

Paddock Wood Town Council
Matter 4 – The Strategy for Paddock Wood

These representations refer to a number of pieces of important evidence base documents that are anticipated for publication by TWBC alongside the publication of its Hearing Statements. We request that these are published as soon as practicable to give respondents adequate time to consider the contents of the evidence ahead of the hearings.

ISSUE 1 – Flooding and Flood Risk

Q1. In seeking to apply the sequential test and avoid areas at risk of flooding, did the Council look at any alternative strategies for Paddock Wood, such as different sites and/or site areas?

PWTC Response:

1. As the Town Council has set out in its representations since 2021, TWBC has not considered alternative strategies for Paddock Wood for development within and around Paddock Wood or elsewhere in the Borough (see PWTC's various responses to the Council's Sustainability Appraisal evidence). This is even despite the Council now finding itself unable to meet its 5, 10 or 15 year housing requirement as a result of the Inspector's Initial Findings Letter (November 2022).
2. Where is the Council's sequential test for its latest masterplanning exercise for Paddock Wood? This does not appear to have been undertaken – it is not even possible to ascertain from the masterplanning work where exactly the flood zones are in relation to each proposed area of development or by use (housing, employment, education, open space, roads etc). This is a significant failing and should raise serious doubts as to the Council's transparency and clarity around masterplanning for growth at Paddock Wood which is a very sensitive area for development as has been established through this examination.
3. PWTC has previously raised the need for an 'exception test' as required by the NPPF where it is not possible for development to be located in areas within a lower risk of flooding (taking into account wider sustainable development objectives). The NPPF explains that the need for an exception test will depend on the potential vulnerability of the site and of the development proposed in line with the Flood Risk Vulnerability Classification in Annex 3 of the NPPF (Paragraph 163).
4. We highlight reference to 'the site' above as the Local Plan proposes one 'strategic site' at Paddock Wood and that site is clearly vulnerable to flood risk. We have also

heard about the 'masterplan areas' at Paddock Wood so it would be very useful and likely a requirement that the Council clearly sets out that flood risk is being addressed as 'a whole' in terms of Paddock Wood with each of the masterplan areas undertaking an exception test in line with the NPPF.

5. The NPPF explains (Paragraphs 164-165) that to pass the exception test it should be demonstrated that both elements of the exception test should be satisfied for development to be allocated or permitted:
 - a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
6. An inherent flaw with a potential 'early review' due to the Council claiming that it cannot meet its housing requirement and that an 'early review' is the remedy is in relation to the Sequential Test. If the 'early review' does result in new sites and areas being identified, these will need to go through the Sequential Test as required by the NPPF in order to steer new development to areas with the lowest risk of flooding from any source. How will Paddock Wood be considered as part of that Local Plan Review Sequential Test given that (assuming Paddock Wood is allocated as part of the current Local Plan) strategic growth at Paddock Wood is still part of the Local Plan and strategy?
7. There are a number of points regarding flood risk that the Town Council would like to highlight in addition to its points already submitted previously:
 - i. The development at Swatlands to the north of Paddock Wood has been approved by TWBC (despite being part of this unadopted Local Plan) despite it being located on what is currently functional flood plain which has protected the hamlet at the northeastern part of the site. These homes currently experience flooding and the Local Plan's proposals for Paddock Wood are likely to increase the flooding issues here which has not been taken into consideration in the Council's evidence.
 - ii. The proposed 'five islands' of housing surrounded by high flood risk zones proposed in the revised masterplanning does not create a community and lack coherence with the main body of the town.
 - iii. In the southeast of the Western Parcel, proposed for development is in an area that currently floods for a large part of the winter and takes the overspill from the Gravelly Way stream which forms the border of Paddock Wood. Further upstream behind Bramley, Laxton & Ribstone Gardens there is regular flooding of gardens from the Gravelly Way. North of the railway to where the Gravelly Way joins the Tudeley Brook there is a small

collection of houses, which flood during heavy rainfall - additional drainage into these two streams could make the situation worse. Where the stream goes under the railway line there is a grill which is not maintained by Network Rail - it is regularly cleared by residents of Bramley, Laxton & Ribstone Gardens to prevent serious flooding.

- iv. The 2015 Kent County Council Paddock Wood Flood Alleviation Study (2015)¹ shows Eastlands on the front cover - this area regularly floods with heavy rainfall. Importantly, this document shows the extent of surface water flooding (Fig 3.1). Interestingly, TWBC have allowed building on the Church Farm site to the east and 3 attenuation ponds have been built along the railway, to which Network Rail strongly objected but they still permitted the housing. We have yet to see the consequences as this area at the back is not yet built out (these are the extra houses approved).



Kent County Council
Paddock Wood Flood Alleviation Study
Paddock Wood Flood Alleviation Study



Figure 1: KCC Paddock Wood Flood Alleviation Study, Front Cover photo of Eastlands

¹ https://www.kent.gov.uk/_data/assets/pdf_file/0004/35455/Paddock-Wood-SWMP-stage-2-report.pdf

- v. There was previously a policy for no building along the edge of the Whetsted Road to maintain the green edge to these developments and maintain the landscape.
8. PWTC has made representations on wastewater issues in Paddock Wood in its previous submissions, yet these matters do not appear to have been thoroughly discussed or examined. See our most recent response in our February 2024 representations. There are serious pressures on the existing sewage system in Paddock Wood with the treatment plant being at capacity with the pumps at capacity and there are no plans to increase treatment work capacity. This remains a key strategic 'showstopper' for development at Paddock Wood and therefore the whole Local Plan. With no updated IDP or supporting evidence on this matter it has simply been ignored by TWBC as a strategic issue to be addressed. Clearly without wastewater treatment infrastructure investment and increased capacity, development cannot go ahead.

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?

PWTC Response:

9. Please see our representations to the Consultation on the Council's Response to the Inspector's Initial Findings (February 2024). These representations along with our response above provides the Town Council's response to this question. Simply put, the Council's Master Planning Addendum is not a sound basis on which to base the Local Plan and the proposed allocation at Paddock Wood.

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

PWTC Response:

10. As we have set out repeatedly, the strategy and proposals at Paddock Wood are not based on sound evidence, an effective process and there is no evidence to demonstrate how strategic growth can be coordinated and delivered at Paddock Wood.
11. An up-to-date IDP is required which is based on an actual delivery strategy at Paddock Wood which sets out the phasing of each of the masterplanning areas, when all of the infrastructure will be delivered, by whom, the costs (verified by an independent cost consultant) and the funding mechanism. This of course needs to take account of all of the stages of the planning process. In terms of flood risk mitigation and

wastewater infrastructure improvements, this evidence is critical to the Local Plan and should be seen as a 'showstopper' if such evidence is not provided.

12. As set out above, it is not a matter of simply making Main Modifications to make the Plan sound – there is not the evidence to justify the development as proposed in the first place.

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?

PWTC Response:

13. TWBC will need to answer this question and the Town Council looks forward to hearing its response and responding as needed.
14. At a recent planning training session held by Kent Association of Local Councils (KALC), the Town Council were told that for each dwelling 0.28 primary school places and 0.2 secondary school places are required.
15. Based on the existing development in progress at Paddock Wood it was concluded that Paddock Wood needed an additional 336 primary and 240 secondary school places.
16. The planned primary school has not been built although the land is still allocated. KCC's position, as we understand it, is that the school is not required. This is in stark contrast to what the Town Council hears from local residents who struggle to secure a local primary school place.

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?

PWTC Response:

17. We heard at the Local Plan hearings last week that a Feasibility Report is being prepared but that it has not been completed but that it will be ready to share soon. The Town Council reserves its position in relation to this report because clearly the Town Council has not seen it yet. There is no evidence which considers the merits of

each option let alone the deliverability of each option (see comments in relation to the IDP).

18. Further to this point, the Town Council has not been invited to be involved in this report, however we heard at the last week's hearings that the developer(s) have been closely involved. This appears to be a rather closed process to a statutory consultee (Town Council) and the Town Council would have been a valuable contributor to this report and process.

19. In addition to its concerns regarding a new secondary school, the Town Council has concerns with the potential expansion of Mascalls Academy. One of its key concerns is regarding the existing and proposed size of the school. The school already has an enrolment of 1,450 students.

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?

PWTC Response:

20. There does not appear have been any real testing or rationale for the location of the secondary school. There has been no assessment of different options (nor engagement with the Town Council on these), with the locational requirements for the school essentially ben considered first and then the location of sports provision determined following this. The Town Council questions why alternatives have not been considered and assessed.

21. Further to our points above in relation to flood risk it is unclear from the mapping and masterplanning what flood zone(s) the safeguarded secondary school lies in – this needs to be provided by the Council and the NPPF flood tests applied.

22. The NPPF classifies 'educational establishments' as 'more vulnerable' in its Flood Risk vulnerability classification (Annex 3 of the NPPF), this is the same classification as dwellings so the same test will apply as for the proposed housing at Paddock Wood.

23. It is unclear from the Council's evidence how the sustainability of this proposed location for a secondary school has been tested – how will pupils from Paddock Wood and the surrounding area access the school sustainably given that it is not particularly well integrated into the scheme geographically.

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?

PWTC Response:

24. Please see our responses above including in relation to the Feasibility Study and lack of an up-to-date IDP.
25. One of the key issues for Mascalls Academy is that children come from a wide catchment area including Cranbrook, Staplehurst & Marden (Maidstone Borough), Wateringbury, Mereworth & East Peckham (Tonbridge & Malling).
26. With growth in housing in these areas there will be increased pressure on Mascalls Academy in addition to that occurring just in Paddock Wood.
27. As stated in our previous representations, TWBC appears to have not considered a new secondary outside of the Borough working together with Maidstone BC and Tonbridge and Malling BC. The local authorities could work together to, for example, deliver a school to the northeast of Paddock Wood in Maidstone Borough with a catchment area including all three Boroughs.
28. The map of existing secondary school provision highlights the dearth of secondary school provision in this part of Kent and the remoteness of Paddock Wood services compared to Royal Tunbridge Wells and Tonbridge.

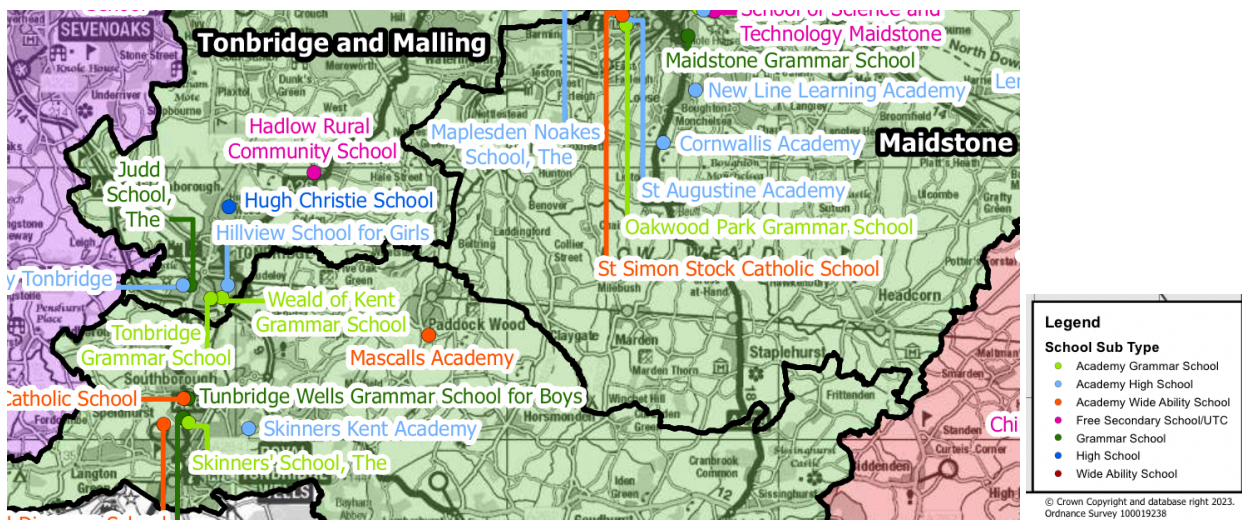


Figure 2: Existing Secondary School Provision https://www.kelsi.org.uk/__data/assets/pdf_file/0004/27463/Kent-Secondary-Schools-by-District_A3.pdf

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?

PWTC Response:

29. As far as the Town Council is aware the evidence setting out the projected requirement for sports and leisure facilities as a result of the suggested changes to the Plan has not been updated and provided by the Council.

30. This is clearly required and the Town Council would like the opportunity to review and comment on whether it reflects the existing provision in the parish and what it considers the requirements are from a local perspective in terms both qualitatively and quantitatively.

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

PWTC Response:

31. Based on TWBC's Hearing Statement to Matter 3 (The Strategy for Tudeley Village – Issue 3 Wider Infrastructure Provision) the Council plans for:

- an upgrading of the existing indoor facilities at Putlands Sports and Leisure Centre (including the potential for a swimming pool),
- new outdoor provision provided by a mix of a new location within the south western parcel and intensification of existing sites.

32. This is a very vague statement and does not provide any confidence that the Council has a clear strategy for how it will make adequate provision for sports and leisure in Paddock Wood and crucially it does not link back to evidence of need.

33. The Paddock Wood Neighbourhood Plan plans for Putlands to be redeveloped for indoor sports and a swimming pool. There has been no communication from the Borough Council about this until the plan was drafted. When the draft was published locations of sports facilities in Paddock Wood were inaccurate. There had been no discussion with PWTC and residents to discuss plans already in place (extend skate park on Putlands Field) or to include ideas from local residents.

34. The town needs a swimming pool - swimming lessons are part of the requirement for the primary school national curriculum which states that every child should leave primary school with swimming and water safety skills.



(<https://www.swimming.org/schools/swimming-national-curriculum/>)

35. Parents in the parish have stated that not all children at Paddock Wood Primary receive swimming lessons because of limited pool access.
36. TWBC's proposals for a stand-alone swimming pool would not be financially viable - there is a need for additional facilities on site in order to enable its viability. Therefore, Green Lane would not be a suitable location. Development for sports use on Green Lane would be problematic due to the terrain and a large, with a TPO being located in the middle of the field. There are also reported to be large pipes running under this site.
37. The Neighbourhood Plan identified a site for an outdoor sports hub, where field sports could be co-located to improve maintenance of the pitches. This site had good access for cars without driving through the town and access could be opened to Whetsted Road. It is close to walking routes from the town and railway station and allows for walking, cycling and bus access. This area is currently allocated to new schools however there is space to have the outdoor sports hub co-located with the schools creating combined sports facilities with 3G pitch and courts for tennis as well as football, rugby and cricket.
38. Approximately £900k of S106 monies were allocated for Putlands from the current developments – these contributions could be combined with contributions from the proposed developments in the new Local Plan to deliver these facilities.
39. Currently many residents must leave Paddock Wood for sports facilities due to the facilities at Putlands not being well maintained by the Borough's provider. Existing football and rugby teams cannot expand due to the limited pitches, despite demand. In short, sports facilities do not meet current need, with expansion required now. Further development will increase this need further.

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?

PWTC Response:

40. As explained in the hearings, the Town Council does not understand the Council’s reasoning here. It seems to rely entirely on the David Lock masterplanning with very little consideration or evidence given.

41. This is a key issue for the Town Council and the future of the Town, and it wishes for the opportunity to respond to any evidence prepared by TWBC as part of this examination.

42. Given that the Local Plan and masterplanning effectively do not provide any benefits to the Town or Town Centre the Sports Hub is the one opportunity to provide community infrastructure that can improve the quality of life of the residents of Paddock Wood.

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?

PWTC Response:

43. See PWTC’s response above in relation to this question. This is not clear or evidenced by the Council.

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?

PWTC Response:

44. As far as the Town Council is aware these feasibility studies have not been prepared to demonstrate if they can be upgraded in the manner proposed and to determine if they are developable.

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?

PWTC Response:

45. As discussed at last week’s hearings it appears that the updated transport model (Strategic Transport Assessment – Modelling Appraisal 18th April 2024) includes a new method for determining modal shift and its impact on the network. The Council’s consultants explained that there are specific sustainable transport measures / interventions to the local infrastructure assumed in the model to enable modal shift to take place. These modal shift assumptions and specific projects have not been published so it is not possible to comment on it however we understand it will be published and Town Council is keen to review and comment on it – we therefore reserve our position on this matter until we have seen this evidence.
46. The Modelling Appraisal shows that there are capacity issues even if their modal shift is achieved. See below which shows the B2017 Badsell Road link as being at ‘100’ capacity AM westbound and nearly at capacity PM eastbound. This points to issues at Five Oak Green even without Tudeley Village being in the Local Plan. We raised the point at the previous hearings that from Paddock Wood, Tonbridge Town Centre is closer than Tunbridge Wells Town Centre and that new residents of Paddock Wood are very likely to travel to Tonbridge Town Centre for services, facilities and employment particularly given that Paddock Wood is not well served by services and facilities – a point we have made repeatedly.
47. The table below is (as we understand it) making assumptions about sustainable and active travel improvements but we do not know what these are. We heard at the hearings that these improvements make assumptions about new residents using sustainable transport to Paddock Wood Station and taking the train to Tonbridge Town Centre.

B2017 Badsell Road (Five Oak Green)

Scenario	AM				PM			
	eastbound		westbound		eastbound		westbound	
	Demand	V/C	Demand	V/C	Demand	V/C	Demand	V/C
2018 Base	282	31	416	46	512	57	331	37
2038 Ref Case	455	51	615	68	644	72	405	45
2038 Local Plan Modal Shift (LPMS)	509	57	898	100	832	92	481	53

Figure 3: Strategic Transport Assessment – Modelling Appraisal (18th April 2024) Table 14: A228 and B2017 link capacity analysis

48. We question how realistic this and how likely most new residents will take a bus, cycle or walk to the railway station then take a train to Tonbridge rather than drive. Paddock Wood is at the centre of a rural area with many people relying on cars due

to no bus/train service in many settlements. Cycling is very difficult as roads are narrow and no cycle routes available to this area of the Borough. TWBC did previously have a cycle plan Paddock Wood which was a circular route around the town with no routes into the centre. It proved too difficult to deliver due to the width of the roads.

49. We also question whether the construction of the Colts Hill Bypass construction and therefore disruption has been taken into account in the Council's updated transport work. This construction will undoubtedly cause considerable disruption to the network and may well deter drivers from travelling to Tunbridge Wells for services and instead direct them to Tonbridge Town Centre.
50. PWTC has suggested to TWBC a road from east of Paddock Wood to north of the town to prevent all traffic coming into the town (a through route) however this was deemed not possible as it involved a railway bridge.
51. One of TWBCs suggestions to ease traffic in Paddock Wood was to close off the bridge except to buses. This would create havoc as vehicles from south of the town would have to travel along Badsell Road up Whetsted Road to Hop Farm and turn right to come back into Paddock Wood from the north and vice versa. It is not logical to close off the only road going through Paddock Wood. **Please can the Council confirm the current position on this previous idea?**

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

PWTC Response:

52. The Council explained at the hearings last week that cost of the Colts Hill Bypass (circa £7m) is based on Stantec's experience of other bypass schemes. This evidence has not been published and brings into serious doubt that the scheme has been properly costed. This evidence should be provided as part of the examination and reviewed for its robustness not least due to the costs of labour and materials most likely increasing since previous bypass schemes were delivered.
53. If the Colts Hill Bypass were deemed to be undeliverable or unnecessary the developer contributions earmarked for the Bypass could be used to make real place making improvements to Paddock Wood including improvements to the Town Centre which have been entirely overlooked in the Local Plan and Examination.

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?

PWTC Response:

54. TWBC's Colts Hill Bypass Green Belt Assessment (September 2023) (PS_051) makes a number of conclusions on the harm of delivering the bypass and suggests potential mitigation and alternative on-line improvements. We set these out below.

Inappropriate Development and Harm to the Green Belt

- *It is concluded that the proposed bypass would constitute inappropriate development. Its introduction would result a loss of openness within the site itself and would conflict with purposes of the Green Belt. It would result in harm to Green Belt Purposes, specifically Purpose 3 (safeguarding the countryside from encroachment).*
- *The site makes a Strong contribution to safeguarding the countryside from encroachment.*
- *There would be a loss of openness in an area of open countryside that is strongly distinct from the urban area.*

Potential Mitigation Measures

- *Potential mitigation measures could include the introduction of locally characteristic woodland belts along the boundary of the site, to help further reduce the visual impact of the road infrastructure and traffic on adjacent Green Belt land.*
- *In addition, sufficient land take would allow the proposed embankments and cuttings to be designed to fit with the prevailing undulating landscape.*
- *These measures would also help to reduce any potential visual impact and would help to integrate development into the landscape, in accordance with the landscape strategy for Landscape Character Area (LCA) 13 'Paddock Wood / Five Oak Green Low Weald Farmland' of the TWB LCA (2017).*

Alternative on-line improvements

- *On-line improvements to the A228 are a potential alternative to the construction of the proposed bypass. The on-line improvements would, like the proposed bypass, extend between the existing junction of the A228 and B2017 to the north and the existing junction of the A228 and Alders Road/Crittenden Road to the south. Works would entail a three to four metre widening of the eastern side of the carriageway and associated removal of vegetation which currently exists along this boundary. Some of this lies within the curtilage of a*

number of properties and would need to be the subject of a Compulsory Purchase Order (CPO).

- *The extent of change to the carriageway would be greater at the point of the junctions with Alders Road/Crittenden Road due to the change in levels and the requirement for embankments around the junctions.*
- *The Green Belt harm as a result of the alternative on-line improvements would be minimal. The changes would occur on the eastern edge of the Green Belt with the eastern carriageway of the A228 extending a small distance east beyond the current Green Belt boundary. Whilst there would be removal of some of the vegetation lining the eastern edge of the A228, which contributes to its function as a strong boundary feature, it is assumed that this would be replaced as part of the mitigation works. The A228 would therefore continue to form a strong Green Belt boundary in this location.*

Landscape and AONB

55. TWBC's Red, Amber, Green (RAG) Assessment Landscape and Visual Colt's Hill Bypass (PS_052) makes a number of recommendations and actions for TWBC in order to for the effects of the bypass and associated to be more fully assessed and understood as this RAG Assessment is simply a desktop analysis. These are outlined below, and it is unclear how these recommendations were considered by TWBC and whether this work was actually undertaken:

- *It is recommended that the northern section of the Colts Hill Bypass is reviewed against potential environmental effects, including those upon the setting of the High Weald Area of Outstanding Natural Beauty (HWAONB), and other landscape and visual receptors, to identify any potential adjustments to the route alignment which avoids adverse environmental effects as far as practicable, and which provides maximum opportunity for effective mitigation to reduce significant adverse effects.*
- *Relevant environmental topics, in addition to landscape and visual, which are recommended for the Preliminary Environmental Review and to inform the route alignment include: ecology / biodiversity, heritage, arboriculture and hydrology.*
- *It is recommended that a Preliminary Landscape and Visual Impact Assessment (LVIA), and a Concept Environmental Mitigation Design are prepared, and which would provide evidence for the selection of the final bypass alignment. Consideration of necessary structures that would be required, should also be part of the Preliminary Environmental Review.*
- *It is recommended that TWBC engage with KCC PROW to understand their view on the impact the Colts Hill Bypass may have on the directly affected PROW and surrounding PROW network.*

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

PWTC Response:

56. This was discussed at last week's hearings and the reasoning from TWBC was not clear.

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?

PWTC Response:

57. As already stated above, the evidence regarding modal shift is awaited from the Council.

58. TWBC states that in light of the Inspector's uncertainty regarding modal shift, that *"the level of 10% shift has been further considered"* and justifies this 10% by saying that *"the scale of new cycling routes, together with greater clarity on improved bus services, coupled with the establishment of internal route (and services) in line with 'walkable neighbourhood' principles should give greater confidence that the envisaged 10% modal shift away from cars is achievable. At the same time, there will inevitably be some doubts about such an assumption until in infrastructure is in place"*².

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?

PWTC Response:

59. This is not currently clear in the Local Plan. Critically the Local Plan does not state when improvements are required and there is no evidence to justify this is deliverable in any case.

² PS_053 paragraph 3.37

60. The growth to the east of Paddock Wood in the last plan period and that included in the new plan period make the addition of a road from the northeast of Paddock Wood to the A228 the most like highway infrastructure to improve movement around Paddock Wood.

ISSUE 5 – Viability and Infrastructure Provision

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

PWTC Response:

61. As we have set out repeatedly the IDP has not been updated and is a fundamental requirement that the Local Plan is supported by a robust IDP which is linked to the development proposals in the Local Plan.

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

PWTC Response:

62. There is no such evidence to demonstrate this and it is still unclear what the Council considers to be 'essential infrastructure' let alone whether it is viable or who pays.
63. Infrastructure previously promised by the Council and developers has not been delivered in Paddock Wood, therefore there are very low levels of confidence locally that the town will see the infrastructure required. This includes no additional GPs, schools, sports facilities, town centre improvements, adult education or young people's facilities. GP facilities are at breaking point – waiting times for non-urgent appointments are 2 to 4 weeks and urgent appointments are a up to 1 week.

ISSUE 6 – Employment Land

- Q1. What is the justification for the suggested changes to the Plan? As suggested to be modified, will the strategy for employment be justified and consistent with national planning policy?**

PWTC Response:

64. This is a matter for TWBC to respond to.

Q2. What are the implications for the provision of employment land? Will the Plan provide sufficient sites to meet needs over the plan period?

PWTC Response:

65. The Town Council questions why the employment allocations been reduced when there are limited jobs available locally for people in Paddock Wood?.

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?

PWTC Response:

66. The Inspector’s Initial Findings states the following:

“As submitted, there is insufficient detail on how the parcels will be delivered. The Plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives.” (Paragraph 41)

“One way of making the Plan sound might be to allocate each parcel for development, set out parameters for the scale, type and mix of uses permitted and then differentiate between the necessary on-site and shared infrastructure. The policy for each parcel could then include a requirement for phasing and infrastructure delivery, in addition to a requirement to accord with a town-wide framework masterplan (or other such document). This would allow individual schemes to progress, whilst ensuring a common objective on shared infrastructure. As part of any re-drafted policy, it will still be necessary to prevent piecemeal development and ensure that developers continue to work collaboratively, especially where connection between sites is required (such as across the railway line).” (Paragraph 42)

67. Despite the Inspector’s Findings, the proposed change by the Council is still not clear on how the Plan ties the component parts together to be effective. The phasing and delivery of infrastructure is not clear for each parcel or across the whole town / strategy. The common objective of ‘shared infrastructure’ and who pays for what when or even what these pieces of infrastructure are is unclear. Currently the Local Plan will result in piecemeal development and as there is nothing to ensure that developers will work collaboratively which will be absolutely critical to the success of any agreed masterplanning.

Q2. Is the suggested policy wording justified and effective?

PWTC Response:

68. See our response above - no the policy wording is not justified and not effective.

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?

PWTC Response:

69. It is notable that the Council has not updated its Green Belt Assessment in relation to the single largest development scheme in the Local Plan with the highest harm rating to the Green Belt.

70. Therefore, there is no real Green Belt assessment of the revised proposals and masterplanning at Paddock Wood in the evidence base and the most recent assessment was prepared in 2020.

71. It is not clear how this old assessment relates to the new masterplanning work or what mitigation measures have been used and what evidence used to inform the masterplanning.

72. For example, how has the proposed location of the large Secondary School in the northwest been reassessed in terms of its impact and harm to the Green Belt? How has the revised distribution of housing in Paddock Wood with its 'island development' approach linked by significant road infrastructure been assessed and what related mitigation measures are proposed as a result?

73. The David Lock Strategic Sites Addendum does not appear to make reference to Green Belt at all apart from its mention of Tudeley Village being recommended for removal from the Plan. This is a significant shortcoming when one considers that the Local Plan is proposing over 130 hectares of Green Belt release at Paddock Wood which is 'high harm' and 'moderate harm' to the Green Belt and this amount of land proposed for removal is unchanged from the submitted Local Plan despite housing being reduced by 1,000 dwellings, the Sports Hub being removed and employment allocations reduced.

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?

PWTC Response:

74. Firstly, the Submission Local Plan does not set out what the Council considers to be its exceptional circumstances to justify Green Belt release. This should be required. The reasons TWBC gives as justification for reasonable alternatives is set out in its Development Strategy Topic Paper (February 2021).
75. It first sets out what it considers to be the exceptional circumstances specific to the Borough. We highlight a number of key points that require closer inspection with our comments in bold:

*c) “Development requirements are higher than for previous Local Plans”.
We question what is exceptional about higher housing requirements as this is not unique to the Borough.*

*d) “Without the release of land currently located within the Green Belt, the Council will be unable to meet the identified development needs of the borough in a planned and integrated way, primarily for meeting the borough’s housing needs but also for employment uses and delivering a secondary school.” **As the examination has shown, the Council is unable to meet its housing needs and delivering a secondary school is very much in question.***

f) “All reasonable options to deliver development within the borough without releasing land in the Green Belt have been fully examined and utilised”

ii. Furthermore, the proposed Housing Density policy (Policy H2) requires that development should make efficient use of land.

iv. The opportunities for sustainable growth in the area outside the Green Belt (and AONB) have been maximised, with a notably high level of growth, relative to its size, at Horsmonden.

v. A significant number of site allocations are being made, in the AONB, including for some ‘major’ developments, which are also subject to their own ‘exceptional circumstances’ test. However, a conclusion has been reached, as elaborated upon in Part E, that there is no further capacity within the AONB to deliver additional development beyond that which is already being proposed.

As we, and others, have set out all reasonable alternatives have not been fully examined and utilised. In relation to the development

proposed at Paddock Wood the density of proposed development is extremely low. By our calculations there are 1,284 dwellings proposed in the Green Belt on 130 hectares of Green Belt land equates to a density of under 10 dwellings per hectare. This is not making an efficient use of land which currently has Green Belt protection.

76. The Council then states that there are additional site and development specific circumstances, which are considered to contribute to exceptional circumstances. For the sites at Capel and Paddock Wood these are set out below with our comment in bold:

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: approximately 48% of the total area of land included for the comprehensive urban extension is currently designated as Green Belt; **What is exceptional about the development being part of a wider non-Green Belt site? As we have set out multiple times Paddock Wood Town Centre has been virtually ignored in the Local Plan and in the Examination – saying that there is potential to rejuvenate and revitalise the town centre through releasing Green Belt cannot be substantiated based on the Council’s proposals for Paddock Wood. 48% of the land being in Green Belt at the point of submission for proposals which are now reduced by 1,000 dwellings, no Sports Hub and potentially no secondary school and reduced employment provision is not justified.***
- *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; **Given that the Local Plan appears to not be providing ‘betterment’ through reduced flood risk to the existing areas of Paddock Wood and its surrounds, the previous ‘significant contribution’ to exceptional circumstances completely falls away.***
- *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. **There is no evidence to suggest that expanding the town will result in the increased use of alternative modes of transport for local journeys and it is unclear what green infrastructure improvements there will be. This particular***

reasoning that “taken together with land at Tudeley there are opportunities to provide significant new highway infrastructure and localised highway improvements” also completely falls away with the removal of Tudeley from the Local Plan.

*The masterplans and detailed design process for Policies STR/SS1 and STR SS3 will create significant open spaces and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not unduly compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach. **As we have set out the masterplanning work does not provide this despite the Council’s claims. Where is the provision of compensatory improvements in the Plan?***

77. Based on the above, it is clear the Exceptional Circumstances have not been justified by the Council in relation to Green Belt release at Paddock Wood and East Capel.