



**Paddock Wood Town Council**  
**Comments on TWLP008 (The Role of the Strategic Sites Working Group)**  
**11<sup>th</sup> March 2022**

TWBC states at Paragraph 2 that:

*“All members have agreed to work positively and proactively in moving the sites forward (albeit, notwithstanding an ‘in principle’ objection to the growth in Capel parish held by both Capel Parish Council, and from his appointment as Ward Member for Capel in May 2021, Cllr Patterson).”*

However, TWBC omits the fact that PWTC also objected in principle to the growth at Paddock Wood due to the lack of a clear infrastructure and surface water management plan.

TWBC states at Paragraph 12 that:

*“To confirm, from the outset it was agreed by all Members of the SSWG that meetings minutes should remain private and confidential. To facilitate open discussions, there may be occasions where developers are encouraged to relay information which is commercially sensitive. Minutes could be shared to anyone within the organisation in line with these terms. Alongside these confidential minutes, the Council have provided agreed summary notes for organisations to circulate more widely if appropriate.”*

PWTC were not asked to agree that meeting minutes should remain private and confidential, they were told by TWBC that the information contained within the minutes was confidential due to sensitivity.

If TWBC considered the full contents of the SSWG meetings to be of such high confidentiality and sensitivity that it would not publish for the community to see, how can it conclude in the matter of a few days following the hearings that none of the content is confidential and sensitive? It is extremely disappointing to the Town Council that they were required to not speak about or publish the details of the SSWG meetings when the discussions were clearly of great importance to the future of the local community.

TWBC’s statement (Appendix 2) includes a ‘Schedule of (SSWG) meeting which have taken place since June 2021’. Why does this schedule only start in June 2021 when the SSWG started meeting in July 2019 – there are nearly two years missing from the programme?

What TWBC’s statement does not explain is the number of scheduled SSWG meetings that were cancelled over the years or the delay in circulating minutes following meetings (which was sometimes many months between meetings and minutes being circulated).

The Inspector will have received Paddock Wood Town Council's (PWTC) comments on the Stage 1 Hearings including PWTC's comments on the Strategic Sites Working Group and the Masterplanning exercise at Paddock Wood. We consider it relevant and appropriate to provide these comments again to TWBC's further note on the SSWG:

- If the draft Local Plan was ready to go out for Regulation 18 Consultation on September/November 2019 how can TWBC argue that the SSWG meetings contributed in any way to DtC as the proposed development sites were already identified and proposed for allocation by that point in time?
- The Town Council considers that in view of this the SSWG cannot be viewed as contributing to a primary stage of DtC, although they can be seen as part of a dialogue. There is however no paper trail provided to demonstrate actual evidence of a transparent DtC process prior to the Autumn of 2019.
- Regarding the minutes for the Strategic Sites Working Group (SSWG) the Town Council does publish the summaries on its website please see the link here: <https://paddockwood-tc.gov.uk/documents/strategic-sites-working-group-meetings/>. The summary notes were provided by TWBC, and came out a long while after the meeting and in the view of the Town Council often failed to match the notes taken by attendees at the meetings. Full minutes when they came, usually just before a next meeting, were confidential and the Town Council were only permitted to share the summaries with residents.

For example:

- The first SSWG Meeting was held on 18<sup>th</sup> July 2019: No record of meeting released for the public.
  - 4<sup>th</sup> September 2019 Meeting: Minutes were received by the Chairman of PWTC on 20<sup>th</sup> May 2020. Given that the Draft Local Plan was now publicly available (attached to reports to Planning and Transportation Cabinet Advisory Board, and Cabinet) there were questions raised, clarification sought, and discussions held regarding different aspects of the policies in the Draft Local Plan. TWBC explained that it had given significant consideration to different approaches to procuring masterplanning work, had taken advice from external organisations, and had made a clear decision that TWBC would lead on the commissioning of the team/consultancies for overall infrastructure masterplan and relevant frameworks/masterplans for land at east Capel and Paddock Wood.
  - 2<sup>nd</sup> October 2019: Meeting cancelled
  - 4<sup>th</sup> November 2019: Meeting cancelled
  - 4<sup>th</sup> December 2019: TWBC confirmed September minutes had not yet been produced or finalised. Minutes of the December meeting were received by the Chairman of PWTC on 20<sup>th</sup> May 2020
  - 5<sup>th</sup> February 2020: Minutes and summary received by the Chairman of PWTC on 20<sup>th</sup> May 2020
  - 4<sup>th</sup> March 2020: minutes and summary received by the Chairman of PWTC on 20<sup>th</sup> May 2020
- Therefore, the Town Council was not able to share any information about the strategic sites meetings until after 20<sup>th</sup> May 2020. This is particularly important as

the minutes of the early meetings only provide an overview of the issues discussed rather than an accurate record of the meetings.

- The SSWG Meetings appeared, to the Town Council, to be a 'tick box exercise' as it appeared that many decisions had been taken before the meeting without the opportunity for discussion of key issues.
- The Town Council was involved in one masterplanning event for the strategic sites. This included Capel & Paddock Wood Councils and was carefully planned by TWBC with pre planned questions covering specific issues only. If discussion moved off planned topics, it was soon brought back on track so there was no chance to ask probing questions or introduce contentious issues.

To summarise, the Town Council's experience of the SSWG meetings, the masterplanning exercise and overall approach from TWBC is quite different from that described by TWBC at the hearings. As explained above, the SSWG and masterplanning exercise have never felt like genuine cooperation or a transparent process to the Town Council and instead were 'tick box' exercises to attempt to demonstrate on paper that TWBC has been cooperating and engaging. The outcome of this has been a Local Plan that has not bottomed out the most critical issues of addressing key environmental issues and infrastructure delivery for its most significant location of growth.

And in any case, all these events took place after the sites had been proposed for allocation and therefore any TWBC activities cannot be viewed as having influenced the location or planning for development through a strategic cross boundary approach.