‘on the ground’ than is indicated in the 1m spatial resolution DSM data.*
- *Based on professional experience of other highway infrastructure schemes, visual effects arising from a proposed road, and which are experienced from beyond 2km of that road, are unlikely to be significant in landscape and visual impact assessment / EIA terms.*

- ***The preliminary ZTVs indicate that planting mitigation as part of the proposed scheme has potential to considerably reduce visual effects.”***

2.64 Turning to heritage impacts the RAG assessment advises in section 2.1 that:

‘Listed Buildings: Two Listed Buildings are in proximity to the proposed bypass route (closest within c.100m), and the setting of the Listed Buildings would be of high sensitivity. There is potential for adverse effects on the setting of the Listed Buildings (note that separate heritage assessment will be required to determine heritage impacts), subject to historic purposes, and visual association and intervisibility with their surrounding landscape. Mitigation potentially required e.g. through careful retention of existing trees and provision of new landscape planting appropriate to the heritage setting and local landscape character. Appropriate mitigation is anticipated to reduce magnitude of effects, and there is potential for significant effects on the setting of Listed Buildings, in the long term, to reduce to not significant after mitigation.’

2.65 To conclude, therefore, the proposed Colts Hill Bypass with assumed mitigation is unlikely to result in significant visual effects and impacts on heritage assets would not be significant after mitigation. The mitigation will be further considered and designed as an integral part of the design of the bypass at the detailed planning stage; thereby potentially further reducing any visual impact.

Q4. What is the justification for suggesting the removal of the Five Oak Green Bypass from the Plan, but not the Colts Hill Bypass?

2.66 Paragraph 2.29 of the Paddock Wood Strategic Sites Masterplanning Addendum PS_046 states,

“The previous Scenario 2 infrastructure schedule excluded the Five Oak Green bypass, on the basis that it was primarily needed to support development at Tudeley Village. “

2.67 Paragraph 2.30 goes on to explain that the Tunbridge Wells LCWIP (Part 2) has developed detailed proposals for Paddock Wood and was published after the February 2021 report. These broadly relate to the existing built up area and where connections can be made to the growth areas. As part of the previous study, liaison was undertaken with the LCWIP team to ensure that inter-urban routes and Paddock Wood infrastructure was aligned.

- 2.68 In traffic impact terms, the TWBC Hearing Statement for Matter 3 – Issue 1 Location Accessibility – Appendix 1 – Strategic Transport Assessment – Modelling Appraisal sets out in Table 14 link capacity analysis for the B2017 and A228 corridors affecting Five Oak Green and Colts Hill, respectively.
- 2.69 It is clear from this analysis that whilst traffic conditions in Five Oak Green near or reach capacity under ‘2038 Local Plan Modal Shift’ scenarios, the link does not function over capacity, and the impact of PWeC traffic is not severe. As such, as there is the opportunity to positively impact the B2017 corridor under the ‘Monitor and Manage’ approach put forward by KCC and achieve a betterment on the link capacity results for this corridor through the implementation of Travel Planning measures, sustainable transport interventions and minor highway works, there is no justification for the proposed bypass when assessing the effects of the PWeC developments as now proposed alone.
- 2.70 In respect of Colts Hill, the same link capacity analysis shows the A228 at Colts Hill functioning over capacity under ‘2038 Ref Case’ and ‘2038 Local Plan Modal Shift’ scenarios. It is evident that the introduction of PWeC traffic to the network at this location, due to existing capacity constraints, sees a level of impact that warrants infrastructure intervention in the form of the Colts Hill Improvements.
- 2.71 Crest accepts the reduced requirements for the Colts Hill Bypass scheme, as a result of the removal of Tudeley allocation and the reduction of new houses in Paddock Wood, to be fair and proportionate to allocation STR/SS1. This is on the basis of the reduced costs set out in the Council’s evidence and the committed funds already in place for the Badsell roundabout.

Q5. In what ways does the evidence base rely on modal shift when considering likely future impacts on the highway network? Is the Plan justified by appropriate supporting evidence?

- 2.72 The Inspector’s Initial Findings states, at paragraph 52 that “*Paddock Wood is a town with a good range of services, employment premises and public transport provision...I therefore agree with the Council that it represents a ‘logical choice’ for growth*” as set out in the Submission Local Plan.
- 2.73 Paragraph 5.13 of PS_054 sets that Paddock Wood “*is fairly compact, relatively flat, with a concentrated town centre, where it is feasible that a majority of journeys could be via sustainable modes*”. The town is also served by a good rail service and existing bus network that can be improved and extended into the strategic growth areas. Further, the DLA

Masterplan envisages low traffic neighbourhoods with good pedestrian and cycling networks with managed vehicle movements. This will accord with LTN1/20 Cycle Infrastructure Design and the National Design Guide which prioritises active travel and will encourage modal shift.

- 2.74 It is understood that additional reporting on modal shift in relation to the PWeC sites is to be provided by SWECO on behalf of TWBC as part of their Hearing Statements for this matter. We thus reserve the right respond to any comments made.

Q6. Is it sufficiently clear to users of the Plan what strategic highways improvements will be needed as a result of the growth proposed around Paddock Wood, where and when? Is the Plan (as suggested to be modified) justified and effective in this regard?

- 2.75 The strategic highway improvements required as a result of growth proposed at Paddock Wood are set out PS_061b 'Addendum to Local Plan Viability Assessment Appendix I'. This clearly sets out in Table 1A infrastructure items alongside costs and timings by month.
- 2.76 Notably, where infrastructure items are consistent or comparable with those identified in the 2021 Submission Local Plan and the proposed changes to policy STR/SS1; the timescales for delivery broadly align with the Infrastructure Delivery Plan (Oct 2021) (CD3.142) e.g. the Colts Hill Improvements are identified as being delivered between months 73-84 in the PS_061b 'Addendum to Local Plan Viability Assessment Appendix I', which based on Local Plan adoption in Q4 2024 would see delivery in 2030-2031. This is also reflective of the 'Medium' term timescales identified for the Colts Hill Bypass in the 2021 IDP and 3.66 Strategic Sites Masterplanning and Infrastructure Main Report i.e. by 2025-2032. We would anticipate the updated IDP pushing this back to 31-32 to reflect the revised date for adoption as set out in the latest LDS (June 24 (PS_084) i.e. Q1 2025.
- 2.77 Ultimately phasing and funding will be dealt with in the Phasing and Implementation Plan, conditions and s106 obligations as set out in the 'Strategic Infrastructure' element of Revised Policy STR/SS1.
- 2.78 Subject to the changes proposed in the Appendix A to this Statement, Crest believes Policy STR/SS1 to be sufficiently clear to users of the Plan what strategic highways improvements will be needed, is justified, and effective. Phasing and funding will be dealt with in the Phasing and Implementation Plan, conditions and s106 obligations as set out in the 'Strategic Infrastructure' element of Revised Policy STR/SS1.

Issue 5 – Viability and Infrastructure Provision

Q1. Has the Infrastructure Delivery Plan ('IDP') been updated to reflect the suggested changes to the Plan?

- 2.79 From the answers provided in Week 1 of the re-opened Examination, we understand that an updated IDP will be consulted upon with the Main modifications. We do however reserve the right to respond to any comments made in statements during the Matter 4 hearing.

Q2. What evidence is there to demonstrate that the necessary infrastructure requirements can be delivered over the plan period? Is the Plan viable?

- 2.80 From the answers provided in Week 1 of the re-opened Examination, we understand that an infrastructure delivery/ housing trajectory plan is to be provided for Week 2. As such, we reserve our right to comment upon that when released. We can however confirm that the costs set out in the updated Viability Appraisal (PS_061) are, subject to clarity on costs sharing mechanisms and review to address the proposed expansion of Mascalls instead of a new 3FE secondary on Parcel A, viable and can be delivered when required over the plan period.

Issue 7 – Policy Requirements / Masterplanning

Q1. Do the suggested changes adequately address the issues identified in the Inspector's Initial Findings? If not, what changes are necessary to make the Plan sound?

Q2. Is the suggested policy wording justified and effective?

- 2.81 Subject to the changes proposed in the Appendix A to this Statement and the removal of the notation for the safeguarded land for secondary school to the north west of Paddock Wood on Revised Map 28, subject to the SoCG between TWBC, KCC Education and developers, Crest believes the issues identified in the Inspector's Initial Findings have been adequately addressed; Policy STR/SS1 is justified and effective; and the Plan is therefore sound.

Q3. The Green Belt Assessment Stage 3 Study identified potential mitigation measures to reduce impacts on the perceived separation between Paddock Wood and Five Oak Green. How does the revised masterplan relate to the evidence and need to ensure separation between the two settlements?

- 2.82 Paragraphs 4.145 of The Green Belt Assessment Stage 3 identified the following potential mitigation measures to reduce impacts on the perceived separation between Paddock Wood and Five Oak Green set out in the Policy:
- the retention and enhancement of hedging and trees along the A228
 - the need for development to be set back from A228 to reduce visual impact of development on countryside
 - use of internal hedging and tree belts along field boundaries to influence development layout
- 2.83 Paragraph 4.146 identified “other potential mitigation measures” that could include:
- reduce the urbanising effect of development when travelling along Badsell Road through use of set-back and appropriately designed road infrastructure to maintain the rural character of the road
 - gradation in scale of built form, with lower density development to the periphery and in vicinity of railway and Badsell Road
 - open space and planting to the west and south of the allocation to reduce impact on perceived separation between Paddock Wood and Five Oak Green
 - reduce the potential impact on the sense of separation from the washed-over settlement of Whetsted through use of set-back from the A228 and by enhancing hedgerow planting and introduction of characteristic small woodland copses and tree belts along the A228
 - use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with existing pattern of dykes and streams.
- 2.84 The DLA Framework Plan shown at Revised Map 28 still provides for all these mitigation measures, albeit housing is now shown instead of the sports hub in the south west corner, but there is still a large (approximately 20m) green buffer along the A228. Other measures suggested such as the gradation in scale of built form could also be applied in this part of the site to optimise mitigation of impact.

Issue 8 – Exceptional Circumstances

Q1. Following the Council’s suggested changes to the Plan, do the exceptional circumstances exist to alter the Green Belt boundary in this location, having regard to paragraphs 140 – 143 of the Framework?

- 2.85 Paragraph 141 of the NPPF (September 2021) requires that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it is necessary for the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including making as much use as possible of suitable brownfield sites and under-utilised land, optimising density of development (including policies that promote a significant uplift in minimum density standards in town centres and other locations well served by public transport), and informed by discussions with neighbouring authorities about whether they could accommodate some of this borough’s identified need for development.
- 2.86 The Council has done this as clearly set out in the Submission Local Plan and evidence base and as set out paragraph 6.183 of the Development Strategy Topic Paper (CD3.126).
- 2.87 Not providing for the Borough’s housing need due to environmental constraints would mean more families being disadvantaged and less affordable homes and specialist housing (for older people, people with disabilities, etc) being provided, which in turn would impact the health and wellbeing of residents in the borough, limit economic prosperity and create additional social deprivation and a larger affordability ratio. This, in turn, would create an imbalance between social, economic, and environmental factors.
- 2.88 The affordability issues already being experienced in TWBC is set out in the Council’s review of local housing needs (CD3.75). These issues will be made worse if TWBC does not release land from the Green Belt to accommodate its needs. Such acute affordability issues in Tunbridge Wells can only add weight to the exceptional circumstances required to amend Green Belt boundaries.
- 2.89 In relation to Paddock Wood specifically, paragraph 6.186 of CD3.126 states there are **additional** site and development specific circumstances which contribute to exceptional circumstances, as follows:

“For land at Capel and Paddock Wood:

- *the land proposed to be released from the Green Belt here is part of a wider release of non-Green Belt land to **deliver development in a sustainable location, around an existing settlement, with the potential to rejuvenate and revitalise the town centre...**;*
- *through the comprehensive development of this site, and particularly the land to the west of Paddock Wood (i.e. that which would be released from the Green Belt), it has been identified through the Strategic Flood Risk Assessment that there is the **potential for the flood mitigation required in association with this development to deliver “betterment” through reduced flood risk to existing areas of Paddock Wood and its surrounds.** This requirement is specifically included in the policy, and is considered to make a significant contribution to the exceptional circumstances for the release of this land from the Green Belt;*
- *Expansion of the town offers opportunities both within the new development and existing development to **increase the use of alternative modes of transport (to cars) for local journeys, improve Green Infrastructure and taken together with land at Tudeley there are opportunities to provide significant new highway infrastructure and localised highways improvements.***

2.90 In summary, the expansion of Paddock Wood is seen as benefitting from taking a comprehensive, integrated approach to growth of the town in order to effectively address transport, flood risk and other infrastructure provision, as well as to help provide an economic stimulus. None of these elements have changed as a result of reducing the number of dwellings to the west of Paddock Wood.

2.91 In deed, it could be argued that the release of Green Belt land at Paddock Wood is even more significant to provide for the borough's housing need, since the removal of the allocation at Tudeley.

Sustainable Patterns of Development

2.92 Paragraph 142 of the NPPF (September 2021) clearly states,

*“When drawing up or reviewing Green Belt boundaries, **the need to promote sustainable patterns of development should be taken into account.** Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

- 2.93 In the case of Paddock Wood, the development strategy will not only provide a sustainable expansion of the town but will bring betterment to the existing settlement through alleviating flooding, specifically by removing land from the Green Belt to the north west to provide a comprehensive flooding and drainage strategy, as well as full consideration of environmental improvements.
- 2.94 The Council’s evidence shows that as part of a wider strategy developing a major, transformational expansion of Paddock Wood following garden settlement principles, as set out in STR1, is a good sustainable option.
- 2.95 Development at Paddock Wood, under Revised Policy STR/SS1 will assist TWBC to:
- meet the housing (market, affordable and specialist housing) needs of the borough
 - support and enhance the sustainability of the second largest settlement in the borough, which is served by existing rail and public transport services
 - align growth and infrastructure, due to its sustainable scale
 - provide betterment to Paddock Wood town by addressing existing flooding issues, and thereby improving the environment and residents’ quality of life, as well as mitigating climate change and its future effects
 - provide social betterment with additional new primary and secondary schools, new and improved sports and leisure facilities and safer crossings of the rail line;
 - provide a compact, healthy, and active community that will be energy efficient and resilient.

- 2.96 When all these elements are put into the planning balance, it can be seen that TWBC is planning positively for the housing needs of its residents through its spatial development strategy, particularly through its strategy of promoting transformational expansion of Paddock Wood.
- 2.97 As a result, Crest considers that TWBC has exceptional circumstances for removing land from the Green Belt to the west of Paddock Wood.

APPENDIX A - SUGGESTED AMENDMENTS TO REVISED POLICY STR/SS1

Suggested Amendments to Revised Policy STR/SS1 – TO BE UPDATED RE: MASCALLS EXPANSION & SPORTS PROVISION

Notation: **New suggested text.** ~~Suggested deleted text~~ [Comment]

Development Principles

5. Be **landscape led and** 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;
6. Incorporate ~~zero and~~ low carbon development, in line **with the Future Homes Standards, or any future national update,** ~~the requirements of EN3, provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles in relation to the design, construction and operational stages;~~
7. Meet the informal and formal recreational needs of the development and provide areas of green and open space [as shown schematically on Map 28], and biodiversity objectives of Policy EN9 and which where possible integrates with neighbouring Parcels to ensure a consistent and legible functional and visual relationship between them. **This should incorporate a scheme of management of communal spaces and green infrastructure within the eastern and western parcels including provision for management and funding, initial community and stakeholder involvement with amenity, landscape, and biodiversity objectives for a period of 30 years from the completion of the development;**[\[moved from Masterplanning Criterion v\]](#)
11. Provide walking and cycling linkages within and between each parcel, together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside **in accordance with Policy TP2;...**
12. Where possible and practicable connect to and enhance the existing bridleways network;
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 for the whole of the allocation **as set out in the Appendix XX to this Local Plan**
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 [\[Suggest this becomes Criterion 15\]](#)
15. ~~The development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD)~~ **Further, joint masterplans for the West and the East of Paddock Wood should be prepared by the respective developers with the Council and relevant statutory consultees and submitted for approval with the individual planning applications to show comprehensive and cohesive development.** [\[Suggest this becomes Criterion 14\]](#)

Masterplanning

As set out above at [\[suggested\]](#) Criterion 14, the new development shall be delivered through a **joint** masterplan approach **for the West of Paddock Wood and (separately) East of Paddock Wood**

i. All development proposals ~~in relation to the Eastern and Western parcels shall be in accordance with an approved **the appropriate** Masterplan relating to each parcel that will respect the above requirements and take into account the Council's Structure Plan SPD.~~ Where development parcels abut each other and developers have worked collaboratively on masterplanning, this will be supported where it meets the other aims and objectives in this policy. ~~The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission in relation to (any part of) the relevant Parcel.~~

ii. Each Masterplan shall show the intended overall design and layout of the development and the proposed distribution and location of uses across the Parcel including its functional links with neighbouring Parcels, the existing community of Paddock Wood and Paddock Wood Town Centre and surrounding land which shall accord with, be based upon, and promote, garden community principles as required in para.2 above.

iii. Demonstrate how heritage assets and their settings will be sympathetically integrated into the development and their significance respected;

iv. Show all structural landscaping and indicative treatments to be provided (including boundary treatments);

v. Incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments. ~~This should incorporate a scheme of management of communal spaces and green infrastructure within the eastern and western parcels including provision for management and funding, initial community and stakeholder involvement with amenity, landscape and biodiversity objectives for a period of 30 years from the completion of the development;~~ [\[Suggest moving to amended Criterion 7 of Development Principles\]](#)

vi. **Show how the development will incorporate the full range of sustainable transport measures**, the proposed transport links, including access to the development and main internal highway links and all intended links within the site and to the surrounding footpath and cycleway and bridleway network, including proposed and potential footpath and cycleway and bridleway links to the wider area. All pedestrian and cycle links through the allocated site should be convenient and highly legible.

vii. Show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;

viii. ~~Provide for convenient and highly legible pedestrian and cycle links through the allocated site;~~ [\[moved to criterion vi. above\]](#)

ix. ~~Show how the development will incorporate the full range of sustainable transport measures;~~ [\[moved to Criterion vi. above\]](#)

x. Identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them as necessary;

xi. Incorporate a parking strategy in accordance with policy TP3 in relation to each Parcel.

xii. Proposals for employment development on the Northern Parcel shall be required to comply with the requirements of paragraph 8 (a), (b), (c) and (e) to (j) above. [\[Not sure what this refers to\]](#)

xiii. The masterplans for **the East and West Paddock Wood** shall include a phasing and implementation plan which shall identify the phasing of development across the whole of the relevant

Parcel to ensure that the development will be carried out in a manner that co-ordinates the implementation and occupation of the development and the timely delivery of such necessary on and off-site infrastructure as shall be reasonably required to support the development and occupation of each Parcel and its proper integration with neighbouring Parcels and the timely provision of Parcel specific and shared infrastructure taking into account Table 11 of the Council's SSMIS dated February 2021 as may be updated, **following consultation with relevant parties**, from time to time) or as may otherwise be reasonably required.

Strategic Infrastructure

The development shall be delivered in accordance with **the** phasing and implementation plan **as approved under Criterion xiii above**, which shall be required to be **and** secured by conditions and/or s.106 obligations **to individual developer applications** to ensure that:

- i) Development across the whole of the allocated site shall be capable of being integrated and phased and its impacts satisfactorily and mitigated;
- ii) There are supporting facilities (including access to green and blue infrastructure, leisure and sporting facilities, shops, health, community, and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community with an appropriate level of supporting infrastructure provision;
- iii) Occupiers have a range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian links;
- iv) 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 highway and other transport impacts;
- v) 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.

Save to the extent covered by CIL requirements (if any), development proposals in relation to all Parcels will be required to be supported by planning obligations that provide so far (as necessary and reasonable) either for

- (1) the timely payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, education and health provision and other necessary infrastructure as identified in the Council's Strategic Sites Masterplanning and Infrastructure Study as updated from time to time, **following consultation with relevant parties**, and/or
 - (2) its actual provision, as appropriate. This will include the requirement to pay reasonable and proportionate contributions retrospectively towards such infrastructure to support the development as may have been forward funded through other sources where the provision of such infrastructure is necessary and reasonable. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion or provision of any such infrastructure as may be necessary to support the development and its sustainability, to be determined by reference to evidence current at the point of determination.
- f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool);
 - g) Health provision split across one or all of the local centres;
 - h) ~~The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision;~~ **The delivery of secondary school provision equivalent to up**

to 3 Forms of Entry (3FE). Subject to the current feasibility study, this may be delivered through the expansion of Mascalls Academy or through the provision of a safeguarded site within the North-Western development parcel (both alternatives are shown on the Revised Map 28). If the latter is required, the safeguarded site will need to be able to accommodate a 4FE school as a minimum, with the land available to expand to 6FE should it be required. Kent County Council will fund the additional classrooms beyond the 3FE, if required. [to reflect our understanding of the situation, as set out in paras 3.7 – 3.9 inclusive]

- i) Cycle and pedestrian links across the development parcels and linking into the existing settlement including a **strategic improvement of a** north-south pedestrian and cycle bridge over the railway line linking the North Western and South Western parcels, linking neighbourhoods, and providing access to community facilities. **In regard to the railway bridge, the Council will take the lead and will facilitate delivery between all relevant parties to ensure timely and efficient delivery;**

Suggested Amendments to Policy STR/SS1(A) – North Western Parcel Requirements

Policy SS/STR 1(A) - North Western Parcel Requirements

- vi) A minimum of 770 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- vii) A mix of housing in accordance with policy H4. [Duplicates Criterion 3 of Development Principles]
- viii) ~~A scheme designed with a landscape led approach;~~ [Duplicates Criterion 5 of Development Principles, as suggested to be amended above]
- ix) A two-form entry primary school, safeguarded to enable expansion to three form entry;
- x) 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;
- xi) **Subject to being viable**, a local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total;
- xii) Safeguarding of land for 4FE secondary school that has land available to expand to 6FE, should it be required;
- xiii) ~~Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;~~ [Duplicates Criterion 11 of Development Principles, as suggested to be amended above]
- xiv) ~~Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;~~ [Duplicates Criterion 6 of Development Principles, as suggested to be amended above]
- xv) ~~Provide appropriate areas of green and open space;~~ [Duplicates Criterion 7 of Development Principles]

- xvi) **If proved necessary by the approved flooding and drainage scheme**, a Wetland Park within and to the north of the North-Western parcel to deliver flood water attenuation and new wetland habitat, allowing for informal recreation via a network of footpaths and boardwalks;
- ~~xvii) Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1; .[Duplicates first sentence of strategic Infrastructure as suggested to be amended]~~
- xviii) Provision of appropriate water supply and access to wastewater treatment facilities, inclusion of conservation and control through use of Sustainable Drainage Systems, and the contribution to an overall flood risk reduction in accordance with policies EN 24, EN 25, and EN 26; and provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
- ~~xix) To provide compensatory improvements to the Green Belt;~~
- ~~xx) Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD). [Duplicate of Criterion 13 of Development Principles]~~