

PADDOCK WOOD TOWN COUNCIL

FINAL

RESPONSE TO THE TUNBRIDGE WELLS BOROUGH LOCAL PLAN (REG. 18)

PREFACE

Paddock Wood Town Council (PWTC) thanks the borough council for staging the two local exhibitions and welcomes the opportunity to respond to the Plan.

Alongside other consultees, PWTC has had limited time in which to prepare its response.

The point is made at the outset that PWTC has not been able in the time available to study in the necessary depth all that is proposed in the Plan and, in particular, the supporting documents. The PWTC also notes further work is needed on the Plan. The Town Council's comments should be read in that light. PWTC will be looking to add to its representations at the next stage in Plan-making following what is hoped will be a meaningful and constructive dialogue with the LPA.

PWTC resolved on 11th November 2019 to OBJECT overall to the Plan.

Objection is made at three levels.

Firstly, objection is made in principle which reflects 3 underlying concerns -

a. the number and extent of existing problems that have and continue to affect the town i.e. before the planning/development at Mascalls Farm, Mascalls Court Farm and Church Farm and which, in the past, appear not to have been capable of redress through the parties involved on either an individual or collaborative basis.

The most prominent of these issues being –

i. fluvial flooding;

ii. surface and foul water drainage, and their interrelationship; and

iii. the vitality and viability of the town, including its small commercial centre, across the spectrum of uses including business, health, social, leisure etc. for the benefit of the wider community.

Nicholas Ide MRTPI, IDE Planning.
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b. that these problems will remain unaddressed, become worse or added to with the addition of 4000 new dwellings at Paddock Wood/eCapel, and (nearby) new settlement at Tudeley.

c. the loss of green belt and the need to preserve the setting of the town particularly to the west given the scale of development proposed at and around the proposed garden village at Tudeley within the Plan period and beyond.

Secondly, the objection identifies a number of cross cutting issues common to a number of policies. As these objections are relevant, in part or in whole, to more than one paragraph/policy/plan, they appear more than once in the representations and are shown in *italics*.

Thirdly, this response picks out individual policies where comment is made as appropriate – these are presented either as objections or as expressions of support.

The representations made by the Town Council have drawn upon a number of sources including a public exhibition held on 19th October 2019, from meetings of the Planning and Environment Committee and full Council during the consultation period, and specialist contributions, in particular, on flood risk.

IDE Planning on behalf of the Paddock Wood Town Council, 14th November 2019.

SCHEDULE

PARA., POLICY, PLAN ETC. REF.	SUBJECT	REPRESENTATION
Section 1	Introduction	
1.1-2	Plan purpose	<p><i>OBJECT</i></p> <p><i>1. The Plan is confined to the borough’s boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</i></p> <p><i>2. There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</i></p> <p><i>3. In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</i></p> <p><i>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</i></p> <p><i>ii. in view of the planned provision of development at Tudeley beyond 2036; and</i></p> <p><i>iii. to consider the possibility that development proposed at Paddock Wood/east Capel could similarly be <u>phased</u> over a longer time frame. This would allow for a reduction to be made in the allocations proposed under AL/PW1 – there is the additional point, in light of the physical constraints referred to elsewhere in Paddock Wood/east Capel, whether any <u>unmet need</u> in the borough could be more sustainably located within the Tonbridge and Malling and Maidstone boroughs under a jointly prepared Plan?</i></p>

	<p>4. For development to be <u>sustainable</u> there is a need to identify land for the right type of development, sites must be in the right place, and development must be supported by infrastructure.</p> <p>Borough wide, the allocations proposed for Paddock Wood/east Capel and Tudeley have been determined substantially on the basis of minimising the release of green belt and minimising the impact of development upon the AONB.</p> <p>Objection is made to the loss of <u>green belt</u> to the west of Paddock Wood to accommodate development at parcels 1, 2 and part of 3 under AL/PW1.</p> <p>All the housing sites identified in the Key Diagram and under AL/PW1 require <u>flood compensation</u>. Bringing forward development sites presently prone to flooding is arguably more contentious than releasing sites in the green belt or AONB given the costs involved (including the opportunity cost) and environmental impact i.e. given that with climate change the prospect is storage, attenuation and mitigation measures will need to be ‘topped up’ in future. Building upon the ‘wrong’ sites if, indeed, is what is proposed, is not sustainable - it absorbs developer contributions better put elsewhere and compromises the garden village ideal that underpins the strategy for Paddock Wood/east Capel.</p> <p>A Strategic Flood Risk Assessment (SFRA) 2019 underpins much of what is proposed for Paddock Wood/east Capel but this is considered to be an unreliable basis for doing so. An initial review of the SFRA raises questions concerning the period over which the SFRA was undertaken, how it tied in with the Sustainability Appraisal (in particular, in assessing alternative strategies), and how robust the SFRA is in terms of the data it has relied upon and the modelling undertaken. The absence of detail concerning flood storage, alleviation and mitigation measures raises fundamental doubts about the viability and deliverability of the strategy proposed for Paddock Wood/east Capel –</p> <p>a. the SFRA has been carried out on a borough wide basis. As the Plan has evolved, cross boundary issues have become more prominent. The impact of the strategy proposed at this stage, beyond the boroughs boundary, in flood risk terms, appears not to have been assessed;</p> <p>b. the SFRA has not carried out a Sequential Test (ST) of potential development sites (para. 13.2, Level 1 Report). If an ST has not been carried out borough wide, it cannot be said there are not other sites that are less prone to flooding, and which may be more suitable for development;</p>
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		<p><i>c. further to 'b', it is unclear at the moment what this means for the individual parcels identified for development under AL/PW1. For example, in the Level 2 Report, for parcel 1, it was noted by the borough council's consultants 'Parcel 1a is located in the path of an easterly flood flow route, which continues into Paddock Wood. During initial discussions with the council, it was agreed to position the residential area in this location (and therefore not following the sequential approach for placement of development)...' (Appendix I).</i></p> <p><i>d. Information in the SFRA provides insufficient detail to satisfy the requirements of the Exceptions Test (ET) for 'individual developments or groups of developments as part of a masterplanned or comprehensive development approach' (para. 1.4.1, Level 2);</i></p> <p><i>e. the Stage 2 SWMP for Paddock Wood noted that the town's susceptibility to flooding is influenced by the existing surface water network being at capacity (para. 2.4.2, Level 1 Report);</i></p> <p><i>f. the SFRA appears to have mixed up the Beult and the Bewl (Table 6-1, Level 1 Report). It is unclear if this is a typing error or, if intended, how this might affect the modelling undertaken by the consultants;</i></p> <p><i>g. It appears that the UMIDB has, at best, had only limited involvement in the preparation of the strategy;</i></p> <p><i>h. it is unclear as to how the existing/planned developments at Mascalls Farm, Mascalls Court Farm and Church Farm, and the proposed development of certain of the individual parcels under AL/PW1 will relate to one another.</i></p> <p><i>Detailed comment on the SFRA is supplied under separate cover.</i></p> <p><i>Comment on individual parcels under AL/PW1 follow. PWTC's concern is the extent to which the allocations made under that policy accord with the NPPF/PPG.</i></p>
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	<p>5. Whilst the LPA subscribes to <u>garden settlement principles</u> in guiding development at Paddock Wood/east Capel and Tudeley, it is unclear whether both places could be designated as garden villages and so benefit from assistance that the government's programme can provide.</p> <p>The Plan proposes <u>masterplanning</u> and <u>betterment</u> as a cure-all. When the planning, resource and coordination that is implied by this is compared, to take one example, with Homes England's garden community initiative in West Ifield (West Sussex), PWTC remains unconvinced that the borough council, despite its best intentions, has the capacity to deliver its strategy in its present form.</p> <p>6. Homes England suggests 'given its complexity, potential for infrastructure provision needed up front and long timeframe for delivery, <u>CIL</u> may not always be feasible or appropriate for a garden community scheme' (MHCLG Land Value Capture and Funding Delivery, 27th September 2019).</p> <p>7. The LPA's assessment of <u>housing need/provision</u> inflates housing numbers required over the Plan period which has a bearing upon the allocations proposed for Paddock Wood/east Capel.</p> <p>8. With regard the <u>distribution of housing</u> development, objection is made above under '4' above to the loss of green belt.</p> <p>It is considered there is more scope for development to be allocated elsewhere within the borough. For example, Cranbrook has escaped the development allocated in the SALP, whilst Hawkhurst (a smaller town in the Borough & the AONB) has seen considerable house building and is taking more houses than Cranbrook in the draft Local Plan. Why has Cranbrook not been allocated an increased share, when flooding is not a problem and the town centre is well established with schools that have capacity for increased student numbers? It is possible to build sympathetically within the AONB – other Boroughs have done this. It is also unclear whether some of the development proposed at Paddock Wood/east Capel could be more sustainably located at Tudeley.</p> <p>9. Questions arise concerning the identification, prioritisation and phasing of specific <u>infrastructure</u> schemes and hence the <u>deliverability</u> of the strategy. In respect of their prioritisation, more infrastructure may be critical and essential than desirable. Of particular concern is how critical many of the projects are, the magnitude of cost, the uncertainty concerning their phasing and the funding position overall. For example, the IDP lists the new Colts Hill bypass as being critical (p94), as needing to</p>
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		<p><i>be in place before sites come forward for development, yet the all-important policy STR1(2) refers to the bypass in terms of it being a potential scheme.</i></p> <p><i>Comment follows [below] on improvements required to the highway network to accommodate the development proposed. These improvements are needed to add to capacity locally and to mitigate impacts upon air quality.</i></p> <p><i>10. The <u>viability</u> of the Plan is unconfirmed – whilst the Stage 1 Viability Assessment says the consultant’s find reasonable viability prospects available borough-wide to support the Plan’s delivery, the viability of the larger/strategic site allocations has yet to be addressed in a Stage 2 assessment.</i></p>
1.38	Duty to cooperate	<i>OBJECT as above</i>
Section 2	Setting the Scene	
2.13-2.16	Sustainable development	<p><i>OBJECT</i></p> <p><i>1. The Plan is confined to the borough’s boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</i></p> <p><i>2. There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</i></p> <p><i>3. In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</i></p> <p><i>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</i></p> <p><i>ii. in view of the planned provision of development at Tudeley beyond 2036; and</i></p>

		<p><i>iii. to consider the possibility that development proposed at Paddock Wood/east Capel could similarly be <u>phased</u> over a longer time frame. This would allow for a reduction to be made in the allocations proposed under AL/PW1 – there is the additional point, in light of the physical constraints referred to elsewhere in Paddock Wood/east Capel, whether any <u>unmet need</u> in the borough could be more sustainably located within the Tonbridge and Malling and Maidstone boroughs under a jointly prepared Plan?</i></p> <p><i>4. For development to be <u>sustainable</u> there is a need to identify land for the right type of development, sites must be in the right place, and development must be supported by infrastructure.</i></p> <p><i>Borough wide, the allocations proposed for Paddock Wood/east Capel and Tudeley have been determined substantially on the basis of minimising the release of green belt and minimising the impact of development upon the AONB.</i></p> <p><i>Objection is made to the loss of <u>green belt</u> to the west of Paddock Wood to accommodate development at parcels 1, 2 and part of 3 under AL/PW1.</i></p> <p><i>All the housing sites identified in the Key Diagram and under AL/PW1 require <u>flood compensation</u>. Bringing forward development sites presently prone to flooding is arguably more contentious than releasing sites in the green belt or AONB given the costs involved (including the opportunity cost) and environmental impact i.e. given that with climate change the prospect is storage, attenuation and mitigation measures will need to be ‘topped up’ in future. Building upon the ‘wrong’ sites if, indeed, is what is proposed, is not sustainable - it absorbs developer contributions better put elsewhere and compromises the garden village ideal that underpins the strategy for Paddock Wood/east Capel.</i></p> <p><i>A Strategic Flood Risk Assessment (SFRA) 2019 underpins much of what is proposed for Paddock Wood/east Capel but this is considered to be an unreliable basis for doing so. An initial review of the SFRA raises questions concerning the period over which the SFRA was undertaken, how it tied in with the Sustainability Appraisal (in particular, in assessing alternative strategies), and how robust the SFRA is in terms of the data it has relied upon and the modelling undertaken. The absence of detail concerning flood storage, alleviation and mitigation measures raises fundamental doubts about the viability and deliverability of the strategy proposed for Paddock Wood/east Capel –</i></p>
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2.17-2.22	Infrastructure	<i>OBJECT as above</i>
Section 3	Vision and Objectives	
Page 31	Vision	<p><i>OBJECT</i></p> <p><i>1. The Plan is confined to the borough’s boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</i></p> <p><i>2. There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</i></p> <p><i>3. In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</i></p> <p><i>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</i></p>

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P32	Strategic objectives	<p>OBJECT</p> <p>The strategic objectives are borough wide; no indication is provided in the list as to their priority; whilst SO2 refers to the delivery of infrastructure, SO9 refers to the garden settlements (plural) and part of STR5(5) should be added to SO9 i.e. to say that new development at these settlements will only be supported if sufficient infrastructure capacity exists, or can be provided in time to serve the development.</p> <p>An objective should be added related to flood risk i.e. to protect people and property from flooding and to safeguard land from development that is required or likely to be required for current or future flood management.</p>
Section 4	The Development Strategy and Strategic Policies	

STR1	Development Strategy	<p>OBJECT</p> <p>1. The Plan is confined to the borough's boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</p> <p>2. There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</p> <p>3. In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</p> <p>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</p> <p>ii. in view of the planned provision of development at Tudeley beyond 2036; and</p> <p>iii. to consider the possibility that development proposed at Paddock Wood/east Capel could similarly be <u>phased</u> over a longer time frame. This would allow for a reduction to be made in the allocations proposed under AL/PW1 – there is the additional point, in light of the physical constraints referred to elsewhere in Paddock Wood/east Capel, whether any <u>unmet need</u> in the borough could be more sustainably located within the Tonbridge and Malling and Maidstone boroughs under a jointly prepared Plan?</p> <p>4. For development to be <u>sustainable</u> there is a need to identify land for the right type of development, sites must be in the right place, and development must be supported by infrastructure.</p> <p>Borough wide, the allocations proposed for Paddock Wood/east Capel and Tudeley have been determined substantially on the basis of minimising the release of green belt and minimising the impact of development upon the AONB.</p> <p>Objection is made to the loss of <u>green belt</u> to the west of Paddock Wood to accommodate development at parcels 1, 2 and part of 3 under AL/PW1.</p>
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		<p><i>All the housing sites identified in the Key Diagram and under AL/PW1 require <u>flood compensation</u>. Bringing forward development sites presently prone to flooding is arguably more contentious than releasing sites in the green belt or AONB given the costs involved (including the opportunity cost) and environmental impact i.e. given that with climate change the prospect is storage, attenuation and mitigation measures will need to be ‘topped up’ in future. Building upon the ‘wrong’ sites if, indeed, is what is proposed, is not sustainable - it absorbs developer contributions better put elsewhere and compromises the garden village ideal that underpins the strategy for Paddock Wood/east Capel.</i></p> <p><i>A Strategic Flood Risk Assessment (SFRA) 2019 underpins much of what is proposed for Paddock Wood/east Capel but this is considered to be an unreliable basis for doing so. An initial review of the SFRA raises questions concerning the period over which the SFRA was undertaken, how it tied in with the Sustainability Appraisal (in particular, in assessing alternative strategies), and how robust the SFRA is in terms of the data it has relied upon and the modelling undertaken. The absence of detail concerning flood storage, alleviation and mitigation measures raises fundamental doubts about the viability and deliverability of the strategy proposed for Paddock Wood/east Capel –</i></p> <p><i>a. the SFRA has been carried out on a borough wide basis. As the Plan has evolved, cross boundary issues have become more prominent. The impact of the strategy proposed at this stage, beyond the boroughs boundary, in flood risk terms, appears not to have been assessed;</i></p> <p><i>b. the SFRA has not carried out a Sequential Test (ST) of potential development sites (para. 13.2, Level 1 Report). If an ST has not been carried out borough wide, it cannot be said there are not other sites that are less prone to flooding, and which may be more suitable for development;</i></p> <p><i>c. further to ‘b’, it is unclear at the moment what this means for the individual parcels identified for development under AL/PW1. For example, in the Level 2 Report, for parcel 1, it was noted by the borough council’s consultants ‘Parcel 1a is located in the path of an easterly flood flow route, which continues into Paddock Wood. During initial discussions with the council, it was agreed to position the residential area in this location (and therefore not following the sequential approach for placement of development)...’ (Appendix I).</i></p>
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		<p><i>d. Information in the SFRA provides insufficient detail to satisfy the requirements of the Exceptions Test (ET) for ‘individual developments or groups of developments as part of a masterplanned or comprehensive development approach’ (para. 1.4.1, Level 2);</i></p> <p><i>e. the Stage 2 SWMP for Paddock Wood noted that the town’s susceptibility to flooding is influenced by the existing surface water network being at capacity (para. 2.4.2, Level 1 Report);</i></p> <p><i>f. the SFRA appears to have mixed up the Beult and the Bewl (Table 6-1, Level 1 Report). It is unclear if this is a typing error or, if intended, how this might affect the modelling undertaken by the consultants;</i></p> <p><i>g. It appears that the UMIDB has, at best, had only limited involvement in the preparation of the strategy;</i></p> <p><i>h. it is unclear as to how the existing/planned developments at Mascalls Farm, Mascalls Court Farm and Church Farm, and the proposed development of certain of the individual parcels under AL/PW1 will relate to one another.</i></p> <p><i>Detailed comment on the SFRA is supplied under separate cover.</i></p> <p><i>Comment on individual parcels under AL/PW1 follow. PWTC’s concern is the extent to which the allocations made under that policy accord with the NPPF/PPG.</i></p> <p><i>5. Whilst the LPA subscribes to <u>garden settlement principles</u> in guiding development at Paddock Wood/east Capel and Tudeley, it is unclear whether both places could be designated as garden villages and so benefit from assistance that the government’s programme can provide.</i></p> <p><i>The Plan proposes <u>masterplanning</u> and <u>betterment</u> as a cure-all. When the planning, resource and coordination that is implied by this is compared, to take one example, with Homes England’s garden community initiative in West Ifield (West Sussex), PWTC remains unconvinced that the borough council, despite its best intentions, has the capacity to deliver its strategy in its present form.</i></p>
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	<p>6. Homes England suggests 'given its complexity, potential for infrastructure provision needed up front and long timeframe for delivery, <u>CIL</u> may not always be feasible or appropriate for a garden community scheme' (MHCLG Land Value Capture and Funding Delivery, 27th September 2019).</p> <p>7. The LPA's assessment of <u>housing need/provision</u> inflates housing numbers required over the Plan period which has a bearing upon the allocations proposed for Paddock Wood/east Capel.</p> <p>8. With regard the <u>distribution of housing</u> development, objection is made above under '4' above to the loss of green belt.</p> <p><i>It is considered there is more scope for development to be allocated elsewhere within the borough. For example, Cranbrook has escaped the development allocated in the SALP, whilst Hawkhurst (a smaller town in the Borough & the AONB) has seen considerable house building and is taking more houses than Cranbrook in the draft Local Plan. Why has Cranbrook not been allocated an increased share, when flooding is not a problem and the town centre is well established with schools that have capacity for increased student numbers? It is possible to build sympathetically within the AONB – other Boroughs have done this. It is also unclear whether some of the development proposed at Paddock Wood/east Capel could be more sustainably located at Tudeley.</i></p> <p>9. Questions arise concerning the identification, prioritisation and phasing of specific <u>infrastructure</u> schemes and hence the <u>deliverability</u> of the strategy. In respect of their prioritisation, more infrastructure may be critical and essential than desirable. Of particular concern is how critical many of the projects are, the magnitude of cost, the uncertainty concerning their phasing and the funding position overall. For example, the IDP lists the new Colts Hill bypass as being critical (p94), as needing to be in place before sites come forward for development, yet the all-important policy STR1(2) refers to the bypass in terms of it being a potential scheme.</p> <p><i>Comment follows [below] on improvements required to the highway network to accommodate the development proposed. These improvements are needed to add to capacity locally and to mitigate impacts upon air quality.</i></p> <p>10. The <u>viability</u> of the Plan is unconfirmed – whilst the Stage 1 Viability Assessment says the consultant's find reasonable viability prospects available borough-wide to support the Plan's delivery, the viability of the larger/strategic site allocations has yet to be addressed in a Stage 2 assessment.</p>
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		<p>In addition –</p> <ul style="list-style-type: none"> • Policy STR 1: 2 – there needs to be clarity that the sports centre is an outdoor sports centre, as opposed to Putlands, which is an indoor sports hub which requires development, including a swimming pool.
STR2	Presumption in favour of sustainable development	SUPPORT
STR3	Masterplanning and compulsory purchase	SUPPORT in principle
STR4	Green Belt	<p><i>OBJECT as per STR1</i></p> <p>Objection is made to the proposed loss of green belt to the west of the town. Ref. paras. 4.47 to 4.52: it had previously been discussed that green belt would be allocated to the east of Paddock Wood to prevent coalescence in the east (with Marden, Horsmonden or Brenchley) – this is essential to prevent loss of the identity of the town and surrounding parishes and the protect the heritage and unique nature of small hamlets such as those at Old Hay & Pearsons Green. The principle of green wedges outlined in the Neighbourhood Plan are essential to retain the rural feel of the town.</p>
STR5	Essential Infrastructure and Connectivity	<p><i>OBJECT as per STR1</i></p> <p>In addition –</p> <ul style="list-style-type: none"> • The roads are already congested in the mornings particularly the main Maidstone Road through Paddock Wood. This is a B road only that is reduced to single carriageway width in places by parked cars. Adding an additional 4000 homes would significantly increase traffic through the town, even if some developments are accessed from the A228. The additional houses to the east would be served by narrow country roads, encouraging traffic through the town and over the single bridge over the railway to go north. This volume of housing would need a new road from the east of the town to the north to prevent congestion in the centre. A westward link via Eastlands is also required. There are plans to bypass Five Oak Green/Colts Hill, whilst there is no mention of a road to relieve the centre of Paddock Wood.

		<ul style="list-style-type: none"> • The railway is already at capacity & with additional houses being built downline at Headcorn, Staplehurst & Marden, there will be further overcrowding and travel difficulties – doubling the size of the town will make it impossible to get on to a train during traditional commuting hours. • The existing surface and foul water systems are inadequate, with frequent surface water flooding across the town and leakage of sewage onto roads and gardens – discussions are taking place with Southern Water but there is some reluctance on the part of Southern Water to commit to a fool proof solution to this problem. Additional building on the flood plain around Paddock Wood will exacerbate surface water flooding within the town centre as there will be less open space for water to run off into. Will the proposed Tudeley Village be serviced by PW or Tonbridge sewage treatment works – Paddock Wood WWTW will not cope with an additional 1800-2800 houses and the Station Road pumping station is barely able to cope with existing flows from PW and Five Oak Green/Capel.
STR6	Transport and Parking	<p><i>OBJECT as per STR1</i></p> <p>In addition, it is considered essential to have a road from east PW to the north; also for a westwards link via Eastlands.</p>
STR7	Place shaping and design	SUPPORT
STR8	The natural, built and historic environment	SUPPORT
STR9	Neighbourhood Plans	SUPPORT - PWTC as sponsor of the Paddock Wood NP is disappointed to note that the adopted Hawkhurst Neighbourhood Plan is disregarded in development planning, despite having been updated to address some concerns from the LPA. PWTC feels this undermines the whole of this policy and the value of NP's.
STR10	Limits to Built Development	<i>OBJECT as per STR1</i>

Section 5	Place Shaping policies	
STR/CA1	Capel strategy	<i>OBJECT as per STR/PW1 below</i>
AL/CA1	Tudeley	<i>OBJECT as per STR/PW1 below</i>
AL/CA3	Land at Capel (east) and Paddock Wood	<i>OBJECT as per STR/PW1 below</i>
STR/PW1	Strategy for Paddock Wood	<p><i>OBJECT</i></p> <p><i>1. The Plan is confined to the borough’s boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</i></p> <p><i>2. There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</i></p> <p><i>3. In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</i></p> <p><i>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</i></p> <p><i>ii. in view of the planned provision of development at Tudeley beyond 2036; and</i></p> <p><i>iii. to consider the possibility that development proposed at Paddock Wood/east Capel could similarly be <u>phased</u> over a longer time frame. This would allow for a reduction to be made in the allocations proposed under AL/PW1 – there is the additional point, in light of the physical constraints referred to elsewhere in Paddock Wood/east Capel, whether any <u>unmet need</u> in the borough could be more sustainably located within the Tonbridge and Malling and Maidstone boroughs under a jointly prepared Plan?</i></p>

	<p>4. For development to be <u>sustainable</u> there is a need to identify land for the right type of development, sites must be in the right place, and development must be supported by infrastructure.</p> <p>Borough wide, the allocations proposed for Paddock Wood/east Capel and Tudeley have been determined substantially on the basis of minimising the release of green belt and minimising the impact of development upon the AONB.</p> <p>Objection is made to the loss of <u>green belt</u> to the west of Paddock Wood to accommodate development at parcels 1, 2 and part of 3 under AL/PW1.</p> <p>All the housing sites identified in the Key Diagram and under AL/PW1 require <u>flood compensation</u>. Bringing forward development sites presently prone to flooding is arguably more contentious than releasing sites in the green belt or AONB given the costs involved (including the opportunity cost) and environmental impact i.e. given that with climate change the prospect is storage, attenuation and mitigation measures will need to be ‘topped up’ in future. Building upon the ‘wrong’ sites if, indeed, is what is proposed, is not sustainable - it absorbs developer contributions better put elsewhere and compromises the garden village ideal that underpins the strategy for Paddock Wood/east Capel.</p> <p>A Strategic Flood Risk Assessment (SFRA) 2019 underpins much of what is proposed for Paddock Wood/east Capel but this is considered to be an unreliable basis for doing so. An initial review of the SFRA raises questions concerning the period over which the SFRA was undertaken, how it tied in with the Sustainability Appraisal (in particular, in assessing alternative strategies), and how robust the SFRA is in terms of the data it has relied upon and the modelling undertaken. The absence of detail concerning flood storage, alleviation and mitigation measures raises fundamental doubts about the viability and deliverability of the strategy proposed for Paddock Wood/east Capel –</p> <p>a. the SFRA has been carried out on a borough wide basis. As the Plan has evolved, cross boundary issues have become more prominent. The impact of the strategy proposed at this stage, beyond the boroughs boundary, in flood risk terms, appears not to have been assessed;</p> <p>b. the SFRA has not carried out a Sequential Test (ST) of potential development sites (para. 13.2, Level 1 Report). If an ST has not been carried out borough wide, it cannot be said there are not other sites that are less prone to flooding, and which may be more suitable for development;</p>
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		<p><i>c. further to 'b', it is unclear at the moment what this means for the individual parcels identified for development under AL/PW1. For example, in the Level 2 Report, for parcel 1, it was noted by the borough council's consultants 'Parcel 1a is located in the path of an easterly flood flow route, which continues into Paddock Wood. During initial discussions with the council, it was agreed to position the residential area in this location (and therefore not following the sequential approach for placement of development)...' (Appendix I).</i></p> <p><i>d. Information in the SFRA provides insufficient detail to satisfy the requirements of the Exceptions Test (ET) for 'individual developments or groups of developments as part of a masterplanned or comprehensive development approach' (para. 1.4.1, Level 2);</i></p> <p><i>e. the Stage 2 SWMP for Paddock Wood noted that the town's susceptibility to flooding is influenced by the existing surface water network being at capacity (para. 2.4.2, Level 1 Report);</i></p> <p><i>f. the SFRA appears to have mixed up the Beult and the Bewl (Table 6-1, Level 1 Report). It is unclear if this is a typing error or, if intended, how this might affect the modelling undertaken by the consultants;</i></p> <p><i>g. It appears that the UMIDB has, at best, had only limited involvement in the preparation of the strategy;</i></p> <p><i>h. it is unclear as to how the existing/planned developments at Mascalls Farm, Mascalls Court Farm and Church Farm, and the proposed development of certain of the individual parcels under AL/PW1 will relate to one another.</i></p> <p><i>Detailed comment on the SFRA is supplied under separate cover.</i></p> <p><i>Comment on individual parcels under AL/PW1 follow. PWTC's concern is the extent to which the allocations made under that policy accord with the NPPF/PPG.</i></p>
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	<p>5. Whilst the LPA subscribes to <u>garden settlement principles</u> in guiding development at Paddock Wood/east Capel and Tudeley, it is unclear whether both places could be designated as garden villages and so benefit from assistance that the government's programme can provide.</p> <p>The Plan proposes <u>masterplanning</u> and <u>betterment</u> as a cure-all. When the planning, resource and coordination that is implied by this is compared, to take one example, with Homes England's garden community initiative in West Ifield (West Sussex), PWTC remains unconvinced that the borough council, despite its best intentions, has the capacity to deliver its strategy in its present form.</p> <p>6. Homes England suggests 'given its complexity, potential for infrastructure provision needed up front and long timeframe for delivery, <u>CIL</u> may not always be feasible or appropriate for a garden community scheme' (MHCLG Land Value Capture and Funding Delivery, 27th September 2019).</p> <p>7. The LPA's assessment of <u>housing need/provision</u> inflates housing numbers required over the Plan period which has a bearing upon the allocations proposed for Paddock Wood/east Capel.</p> <p>8. With regard the <u>distribution of housing</u> development, objection is made above under '4' above to the loss of green belt.</p> <p>It is considered there is more scope for development to be allocated elsewhere within the borough. For example, Cranbrook has escaped the development allocated in the SALP, whilst Hawkhurst (a smaller town in the Borough & the AONB) has seen considerable house building and is taking more houses than Cranbrook in the draft Local Plan. Why has Cranbrook not been allocated an increased share, when flooding is not a problem and the town centre is well established with schools that have capacity for increased student numbers? It is possible to build sympathetically within the AONB – other Boroughs have done this. It is also unclear whether some of the development proposed at Paddock Wood/east Capel could be more sustainably located at Tudeley.</p> <p>9. Questions arise concerning the identification, prioritisation and phasing of specific <u>infrastructure</u> schemes and hence the <u>deliverability</u> of the strategy. In respect of their prioritisation, more infrastructure may be critical and essential than desirable. Of particular concern is how critical many of the projects are, the magnitude of cost, the uncertainty concerning their phasing and the funding position overall. For example, the IDP lists the new Colts Hill bypass as being critical (p94), as needing to</p>
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		<p><i>be in place before sites come forward for development, yet the all-important policy STR1(2) refers to the bypass in terms of it being a potential scheme.</i></p> <p><i>Comment follows [below] on improvements required to the highway network to accommodate the development proposed. These improvements are needed to add to capacity locally and to mitigate impacts upon air quality.</i></p> <p><i>10. The <u>viability</u> of the Plan is unconfirmed – whilst the Stage 1 Viability Assessment says the consultant’s find reasonable viability prospects available borough-wide to support the Plan’s delivery, the viability of the larger/strategic site allocations has yet to be addressed in a Stage 2 assessment.</i></p> <p>In addition –</p> <p>Policy STR/PW1:</p> <p>1 – this explains a proportion of the 4000 dwelling allocation is to be provided within Paddock Wood. Reference is also made to Mascalls Court Farm, Mascalls Farm and Church Farm; it would be helpful in an appendix to set out expected housing numbers by site so clarifying how the overall figure is derived.</p> <p>3 – this should state outdoor sports hub.</p> <p>4 – TWBC is planning to put the bulk of housing in the next plan period in the areas of highest/most complex flood risk, as outlined in its 2017 document, Flood Risk to Communities in Tunbridge Wells. This will make building the houses expensive and reduce the likelihood of money being available for other infrastructure requirements in Paddock Wood.</p> <p>6 – what are the sites and windfall developments?</p> <p>Policy STR/PW1, Master planning & delivery</p> <p>2 – there is one brief mention of the need to deliver infrastructure related to foul and surface water – this needs to be stronger in the Plan</p> <p>Policy STR/PW1, Flooding – it is essential that consideration is given to the impact of one new development on existing town and all other proposed developments</p>
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		<p>Policy STR/PW1, Transport 3 – essential to have a road from east PW to the north, and a westwards link via Eastlands.</p> <p>Policy STR/PW1, Landscape 2 – the additional houses proposed on Mascalls Farm may be on the slope – needs to be avoided to avoid affecting view and to prevent surface water flooding to houses on flat area</p> <p>Policy STR/PW1, Infrastructure d – should read outdoor sports hub</p>
AL/PW1	Land at Capel (east) and Paddock Wood	<p><i>OBJECT as per STR/PW1 above</i></p> <p>This policy covers 12 parcels. For those that propose residential development, it would be helpful in an appendix to set out expected housing numbers by site so clarifying how the overall figure is arrived at. This to be read alongside housing development elsewhere including that at Mascalls Court Farm, Mascalls Farm and Church Farm.</p> <p>In addition -</p> <ul style="list-style-type: none"> • Could noise/green buffers be considered for the whole area? • There is a national shortage of GPs, impacting on practices across West Kent at the current time, with additional problems recruiting practice nurses. Doubling the size of the town will require another GP practice with 6 or more GPs and it is unclear where these will be recruited from. Similarly, hospitals would need to expand to accommodate a significant expansion in local population. There is no quick fix to the recruitment of healthcare staff, as a GP takes more than 8 years to train & numbers entering the training are falling. • Land should be allocated for a cemetery. • There is an aging population, but no apparent inclusion of additional adult social care provision e.g. residential care and nursing homes. There almost no facilities for elderly residents requiring residential and nursing care in the town and those people requiring nursing care have to be accommodated outside the town, separating them from family.

		<ul style="list-style-type: none"> • There are inadequate sports and recreation facilities, with proposals addressed by the Neighbourhood Plan, some of which have been included in the draft plan. The outdoor sports hub should be included within the boundary of Paddock Wood, in the area north of the railway which is be less suitable for housing as much of the area is in flood zone 3. • In response to flood risk, there are a number of overarching concerns – <ol style="list-style-type: none"> A. Confusion by the consultant, upon whom TWBC is reliant, to provide sound engineering advice. The main rivers Bewl and Beult are confused which potentially will provide the wrong river flow data used in the modelling for the SFRA documents. The rivers Bewl and Beult have entirely different flood, flow and catchment characteristics (the Beult is wide and flat; the Bewl is very short and graded). Bear in mind that these are “Final” issues of both reports, not a draft issue of either. TWBC clearly believes the information to be correct and accurate for it to be issued to the public domain in “Final” version. These final reports contain fundamental errors so both SFRA1 and 2 are not correct and accurate. B. NPPF/PPG Sequential or Exception Tests have not been applied. Neither have any comparable, alternative tools in assessing flood risk. This appears intentional. Lack of test application is clearly stated in each report by JBA (TWBC Consultant). C. Comparison of each land parcel on its own merits for flood resilience and then against the other land parcels identified, but NOT assessing any impact on existing residents in Paddock Wood. Indeed most of the parcels of land actually increase predicted flood depth – doesn’t that INCREASE flood risk, contrary to the NPPF/PPG? D. There is no apparent understanding by the SFRA1 and SFRA2 authors of the flood mechanisms affecting Paddock Wood. They are relying solely on the modelled effects of each parcel which is incorrect. E. There is no evidence of betterment being provided by bringing forward any of the land parcels for development to existing residents by REDUCING flood risk first and then deciding if new construction is possible.
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		<p>F. No confirmation or detail of any flood relief or attenuation measures in either report (SFRA1 or SFRA 2) that would enable the Land Parcels to be deemed suitable for development following provision of the same attenuation.</p> <p>G. Some of the proposals appear to be in breach of Riparian Law.</p> <p>In relation to specific parcels, comment is made as indicated firstly, in the generality and secondly, in specific response to the SFRA 2019 -</p> <p>Parcel 1: Whetsted Woods should be retained, as this area needs all the trees it can get to soak up the water. A significant proportion of this sector is in flood zone 3 with further areas in zone 2 – this would only be suitable for low density housing with considerable cost and creation of surface water management schemes, which may make it unprofitable for developers. Any housing built here should fit in with the surrounding area and should not be of high rise design, as this might be the temptation to fit the numbers in. There is a need to retain an attractive view of the town as visitors enter from the west. The Eastlands track running in this parcel and #3 and 4, should be upgraded to at least B road status – this is to relieve traffic that would otherwise run through town. Access from Maidstone Road, Paddock Wood should not be an option as this simply encourages more traffic through the single main road in the town. The public rights of way/cycle routes should link to the town centre, not the existing houses.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • There is an area used by the UMIDB pipe to the north east sector of the parcel for flow attenuation during a flood. This is a defence and MUST NOT be compromised. Any modelling for the parcel must show this. If JBA had consulted with the UMIDB, then this would be highlighted in this section of text. • Under Fluvial flooding (climate change) it is stated ‘When potential changes in flood flows due to climate change are considered (flow rates increased by 70% for the 1% AEP event), there is an increase in the extent of Flood Zone 3a, most notably in the west of the parcel’. It is unclear why the sequential test has not been applied. • How exactly will betterment be provided? TWBC must explain this. This is very far from clear.
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		<ul style="list-style-type: none"> • It is stated that when the residential area 1a was extended southwards to Badsell Road, increases in flood depth arose as a consequence of diversion of flood waters onto the B2017 south of the parcel. How is this justified? • The parcel is described as being currently undeveloped and there are no formal drainage systems in place. However, Tudeley Brook and the watercourse flowing along the eastern boundary of the parcel are maintained by the Upper Medway Internal Drainage Board. Tudeley Brook flows through the parcel in a northerly direction and there are a number of minor watercourses and drainage ditches flowing through the parcel - this appears to refer to Gravelly Ways. If 1a is to discharge to either the Tudeley Brook or Gravelly Ways, then the effectiveness is only as good as the grilles and culverts under the railway being kept clear by Network Rail. An existing problem could be amplified. • Residual risk at the parcel primarily concerns fluvial and surface water (rainfall) flood events occurring larger than those for which the parcel/development design has been developed – this is unquantified. • Flood risk in the northeast corner of the parcel is predicted to decrease, and flood depths are predicted to reduce by circa 0.25m across a large area of Paddock Wood northeast of the parcel as residential area 1a reduces the easterly flow of flood water – this too needs to be demonstrated. • It is stated that flood risk within the parcel increases, with changes in flood depth of up to +0.25m typically predicted through the open space areas, although a portion of land north of Badsell roads has changes in peak flood depths greater than this predicted. Increased flood depths extend a relatively short distance south of Badsell Road. North of the parcel, flood depths <i>across the railway line</i> [my emphasis – itself?!] are predicted to increase – reference is next made to land north of the railway ‘Flood depths and extents to the north of the railway line also increase, with increases in flood depths of up to 0.25m typically reported, although there are localised areas where the change in depths are greater’. • It is contended the proposed development at Parcel 1 has the greatest impacts on flood flow pathways and therefore depths in the SFRA area (due to residential area 1a). More localised
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		<p>changes in flood risk are apparent at and closer to other parcels, due to their specific impact on flood risk. However, this is in the context of no sequential testing.</p> <ul style="list-style-type: none"> • In considering influential factors on flood risk, what account has been taken of surface water flows from all of the new buildings? This will add to the flows needing to go through the Tudeley Brook and Gravelly Ways culverts. This increased volume will increase the flood risk if the Tudeley Brook Bridge and the Gravelly Ways trash screen are not kept clear unconditionally by Network Rail. There is no mention of this here. • Strategic storage measures appear not to have been defined in either SFRA 1 or 2? How can they be used to put the parcel forward when not defined anywhere in SFRA1 or 2? • Increased conveyance i.e. the effect of introducing new channels through the parcel 1 by increasing the existing channel capacity, is only feasible if they can discharge under the railway. • It is stated defences would potentially be located in the northeast corner of the parcel, further reducing the eastward flow of flood water into existing communities in Paddock Wood. The potential defence extends from residential area 1a to the railway line, and aims to reduce the risk of flood water along this eastward flow route. There is however no further detail. • It appears that without an upstream flood storage reservoir then the railway line will be flooded – the safety of the railway would otherwise be compromised. • It is noted there remains a localised increase in flood risk at the southern end of the parcel due to ‘reflection of flood water’, but this does not extend beyond the parcel, south of which reduced flood depths are predicted on the B2017. • Can the principle of development at the parcel be supported? It is stated substantive development at the parcel can be supported in principle , although delivery of the scale of development proposed will require formulation of more detailed analyses in a parcel specific FRA to validate the total area footprint area that is viable. • It is noted additional work is required to refine proposed development at the parcel and plausible delivery of flood risk management mitigation measures which are required to
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		<p>facilitate development at the parcel. The evidence base in terms of understanding flood flows, connectivity of drainage assets (both natural and man-made on and off parcel), and costs of flood risk management measures (operation and maintenance) and ownership/responsibilities will be key considerations – this is insufficient justification for the proposed allocation on flood risk grounds.</p> <p>Parcel 2: Whetsted Woods should be retained, as this area needs all the trees it can get to soak up the water. A significant proportion of this sector is in flood zones 2/3 – this would only be suitable for low density housing with considerable cost and creation of surface water management schemes, which may make it unprofitable for developers. Any housing built here should fit in with the surrounding area and should not be of high rise design, as this might be the temptation to fit the numbers in.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • Defences and flood risk management measures – it is stated there are no formal defences within or upstream of the parcel, but Leigh Flood Storage Area, located on the River Medway upstream of Tonbridge, acts to reduce the depth of flood water originating from the River Medway. For watercourses originating south of Paddock Wood, actual risk is aligned with the magnitude of events that inform the Flood Zones. For the River Medway, Leigh Flood Storage Area reduces flood extents and levels on the floodplain at the north of Paddock Wood and so actual flood risk is less than the risk presented in Flood Zones. However, there are MANY watercourses that flow uncontrolled into the Medway below the Leigh Barrier which itself is only designed to protect Tonbridge (Pen Stream, Hilden Brook, Bourne, etc). The Leigh scheme RMFRS should not be considered as a flood defence which provides any protection to Paddock Wood. The site is CERTAINLY within the affected area if the Leigh Reservoir were to fail though. The operation of the RMFRS is there to protect Tonbridge; as such this may not be in the best interests of Paddock Wood at the same time. • The southwest corner of proposed development 2a was tapered from the central watercourse through the parcel during an iteration of parcel layout testing to reduce the impact of the development on increasing flood risk. This was undertaken at the modellers (Engineers) discretion and is not in accordance with the NPPF which seeks to apply the Sequential Test to divert areas of development to zones of lower flood risk.
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		<ul style="list-style-type: none"> • There is no indication that the UMIDB is aware of these development proposals for the parcel. As such they may not be aware of any impending maintenance implication or need to increase their maintenance budget within the IDB to accommodate the parcel being progressed for development. • Summary of flood hazards – this fails to mention the information contained in the table listed on page 101 of SFRA1. This clearly states that the parcel is affected by any failure of the Leigh Barrier and the River Medway Flood Relief Scheme, which is omitted in the assessment of Land Parcel 2. This assessment of the parcel is therefore unsound. • Reservoir risk of failure – here it is acknowledged that only large areas to the north of the parcel are at risk of flooding from RMFRS failure. This is still not totally consistent with the table on page 101 of SFRA1. • The area is not protected by any formal or Main River flood defences but does flood, as either the current or previous owners of Tudeley Brook Farmhouse have installed/constructed earth banks around their property (these are private defences). It would appear that these defences have NOT been considered by this report or modelling therein for the parcel and therefore they have not been identified as being overrun in the event of a flood if the site were developed. This again is unacceptable and an omission. If they had consulted with the UMIDB these would be listed here. There is also an increase in predicted flood depth around Tudeley Brook Farmhouse with the proposal which will be detrimental to residents there. • There is no proof or evidence that the RMFRS will either reduce or prevent flooding in the parcel. The parcel floods as the flood water cannot discharge through a backed up drainage system to the River Medway to the north. Any infrastructure will need to demonstrate betterment for the area prior to implementation. • “Flood risk is predicted to increase in the area east of the parcel, with rises in flood depths of up to 0.25m immediately adjacent to the parcel and widespread increases between 0.001m and 0.05m across the north of Paddock Wood.” The development WILL INCREASE the risk of flooding to existing residents as stated in the analysis here. Development of the parcel is shown
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		<p>to increase flood depth (and hence flood risk with no betterment) to all areas of Paddock Wood (see “Mapping” section plan for details).</p> <ul style="list-style-type: none"> • Development of Parcel 1 causes parcel 2 to flood and parcel 3 also causes any benefit from parcel 2 to be removed; Parcel 4 causes an INCREASE in flood risk to Paddock Wood, but that is acceptable as the modellers deem this to occur over a smaller area. No betterment is provided. A general theme is that flood risk is increased elsewhere as a direct result of development of parcel 2. • There is an admission that flood waters will be directed in an easterly direction towards the existing settlement of Paddock Wood from the parcel. No details of any flood storage are given despite mention of some scheme compliant with the Reservoirs Act 1975 (this would be of large scale construction indeed). Assumptions are made within the modelling that have not been explained or adequately quantified (e.g. a new channel was introduced.....). Also if the defences upon which the modelling is based do not even exist (yet) or there is a degree of uncertainty as to if they can be built and there is a stated increase in flood risk, then this is a fundamental flaw in the whole process. • Infiltration solutions suggested – SuDS – will not work in a clay based catchment. <p>Parcel 3: Parcel 316 is allocated in the draft Neighbourhood Plan for an outdoor sports hub to accommodate all four football clubs, the rugby club and potentially tennis, netball and cricket. 316, 318 & 319 are often under water in the wet months of the year, so would not be suitable for residential properties, unless these were low density and considerable surface water management infrastructure was employed, which would be costly for developers. Much of this area is below the level of the B2160 as it leaves the main settlement of Paddock Wood. It is important to consider here any plans Maidstone Borough have to build near Beltring Station, as this may adversely affect flood mitigation features planned to protect Paddock Wood. The Head of Planning at Maidstone admitted that this was up for consideration. There is also rumoured expansion of the industrial area at the top end of the B2160 before the Hop Farm roundabout.</p> <p>SFRA –</p>
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		<ul style="list-style-type: none"> • The assumption that the RMFRS will reduce flooding in the parcel is wrong (see above). THE RMFRS WILL NOT REDUCE THE RISK OF FLOODING AS THE PRIMARY CAUSE IN THE PARCEL IS THAT FLOOD WATERS CANNOT DISCHARGE THROUGH THE SYSTEM TO THE MEDWAY IN SPATE. IT BACKS UP CAUSING FLOODING. THE FLOOD RISK IS NOT LESS THAN SHOWN IN THE FLOOD ZONES – <u>IT IS AN INCORRECT ASSUMPTION TO STATE OTHERWISE.</u> Indeed 75% of the land parcel is shown to be at risk in the assessment of the parcel from the failure of the SAME quoted reservoir. • Parcel 3 requires that Parcel 2 will store flood waters for a prolonged period; how will this work – and not cause flooding – during a prolonged event? • No consideration of any existing private defences in the assessment of the parcel, e.g. at Tudeley Brook Farm. • No Natural England input into selection of the parcel apparent, despite being in one of their zones of influence. • Parcel is acknowledged as increasing flood risk to other parts of Paddock Wood. • Noted increase in flood risk around Eastlands Lane. To quote improvements to the centre of Paddock Wood generated by the scheme appears to be incorrect. Due to local geography, topography and flood routing pathways, this cannot be right. • Parcel 3 development increases flood risk to the south east of the parcel. • A reliance has been placed on “strategic flood storage sites” which have not been detailed in either SFRA1 or SFRA2. Therefore such sites cannot be considered when assessing the parcel or undertaking modelling. <p>Parcel 4: Nursery Road is an area of significant regular flooding (last in August 2019) and would make developing this site difficult without significant improvement in surface water drainage. Additional traffic in this area would cause problems for existing residents, who currently experience overspill parking from Eldon Way. This could be improved by access from the Whetsted road, along the existing</p>
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		<p>farm track (if expanded). The plan for the Outdoor Sports Hub suggests opening this access to allow access from the Whetsted Road.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • There are no residential dwellings in Eldon Way. Fundamentally inaccurate statement. • Current flood risk is quite high with a 30% chance of 0.1 AEP being met or exceeded. • As there is no hard defence line between parcels 1, 2, 3 and 4, then parcels 1, 2 and 3 cannot also benefit from any defence or storage reservoir as there is free flow (i.e. no hard walls or defences) between any of the parcels stated. These are knock on effects which have not been considered. • Up to 250mm of acknowledged INCREASED flood risk to Eldon Way, so also Maidstone Road/Lucknow Road, Transfesa and Lambs Park will also suffer. • Combination of all parcels effects by and on Parcel 4 is unacceptable. • Again hypothetical channels adding in to the modelling but no basis or foundation is given for this alteration when considering the parcel. • Strategic storage again mentioned but not detailed as to what has been considered to make this parcel modelling “work”. • Parcel 4 on its own and with other parcels increases flood risk. There is no betterment generated by development of the same parcel 4. <p>Parcel 5: This site should not be used for housing, as it is well below the road level and regularly floods. Would only be suitable for employment development, which would make sense in terms of Maidstone Borough Council allowing expansion of the commercial development further north. Footpaths should be maintained and the rural communities of Lucks Lane, with listed buildings, have a character that would be lost from over development of this area. Lucks Lane itself is not suitable</p>
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		<p>for increased traffic movement and would need considerable work to widen and strengthen the carriageway if traffic was to increase in this area.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • Surrounding land use as described is incorrect. • North of Lucks Lane (the agricultural sale field) currently floods every winter and is situated much lower than the Maidstone Road. An IDB watercourse drains the parcel. No input from the UMIDB evident in the parcel assessment. • All of the parcel is acknowledged as being within Zone 3a, so how will it ever pass a Sequential Test let alone an Exception Test?? • Knock on effects to the existing residents in the flood sensitive area of Lucks Lane have not been assessed. • The summary of flood hazards is wrong. The site floods as water cannot discharge to the Medway in spate; the site DOES NOT flood as a result of flood water running off of the hills to the south of Paddock Wood. See point D at the start. This mechanism of flooding is not considered here. • Majority of the parcel is acknowledged as being in an area at risk of Reservoir failure (RMFRS). • Parcel is a Natural England SSSI Impact Risk Zone. No discussion with Natural England evident. • Parcel will increase local flood risk with no betterment for existing homes and businesses. • Proposed adjoining parcel 5 increases the modelled flood risk!
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		<ul style="list-style-type: none"> • The centre of Paddock Wood WILL NOT be protected by the parcel, as the parcel is downstream of the centre of Paddock Wood! This is fundamentally a wrong statement and casts doubt on the whole document. • To state that Parcel 1 works will benefit parcel 5 is nonsense. They are on different sides of the railway line for starters. • Some sort of flood defence is mentioned, but it is not detailed in type or scope. This cannot be relevant to determining the viability of the parcel for development. <p>Parcel 6: a specific allocation for expansion of the WWTW should be made; consideration must be given to safeguarding the rural character of the hamlets here – there is already considerable loss of character from building large farm/storage buildings close to these hamlets/listed buildings. It is not possible to see where any housing might go on this site (the allocation makes no reference in the Plan to residential development), especially in such close proximity to the sewage treatment works. Road access to this site would be difficult without a new road.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • The local network of drainage ditches relied upon to drain this parcel cannot be deemed to be effective for such new development. This has not been confirmed in any way by the Upper Medway Internal Drainage Board. Recent planning application correspondence has shown this inadequacy. • Incorrect RMFRS protection statement used again here. • Ground levels are proposed to be raised to permit development on the site. There is no confirmation that existing residents will not be affected adversely by such a suggestion. • Part of the parcel in the analysis is described as residential, when the parcel is potentially destined for non-residential use in the title. • Drainage from the parcel is destined for the Rhoden system. This is already accepting increased volumes of surface water from the Mascalls Court Farm (Persimmon) and Church Farm (Countryside) developments. These volumes have not been included in the modelling
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		<p>for the SFRA1 or 2 and should be. No consideration has been given to the effects of the parcel, the permitted developments and existing residents. THEREFORE THE MODELLING OF THIS PARCEL IS DEFICIENT AND CANNOT BE RELIED UPON. IT DOES NOT CONSIDER ALL THE FACTORS THAT MUST BE CONSIDERED. THIS MAKES THE MODELLING UNRELIABLE AND NOT FIT FOR PURPOSE. The outcomes of such all inclusive modelling MUST be communicated to the developers of other sites connecting to the same system(s).</p> <ul style="list-style-type: none"> • Parcel is deemed to be at risk from reservoir failure. There is a smaller developable area inside the parcel which is outside the modelled flood extents. • The rivers Beult and Bewl are confused again. Each have vastly different flow characteristics. • Flood risk is increased off site and elsewhere as a result of the proposal. • Development of the parcel potentially compromises expansion of the existing Paddock Wood Wastewater Treatment Works. • Flood risk in parcel 6 CANNOT be reduced by bringing forward development of parcel 1. There is a railway and town centre in the way. The defence mentioned is therefore irrelevant (north east corner of parcel 1). This will possibly only protect Bramley Gardens from the parcel 1 runoff. • Additional drainage channels have been added into the modelling, over and above those which are currently present on site. No information is given on these, or who will maintain them. <p>Parcel 7: Although this area can become very wet, it is largely south of the flood zones 2/3 and would make sense to build out this way if Church Farm development is to go ahead. However, there are still problems with surface water drainage and consideration of housing density would be needed. It would be important not to lose the character of existing rural communities/heritage sites, so development would need to complement these and not encroach on them.</p>
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		<p>In addition, land should be identified within this parcel for a new trunk sewer – it is uncertain whether Southern Water are taking this development into account in their modelling/long term financial planning.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • Parcel is within the UMIDB Internal Drainage District and there is no evidence of input from the UMIDB. Discharge from Mascalls Court Farm and Church Farm comes in further up the same system. There is also a large angling lake in the parcel that has not been considered. The Modelling outputs are therefore unsound. • Flood waters are acknowledged as being pushed off site by the parcel development, but where to is not given. This is an increase in flood risk elsewhere, most certainly to existing residents. Lucks Lane and Five Furlongs Park are the main recipients. • Development of the parcel is potentially detrimental to the safety of railway infrastructure. No consultation or mention of interaction with Network Rail is stated. • The parcel is NOT influenced by the River Beult in any way. This assertion is incorrect. • Significant increase in flood depths stated as a result of the parcel development. This is an unacceptable increase in flood risk. Increases in flood depths quoted are also close to existing dwellings. • Modelled flood depths increase around the perimeter of the parcel with development included – stated in the parcel analysis. • Flood depth reduction in the centre of Paddock Wood will not reduce the depth of flooding in parcel 7. • How will strategic storage reduce flooding caused any development of parcel 7, especially as the strategic storage has not been defined in the parcel analysis?
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		<ul style="list-style-type: none"> • Developments at Mascalls Farm and Church Farm have not been considered here, so how can it be confirmed that development of parcel 7 will reduce flood risk/create betterment in terms of flood risk to existing residents as a result of developing parcel 7? <p>Parcel 8: This should become a green buffer zone along the road to provide a green boundary to the town and protect hamlets and the ancient farmstead at the lower edge of this site along Pearsons Green Road.</p> <p>Parcel 9:</p> <p>SFRA –</p> <ul style="list-style-type: none"> • Surface water and flood discharge from the parcel increases flood risk – with no additional development in the parcel included. • The parcel must discharge through the Rhoden system, but no outflows from the Mascalls Court Farm or the Church Farm development have been considered in the flood modelling for parcel 9 on its own merits. • Existing areas of the site are affected by the 0.1% AEP event. • No consideration of extant planning consent to the west of the parcel (Mascalls Court Farm) included in the modelling or consideration of the parcel. • “There have been no specific flood instances reported from other sources within the parcel boundary” – really? Worth checking against PWTC records. • Parcel is affected by a rarer but greater magnitude event than a 0.1 AEP event BEFORE any development is considered. • “Parcel drainage arrangements should be developed so that exceedance pathways are designed into the development form enhancing management of flood water.” This is not correct. How will Dimmock Close/Ballard Way/Le Temple Road be affected by such pathways? They should receive betterment from any development.
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		<ul style="list-style-type: none"> • Surrounding areas are acknowledged as being at increased flood risk as a result of development of this parcel. • Development of the parcel will not result in betterment for existing residents. • Use of the Beult data and not the Bewl data undermines the whole modelling process for this parcel and indeed the SRFRA 1 and 2 reports. • No consideration of permitted developments or existing residents have been considered when modelling the parcel for acceptability for development. • Infiltration SuDS are not a feasible option in a clay geology such as Paddock Wood. <p>Parcel 10: Not submitted in call for sites – currently used as a sports field and is unusable during episodes of wet weather – unplayable for most of season 2017/18 due to water logging. Below road level along road side</p> <p>Parcel 11: This is a long way from the Town Centre, has a small collection of historic buildings and poor roads which would make it unsuitable for increased traffic.</p> <p>SFRA –</p> <ul style="list-style-type: none"> • Drainage of the site totally dependent upon Kent Highways keeping a culvert clear and in good order. Outside the remit of the parcel developer. No input from Kent Highways evident in the parcel analysis. • No consideration of the discharge effects from the parcel of those downstream. Flood risk to existing residents is thus increased. No consideration of existing permitted developments and cumulative effects of the proposed parcel have been considered. • Residual risk of flooding for areas immediately outside of the parcel have not been considered. • No appreciation of the downstream effects upon residents of Ballard Way/Dimmock Close/Le Temple Road undertaken. The mitigation measures for Church Farm do not include any
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		<p>consideration of the outflows from parcel 11 and so cannot be relied upon. They have not even been modelled.</p> <p>Parcel 12:</p> <p>SFRA –</p> <ul style="list-style-type: none"> • No consideration undertaken of the effects of any outflows upon the downstream mitigation measures already permitted by TWBC. This parcel outflows potentially may overwhelm such measures. No consideration given by the modelling undertaken by TWBC. • No confirmation given that development of the parcel will reduce any flood risk downstream of the same parcel.
AL/PW2	Paddock Wood Town Centre	<p>OBJECT</p> <p>The town centre does not offer sufficient facilities for the existing population, requiring people to travel out of town for most aspects of their social life. Redevelopment of the town centre is essential prior to any further housing allocations – this is a project which cannot be delayed until the latter end of the plan period, but needs to come at the beginning. The existing developments of 1,100 houses will put pressure on town centre facilities and should trigger the town centre development as laid out in the previous site allocations local plan.</p> <p>A master plan is proposed; development is intended to revitalise and regenerate the town. Elsewhere in the Plan, reference is made to the town centre being reconfigured and expanded but it is not apparent from the policy as drafted what is meant by this. Neither is it clear what is meant under clause ‘4’ where reference is made to residential development in the town centre as ‘contributing’ to the 4000 unit allocation. Reference is made below under ED11 on the overriding need to protect the primary shopping area as a commercial area. Also, any high density housing in the centre of Paddock Wood should not exceed the height of existing buildings in order to retain the character of the town centre.</p>
AL/PW3	Land at Mascalls Farm	OBJECT

		It is unclear how the additional 115 houses at Mascalls Farm has been arrived at and why this will not count against the 4000 allocation.
AL/PW4	Land at Memorial Field	SUPPORT
Section 6	Development Management Policies	
EN17	Local Green Spaces	<p>OBJECT (holding objection)</p> <p>A number of local green spaces are proposed borough wide including Paddock Wood. The Town Council wishes to designate sites in its forthcoming Neighbourhood Plan.</p>
EN23	Air Quality	<p>OBJECT</p> <p>There is little consideration of air pollution and the impact this will have on residents of a town which will more than double in size if these developments go ahead. It is unclear how some measures proposed in the policy can be achieved through the statutory planning process. The need for hedgerows and trees along roads will be more important than ever.</p> <p>Comment is made elsewhere regarding a worsening of air quality due to increased traffic flows and congestion. Any further development of the town on any of the suggested sites should provide for improvements to the road network and connectivity as described (new route to the east of the town and the bridle way leading from Maidstone Road at Eastlands should be upgraded and extended to connect with the A228 north of the Badsel roundabout).</p>
EN28	Flood Risk	<p><i>OBJECT</i></p> <p><i>1. The Plan is confined to the borough's boundary. The strategy proposes <u>transformational change</u> to Paddock Wood/east Capel, and a new settlement at Tudeley, close to Tunbridge Wells and Tonbridge. Paddock Wood would no longer remain a small rural town. The strategy proposed would more sharply divide the borough into an urban west and rural east.</i></p>

	<p>2. <i>There is a Duty to Cooperate in Plan preparation concerning strategic cross boundary matters. <u>Statements of common ground</u> have not yet been agreed with Tonbridge and Malling BC, or for West Kent.</i></p> <p>3. <i>In its present form, the Plan should proceed on the basis of a <u>joint Plan</u> that includes Tonbridge and Malling BC (i.e. Tonbridge) and perhaps part of Maidstone BC in order -</i></p> <p><i>i. to ensure cross boundary issues are fully addressed including health, transport, social care and education;</i></p> <p><i>ii. in view of the planned provision of development at Tudeley beyond 2036; and</i></p> <p><i>iii. to consider the possibility that development proposed at Paddock Wood/east Capel could similarly be <u>phased</u> over a longer time frame. This would allow for a reduction to be made in the allocations proposed under AL/PW1 – there is the additional point, in light of the physical constraints referred to elsewhere in Paddock Wood/east Capel, whether any <u>unmet need</u> in the borough could be more sustainably located within the Tonbridge and Malling and Maidstone boroughs under a jointly prepared Plan?</i></p> <p>4. <i>For development to be <u>sustainable</u> there is a need to identify land for the right type of development, sites must be in the right place, and development must be supported by infrastructure.</i></p> <p><i>Borough wide, the allocations proposed for Paddock Wood/east Capel and Tudeley have been determined substantially on the basis of minimising the release of green belt and minimising the impact of development upon the AONB.</i></p> <p><i>Objection is made to the loss of <u>green belt</u> to the west of Paddock Wood to accommodate development at parcels 1, 2 and part of 3 under AL/PW1.</i></p> <p><i>All the housing sites identified in the Key Diagram and under AL/PW1 require <u>flood compensation</u>. Bringing forward development sites presently prone to flooding is arguably more contentious than releasing sites in the green belt or AONB given the costs involved (including the opportunity cost) and environmental impact i.e. given that with climate change the prospect is storage, attenuation and mitigation measures will need to be ‘topped up’ in future. Building upon the ‘wrong’ sites if, indeed, is</i></p>
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		<p><i>what is proposed, is not sustainable - it absorbs developer contributions better put elsewhere and compromises the garden village ideal that underpins the strategy for Paddock Wood/east Capel.</i></p> <p><i>A Strategic Flood Risk Assessment (SFRA) 2019 underpins much of what is proposed for Paddock Wood/east Capel but this is considered to be an unreliable basis for doing so. An initial review of the SFRA raises questions concerning the period over which the SFRA was undertaken, how it tied in with the Sustainability Appraisal (in particular, in assessing alternative strategies), and how robust the SFRA is in terms of the data it has relied upon and the modelling undertaken. The absence of detail concerning flood storage, alleviation and mitigation measures raises fundamental doubts about the viability and deliverability of the strategy proposed for Paddock Wood/east Capel –</i></p> <p><i>a. the SFRA has been carried out on a borough wide basis. As the Plan has evolved, cross boundary issues have become more prominent. The impact of the strategy proposed at this stage, beyond the boroughs boundary, in flood risk terms, appears not to have been assessed;</i></p> <p><i>b. the SFRA has not carried out a Sequential Test (ST) of potential development sites (para. 13.2, Level 1 Report). If an ST has not been carried out borough wide, it cannot be said there are not other sites that are less prone to flooding, and which may be more suitable for development;</i></p> <p><i>c. further to ‘b’, it is unclear at the moment what this means for the individual parcels identified for development under AL/PW1. For example, in the Level 2 Report, for parcel 1, it was noted by the borough council’s consultants ‘Parcel 1a is located in the path of an easterly flood flow route, which continues into Paddock Wood. During initial discussions with the council, it was agreed to position the residential area in this location (and therefore not following the sequential approach for placement of development)...’ (Appendix I).</i></p> <p><i>d. Information in the SFRA provides insufficient detail to satisfy the requirements of the Exceptions Test (ET) for ‘individual developments or groups of developments as part of a masterplanned or comprehensive development approach’ (para. 1.4.1, Level 2);</i></p> <p><i>e. the Stage 2 SWMP for Paddock Wood noted that the town’s susceptibility to flooding is influenced by the existing surface water network being at capacity (para. 2.4.2, Level 1 Report);</i></p>
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		<p><i>f. the SFRA appears to have mixed up the Beult and the Bewl (Table 6-1, Level 1 Report). It is unclear if this is a typing error or, if intended, how this might affect the modelling undertaken by the consultants;</i></p> <p><i>g. It appears that the UMIDB has, at best, had only limited involvement in the preparation of the strategy;</i></p> <p><i>h. it is unclear as to how the existing/planned developments at Mascalls Farm, Mascalls Court Farm and Church Farm, and the proposed development of certain of the individual parcels under AL/PW1 will relate to one another.</i></p> <p><i>Detailed comment on the SFRA is supplied under separate cover.</i></p> <p><i>Comment on individual parcels under AL/PW1 follow. PWTC's concern is the extent to which the allocations made under that policy accord with the NPPF/PPG.</i></p> <p><i>5. Whilst the LPA subscribes to <u>garden settlement principles</u> in guiding development at Paddock Wood/east Capel and Tudeley, it is unclear whether both places could be designated as garden villages and so benefit from assistance that the government's programme can provide.</i></p> <p><i>The Plan proposes <u>masterplanning</u> and <u>betterment</u> as a cure-all. When the planning, resource and coordination that is implied by this is compared, to take one example, with Homes England's garden community initiative in West Ifield (West Sussex), PWTC remains unconvinced that the borough council, despite its best intentions, has the capacity to deliver its strategy in its present form.</i></p> <p><i>6. Homes England suggests 'given its complexity, potential for infrastructure provision needed up front and long timeframe for delivery, <u>CIL</u> may not always be feasible or appropriate for a garden community scheme' (MHCLG Land Value Capture and Funding Delivery, 27th September 2019).</i></p> <p><i>7. The LPA's assessment of <u>housing need/provision</u> inflates housing numbers required over the Plan period which has a bearing upon the allocations proposed for Paddock Wood/east Capel.</i></p> <p><i>8. With regard the <u>distribution of housing</u> development, objection is made above under '4' above to the loss of green belt.</i></p>
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H2	(including) Piecemeal development of large sites	SUPPORT
H5	Affordable Housing	SUPPORT subject to specifying some of the affordable housing should be social rented stock rather than just affordable which is not the same thing in practice.

H9	Housing for older people	<p>SUPPORT</p> <p>The Town Council supports the provision of housing for older people, in principle, as it does for other groups. Mindful of the impending Commercial Road appeal, an issue can arise where such housing competes with other uses, particularly within the town centre. In many respects, a town centre location would be an ideal place for schemes to accommodate older people but this should not be at the expense of what makes the town centre such an attractive location in the first instance i.e. in being close to services and facilities. I believe this is recognised implicitly within the Plan and decisions on individual planning applications will need to be made on the merits of each case. This policy can be supported overall with this support, perhaps, expressed on a 'without prejudice' basis given the Commercial Road appeal. See also comment under ED11.</p>
ED1	Key Employment Areas	<p>SUPPORT</p> <p>This identifies employment sites in Paddock Wood.</p> <p>It is essential that development of employment opportunities does not only extend the existing storage and distribution facilities, which employ few people. What is needed is B1 & B2 to encourage people to live and work in the town, reducing traffic and pollution.) Also, to attract major companies with office based services.</p>
ED8	(Town) centre hierarchy	<p>OBJECT</p> <p>This proposes to move Paddock Wood out of the rural service centre bracket to be designated a Town Centre alongside Cranbrook and Southborough. Whether this policy can be accepted will depend upon what is, in turn, accepted in terms of the scale of development at Paddock Wood/east Capel, its distribution, how sustainable it would be and phasing.</p>
ED9	Town and rural centres	Ditto
ED11	Primary shopping area	SUPPORT

		Supporting text proposes a flexible approach to development within town centres and primary shopping areas against the background of the difficulties faced by the High Street. Comment should be made that every effort must be made to retain the commercial core of the town in view of recent residential development and prospective schemes, so reducing the need for residents to have to travel elsewhere for retail and complementary services and facilities.
TP5	Safeguarding railway land	SUPPORT Para. 6.533 refers to the former Paddock Wood – Hawkhurst (Hop Pickers) Line and which the LPA will safeguard. Support.
TP6	Colts Hill bypass.	SUPPORT subject to provision first of a bypass for east of Paddock Wood. [This policy safeguards land].
Section 7	Delivery and Monitoring	
7.5-7.12	Housing Delivery	SUPPORT [Refers to a Housing Action Plan].