



12th January, 2023

Dear Mr Ashcroft,

**Paddock Wood Neighbourhood Development Plan
Response to Clarifications**

Thank you for your clarification note and for providing the Town Council with the opportunity to respond. This letter sets out our responses, in the order in which they appear in your note. We hope you find these of assistance and would be happy to respond to any further queries you may have.

Yours sincerely,

M A Flashman (Mrs)
Councillor Meryl Flashman

Chairman of Paddock Wood Town Council

General

> Q:

Several policies in the Plan have sought to add value to policies in the emerging Local Plan. As the Town Council will be aware the Planning Inspector has now issued his preliminary findings on the Local Plan.

Does the Town Council have any comments on this matter?

>> A:

Whilst the Neighbourhood Plan has been developed with the emerging Local Plan in mind, the policies within it have been tested against both that and the strategic policies in the adopted Local Plan (comprising the Local Plan 2006, Core Strategy 2010 and Site Allocations 2016), as set out in the Basic Conditions Statement. Although delays to the emerging Local Plan are unfortunate, this should not impact on progress of the Neighbourhood Plan. Indeed, with planning applications continuing to come forward in the area in advance of the Local Plan, the Neighbourhood Plan becomes more important.

This situation is not uncommon. The Neighbourhood Plan in Hailsham (Wealden District) for example faced similar issues: it was drafted in such a way to reflect the direction of travel in the emerging Local Plan which envisaged significant growth around the town and where the examination of the Neighbourhood Plan was taking place at the same time as the Local Plan Inspector had issued their initial findings on that. The Local Plan was eventually withdrawn from examination, leaving the Neighbourhood Plan as the most up-to-date statement of policy. Whilst looking forward, that Neighbourhood Plan satisfied the Basic Conditions in terms of the adopted policy framework and has been successfully made.

Whilst some new or alternative wording may need to be included in the Neighbourhood Plan to clarify the position with the emerging Local Plan and growth areas (and which the Town Council is happy to work on further with you), this should not be a reason to delay progress on the Neighbourhood Plan. Indeed, in their Regulation 16 response, TWBC acknowledges that should the Neighbourhood Plan be made ahead of the emerging Local Plan being adopted, then an assessment will be made as to which of the Neighbourhood Plan policies might be superseded by that. This is accepted by the Town Council.

The Town Council has endeavoured to work on the Neighbourhood Plan for the best part of ten years, notwithstanding the changes to Local and national policy over this period and the challenges this has created for the Plan. The Neighbourhood Plan has been subject to numerous rounds of consultation as well as discussion with TWBC. At the heart of the Plan is the desire to plan for better in Paddock Wood, to improve the quality of life and environment for all.

The Neighbourhood Plan includes, in Section 1, a commitment to monitoring and updating the Neighbourhood Plan such that it remains current and in conformity with Borough and national policy. Should you be minded to recommend that the Neighbourhood Plan proceed to referendum, the Town Council will consider the implications of the new Local

Plan (if and when adopted) and possible changes to the National Planning Policy Framework, as and when they take place.

We note that you have asked the Borough Council to confirm their timeframe for responding to the initial findings of the Local Plan Inspector. The Town Council has seen the initial response to these from the Borough Council, dated 22 December 2022, and which is available via the Local Plan EIP website.

The Initial Findings relate to, amongst other matters, those associated with Green Belt release and development in areas of high flood risk. These are significant issues of particular relevance to Paddock Wood and the Borough Council has been unable to put a timeframe on how long it will take to respond to the initial findings, though it will inevitably cause delay to the adoption of the Local Plan (or even put that at risk). Indeed, the Borough Council note in their response to the Inspector that 'we believe that the proper assessment of each of these is likely to take some time in order to come to a robust conclusion'.

The consequence of this is that the Neighbourhood Plan is now likely to be ahead of the Local Plan and it becomes more important in terms of putting in place up-to-date and locally specific policies for Paddock Wood, and which is emphasised by the fact that planning applications are coming forward irrespective of the delays to the Local Plan.

Policy TC3

> Q:

The policy reads well. For clarity am I correct to assume that individual development proposals will not need to comply with all the criteria in the policy?

>> A:

That is correct. The Town Council acknowledges that not all development proposals will be able to meet all of the criteria. However, where they can't, they should not preclude other proposals from being able to deliver those criteria.

Policy TC4

> Q:

As submitted the policy reads as an ambition rather than as a policy. In specific terms which organisations are expected to provide the bridges?

>> A:

The initial draft Policy subject to the Regulation 14 consultation stated that 'New bridges must be provided across the railway...'. The response from TWBC was that this did not provide sufficient flexibility and that the policy should be reworded accordingly, replacing the word 'must' with 'will'.

Subject to your views and guidance, the Town Council proposes that the policy be reworded such that it reads less as an ambition and more as a policy. We propose that para 1 be redrafted accordingly:

'Proposals for new pedestrian and cycle bridges across the railway line within the town centre and elsewhere, including future growth areas, will be supported. They must...'

Bridges across the railway line are identified in the TWBC Strategic Sites Study and accompanying Town Centre Masterplan Study. These studies suggest that infrastructure items such as bridges will be funded and delivered by developers and through use of s106 agreements. It is anticipated that Network Rail and other partners, including the Highways authority, would be integral to the design and delivery process.

Policy GI2

> Q:

The policy acknowledges its overlap with the master planning process for each of the development sites. How has the Town Council assessed this matter? Does it anticipate that the general nature of the policy will feed into the master planning process?

>> A:

It is expected that the location, route and design of green fingers will be developed during the masterplanning stage of the planning application process.

It is to be noted that TWBC did not comment on this policy during the Regulation 14 consultation stage. Equally, they have not commented on this in their Regulation 16 response. The policy is also supported by Kent County Council in their Regulation 16 response.

The Town Council also notes that, irrespective of the wider points made on behalf of Crest Nicholson and Redrow / Persimmon Homes, neither raises issue in respect of this policy.

Policy GI4

> Q:

This policy reads well. The sixth criterion reads as supporting text rather than policy. In these circumstances I am minded to recommend that it is repositioned into the supporting text. Does the Town Council have any comments on this proposition?

>> A:

The Town Council is happy to be guided by you in this respect.

Policy GI5

> Q:

The policy has been well-considered and is underpinned by Appendix A. I am minded to recommend that the policy itself takes on the matter-of-fact approach in the NPPF on local green spaces. Does the Town Council have any comments on this proposition?

>> A:

As above, the Town Council is happy to be guided by you in this respect.

Policy GI6

> Q:

This policy also reads well. Its third part reads as supporting text rather than as policy. In these circumstances I am minded to recommend that it is repositioned into the supporting text. Does the Town Council have any comments on this proposition?

>> A:

As above, the Town Council is happy to be guided by you in this respect.

Policy HD1

> Q:

This is another well-considered policy. It is a good local response to Section 12 of the NPPF. The connection with the submitted Design Code and Guidelines is clear. Its third part reads as supporting text rather than as policy. In these circumstances I am minded to recommend that it is repositioned into the supporting text. Does the Town Council have any comments on this proposition?

>> A:

Whilst accepting that some of this paragraph might be more appropriately positioned within the supporting text the Town Council is keen to stress that innovative approaches to design are not precluded by the policy. Subject to your views, the Town Council proposes that the third paragraph be rephrased to read:

'Innovative Schemes that respond to and reinterpret local design cues, and which demonstrate an imaginative sense of place whilst respecting surrounding context, are welcome.'

And, as a new paragraph:

'All development proposals should be informed by the Paddock Wood Design Guidelines and Code and make reference to principles established in Building for a Healthy Life.'

The suggested rephrasing would allow for innovative design, but by reference to the Code and Building for a Healthy Life, show how all proposals respond to context and deliver good design.

> Q:

Plainly the policy will impact on individual schemes in different ways. Is it intended to apply to the development of the strategic sites in the neighbourhood area identified in the Local Plan?

>> A:

Yes – it should apply to all proposals, and is essential for the strategic sites as these will have a significant impact on the character of Paddock Wood.

Although TWBC has prepared a strategic sites masterplan (referred to in the emerging Local Plan as the 'Structure Plan') further detail will be required as part of the next steps in the process, including the planning application for each of the sites and growth areas.

The Policy in the Neighbourhood Plan establishes good principles applicable to Paddock Wood. In line with Government guidance, great emphasis is placed on the delivery of good design. As proposals for the strategic sites develop further they should demonstrate how they have been designed in response to local context and reflect the principles outlined in the Policy.

> Q:

If so, how will any potential conflict between the Design Guidelines/Code on the one hand and the emerging Local Plan policies and master plans on the other hand be addressed?

>> A:

The Policy in the Neighbourhood Plan and supporting Design Code reflect Government Guidance in respect of the role that local communities can play in helping to achieve high quality and well-designed places and buildings.

The emerging Local Plan, although lengthy, is limited in terms of what good design means in the context of Paddock Wood. Policy STR/SS1 for example, simply states, at Paragraph 5, that proposals should:

'Be developed to a high standard of design and layout. Particular attention to be paid to layout, scale, height, design, and massing to ensure that the development is of a high quality design responding to local character. Planning applications for development should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application'.

Strategic Policy STR2 of the emerging Local Plan states, under point 1, that new development should:

'Respond positively to local character and context to preserve and enhance the quality of existing communities and their environs, as well as taking the opportunity to create a new identity informed by local character and context, where appropriate'.

These policies do not establish what local character means in the context of Paddock Wood. That gap is filled by the Neighbourhood Plan and accompanying Design Code, and which should be used to inform proposals and allow decision-makers to determine how strategic policies have been satisfied.

It is to be noted that the structure and content of the Design Guide and Code was discussed with TWBC prior to the Regulation 14 consultation and that was reflected in the relatively limited responses subsequently provided by TWBC at that stage, which included the

comment that 'the reference [in the Design Guide] to TWBC developing more detailed guidance for development parcels, but with the NDP's Design Guidance being used as the starting point, is welcomed'.

The NDP policies and design code should apply as the most local and up-to-date policy position – until such time as they are superseded, or supplemented, by newer, strategic policies or approved masterplans. That is not currently that case.

The Neighbourhood Plan also supports the use of Design Review for emerging schemes. This process will help assess the suitability of the design response to the context and policy framework, informing updates as appropriate to proposals, and supporting the decision-making process by officers.

Policy HD2

> Q:

This is an excellent locally-distinctive policy. The second part of the policy seems unnecessary given the contents of paragraph 7.31. The third part reads as supporting text rather than as policy. In these circumstances I am minded to recommend that these parts of the policy are repositioned/amalgamated into the supporting text. Does the Town Council have any comments on this proposition?

>> A:

The Town Council is happy to be guided by you in this respect.

Policy HD3

> Q:

Plainly the national position on low-carbon dwellings is fluid and likely to change further within the Plan period. Nevertheless, to what extent has the Town Council assessed the extent to which the policy has regards to national policy and would be commercially viable?

>> A:

The Town Council is conscious of the limitations on NDPs and how far standards for the sustainable design and construction of buildings can be set in policies. To that end, the policy encourages development to meet high standards, rather than requiring them to. Paragraph 1 of the Policy notes that (and until such standards are required by future changes to national policy), the meeting of higher standards is subject to viability.

Policies SR1/SR2

> Q:

Plainly there is an element of disagreement between the Town Council and the Borough Council on the location of the recreation facilities. How will this be resolved in order to bring the clarity required by the NPPF for development plan policies?

>> A:

The idea for the sports hub and the preferred location for this, as well as the retention and improvement of the Putlands Centre, has been subject to consideration by the Town Council since work on the Neighbourhood Plan commenced, and pre-dates work by TWBC on the emerging Local Plan in this respect.

The location of sports facilities, and the new outdoor sports hub in particular, have also been subject to discussion between the Town Council and TWBC, and their consultants. The Town Council has made its case to the Local Plan Inspector and awaits the outcome of that: the initial findings do not touch on this subject. It is assumed that this and other matters may follow once TWBC has responded to the initial findings. As per the earlier question posed, it may take considerable time before information is available for the emerging Local Plan to proceed.

The Town Council and TWBC has agreed, as per the responses to the Regulation 14 consultation, that the position in respect of sports facilities represents uncommon ground. It was agreed by TWBC that the Neighbourhood Plan should proceed with its preferred locations and policies, but that this may be superseded by the emerging Local Plan (if and when adopted).

The Town Council notes that in their Regulation 16 response, Kent County Council expresses support for the proposed approach to creating additional sports facilities and maintenance of existing facilities, and that through the Active Kent and Medway Partnership (funded by Kent County Council and Sports England) would be willing to work with the Town Council to deliver improvements to sports facilities.

The Town Council sees no reason why the position taken in the Neighbourhood Plan should be changed at this time. The tests of the Basic Conditions are against the adopted Local Plan and the Neighbourhood Plan satisfies this. A pragmatic approach has though been taken, with the Neighbourhood Plan conscious of the direction of travel established in the emerging Local Plan. However, with the emerging Local Plan delayed (and potentially at risk) it is important to proceed with the Neighbourhood Plan. If the emerging Local Plan is adopted after the Neighbourhood Plan, and retains policies in respect of the outdoor sports hub, that will then take precedence over the Neighbourhood Plan. This would not be the preferred outcome for the Town Council, though is accepted as a potential scenario.

The Town Council is happy to provide you with further information to support its position, including background work undertaken in partnership with local sports clubs and organisations to help inform its approach.

> Q:

Could Policy SR2 work effectively without a direct reference to the Town Council's preferred site?

>> A:

In part, yes (although Paragraph 4 refers to the Putlands Centre), but there are strong reasons why land at the site along Eastlands Lane has been identified as the Town Councils preference.

Representations

> Q:

Does the Town Council wish to comment on any of the representations made to the Plan?

In their different but overlapping ways the representations from Tunbridge Wells Borough Council, Crest Nicholson and Redrow Homes/Persimmon Homes address the general question raised earlier in this note about the way in which the emerging neighbourhood plan relates to the adopted Local Plan and to the emerging Local Plan. The various organisations raise detailed comments about Policies TC4, HD1, HI1, HI3, HI4-6.

It would be helpful if the Town Council would respond to the various comments.

A:

The Town Council is grateful for the opportunity to review and respond to the Regulation 16 responses, specifically those made by TWBC and those on behalf of Crest Nicholson, Redrow and Persimmon Homes.

In terms of the Regulation 16 responses as a whole, we note:

- Some express support and offer minor suggestions and amendments that the Town Council is happy for you to consider. These include responses from Brenchley and Matfield Parish Council, Kent County Council, the British Horse Society, and NHS Kent and Medway.
- Some do not offer comments on the Neighbourhood Plan, but rather respond to acknowledge receipt. The Town Council takes these to mean those organisations are happy with the Neighbourhood Plan. This includes responses on behalf of National Grid, those from Historic England, Natural England and The Coal Authority.
- Some comment on the need for the Neighbourhood Plan to make reference to the requirement for the delivery of specific infrastructure or need for additional assessments associated with growth. The Neighbourhood Plan is not proposing new growth over and above that in either the adopted or emerging Local Plan and the need for any infrastructure is more appropriately considered by TWBC in their Infrastructure Delivery Plan. Equally, matters associated with sequential testing associated with fluvial flood risk are for TWBC to address through the Local Plan. Indeed, TWBC has been asked to look into such issues further by the Local Plan Inspector. Responses from the South East Coast Ambulance Service fall into this category, as do responses from the Environment Agency, National Highways and Southern Water.
- One raises matters that are not relevant to the Neighbourhood Plan, including that from E. Goddard in respect of free parking.
- One response is made by Heritage Paddock Wood in respect of the Wesley Centre, stating that the green to the rear should be designated as Local Green Space. The Wesley Centre and associated curtilage is though identified in Policy PW HD2 of the Neighbourhood Plan as a local heritage asset. The Town Council is sensitive to this response and is happy to be guided by you.

Turning now to the comments from TWBC, Crest Nicholson and Redrow/Persimmon Homes, and to the policies you identify in particular:

Policy TC4:

- Responses from TWBC suggest that the words 'they must' at the end of Paragraph 1 of the Policy is too inflexible and suggest replacing with 'they should', or words to that effect. In our response above we have suggested alternative wording such that the first paragraph of this policy appears as less of a project. The Town Council is happy to be guided by you in this matter, though does believe that replacing the word 'must' with 'should' would weaken the policy given the importance of delivering safe and attractive new routes that will become a key part of the active travel network and help encourage more people to walk and cycle.
- Responses on behalf of Crest Nicholson note that Paragraph 3 of the Policy should be amended. The Town Council has suggested wording in the sections above based on your clarifications and is happy for you to decide how best to reframe this. However, the wording put forward by Crest Nicholson only makes specific reference to a crossing in the western growth area. The policy should apply to any and all bridges, irrespective of location.
- The response from Redrow/Persimmon questions the requirement for bridges in the growth areas, noting that Local Plan Policy STR/SS1 states that it is only in the western growth area that a bridge should be delivered, although Policy STR/SS2 does refer to other bridges being needed, as illustrated on the accompanying Structure Plan. The Town Council acknowledges this and has suggested an alternative form of wording in response to your clarification questions above.

Policy HD1:

- Responses from TWBC note that Criteria 2e could be supplemented with the addition of a map indicating views. As drafted the policy instead points to production of landscape and view assessments, which is supported by Crest Nicholson.
- Responses on behalf of Crest Nicholson are relatively minor. They cross refer to the need for engagement with Kent County Council. The Town Council however notes that the County Council has not made any specific response to this policy. The Town Council is happy for you to consider the appropriateness of the suggested wording changes.
- The response on behalf of Redrow / Persimmon includes (at paragraph 6.3 of their response) some relatively minor comment on the content of the Design Code to which Policy HD1 points, but that at Paragraph 2.30, and notwithstanding other comments made on the Neighbourhood Plan, that land to the east of Paddock Wood is being designed to reflect the aims and aspirations of this (and other) policies. Other than as outlined above and in response to your other clarifications, the Town Council does not consider that further changes are required.

Policy HI1:

- Responses from TWBC suggest that the requirement for First Homes to be delivered at a discount of 50% is not viable. However, it is noted from the Housing Needs

Assessment Topic Paper (dated February 2021)¹ submitted with the emerging Local Plan that TWBC acknowledges that discounts of greater than 30% are likely to be needed. It states:

'Given the high affordability of houses within Tunbridge Wells borough it will be important for the Council to ensure that such housing is genuinely affordable in a local context.... there will quite likely be occasions when a greater discount than 30% will be required, subject to scheme design. In these circumstances an additional discount can be considered, taking into account whether this would impact on viability.'

- This is reflected in the Policy in the Neighbourhood Plan. It is clear from Paragraph 1d of Policy HI1 that a discount of 50% is not a requirement. Rather, it states that qualifying developments are 'encouraged' to provide First Homes at a discount of 50%. Should you feel it helps add clarity, the Town Council suggest that the words 'subject to viability' could be added to the end of the text. We are happy to be guided by you in this respect.
- TWBC also suggest that, for the purposes of clarity, the breakdown of affordable housing tenures should be included in the Policy. The Town Council is happy to accommodate this subject to your views.
- The response from Crest Nicholson incorrectly states that it is only Local Planning Authorities that can require the discount on First Homes to be increased from 30%: the Government Guidance on First Homes clearly states that Neighbourhood Planning groups have the discretion to change the level of discount. However, the thrust of the response is similar to that made by TWBC. Please therefore refer to the Town Council's comments above.
- The main thrust of the response from Redrow / Persimmon is that the requirement for First Homes to be discounted at a level of 50% is unviable and unjustified. The Town Council's response is set out above.

Policy HI3:

- The response from TWBC suggests that the policy 'requires' 5% of the plots on the strategic sites to be set aside for self and custom build housing. This is not the case. The policy says they are 'encouraged' to where viable. Given the significant affordability challenge identified in Paddock Wood (as set out in Appendix G in respect of the house price to household income/mortgage availability ratio) it is important that alternative housing products are explored.
- The Housing Need Topic Paper (see link above) calculates a requirement for 518 plots for self and custom build purposes over the Plan period. The TWBC Housing Supply and Trajectory Topic Paper² assumes that the majority of this (some 401 plots) will be accounted for by windfall development. The Town Council does not consider this a particularly proactive approach to facilitating delivery of this type of housing product, though recognises that this is a discussion for the emerging Local

¹ https://forms.tunbridgewells.gov.uk/__data/assets/pdf_file/0016/403360/3.73-Housing-Needs-Assessment-Topic-Paper.pdf

² https://forms.tunbridgewells.gov.uk/__data/assets/pdf_file/0017/403361/3.74a-b-Housing-Supply-and-Trajectory-TP-combnd.pdf

Plan. TWBC suggest that the majority of the remaining requirement for self-build plots be accommodated within the Tudeley Garden Village: the timing and delivery of which is now delayed and subject to adoption of the Local Plan (i.e.: it is at risk). In the absence of the Garden Village proceeding, even in the short to medium term, the need for self and custom plots calculated by TWBC will not disappear. Indeed, alternatives will be needed. The Paddock Wood Neighbourhood Plan will contribute towards this.

- Although the Policy notes that provision of plots is not a requirement, the Town Council is happy to consider additional wording to build further flexibility into the policy and suggests the inclusion of the following, or wording to this effect, as a new point in paragraph 2:

'Plots will be made available and marketed for a period of time to be agreed through the planning application process. If, after marketing, plots have not been sold, and sufficient information has been provided to indicate there is no interest in these, the applicant will be able to develop the land for market housing.'

- The general thrust of the response made on behalf of Crest Nicholson is similar to that made by TWBC. Please therefore refer to the Town Council's comments above.
- Similarly, the responses made on behalf of Redrow / Persimmon question the provision of 5% of plots on growth areas for self and custom build housing. The Town Council's comments as set out above apply.

Policy HI4:

- The Town Council notes that TWBC has not commented on this policy. We infer that this means TWBC is comfortable with it.
- Response made by Crest Nicholson do not refer to this policy either.
- Likewise, the response from Redrow / Persimmon does not comment on this policy. It is however noted that the response says that the eastern growth area is being designed to reflect the aims and aspirations of this policy.

Policy HI5:

- The Town Council considers the comments from TWBC in respect of school and healthcare provision to be relatively minor and is happy to be guided by your views on the appropriate wording to be incorporated in the Neighbourhood Plan. However, in respect of paragraph 10.29 of the Neighbourhood Plan, TWBC comment on the relationship between local centres and the outdoor sports hub. The location of the sports hub is the subject of your earlier questions. Irrespective of where the outdoor sports hub is eventually located, it remains correct to say that this could potentially be well related with a new local centre, benefitting from movement to and visitors to that. The text could be slightly amended to simply state this rather than specifically referring to the northern location.
- The response made on behalf of Crest Nicholson suggests that the Policy (at Paragraph 1a) specifies a list of uses that are to be accommodated in the Local Centres which goes beyond the Local Plan policy. It is clear from the text in the Neighbourhood Plan policy that these are not a list of uses that must be provided, but are instead appropriate local centre uses that would be welcome in a successful

local centre that meets the day-to-day needs of the community. The Town Council does not consider that the text should be amended. It is to be noted that TWBC does not comment on this and it is therefore inferred that they are comfortable with the approach.

- Similarly, the response on behalf of Redrow / Persimmon suggest the policy is too prescriptive in terms of the uses that it says are a 'requirement' of the policy. As above, this is not the case – rather, proposals that incorporate a mix of uses, including those outlined in the policy, would be supported. There is no suggestion that all of the local centres should incorporate all of the uses set out in the policy.
- The response on behalf of Redrow / Persimmon also suggest that the policy 'requires' primary schools and early years provision to be integrated into the local centres. Again, it should be clear from the wording in the Neighbourhood Plan that this is not a requirement, but rather that such approaches are 'encouraged'. Linking local centres and wider community uses, such as schools, strikes the Town Council as a common sense approach to good planning for new places, minimising travel, integrating trips and activity, strengthening those centres, community cohesion and social inclusiveness. This theme is developed in the TCPA guide to '20-Minute Neighbourhoods'³ which outlines the features of such places, including 'schools at the heart of communities'.

Policy HI6:

- The responses made by TWBC in respect of Policy HI5 are noted as applying equally to Policy HI6. Please therefore refer to the comments we have set out above.
- The response made by Crest Nicholson to this policy is similar to that made in respect of Policy PW HI5: that it specifies a list of uses to be provided. As above, the Town Council notes that these uses are not required, but are uses which would be supported should planning applications be made. Again, TWBC does not comment on this.
- The response made on behalf of Redrow / Persimmon refers again to the integration of schools and health centres within the local centres. As before, this is not a requirement. The policy uses the word 'should'. Equally, the wording 'should' is used in terms of the phasing and delivery of community uses. This is reflective of the Strategic Sites Masterplanning work undertaken for TWBC to which the response refers. Furthermore, the Policy also expresses preference for the location of different facilities. This is not a requirement as the response suggests.

The Town Council notes that, despite the length of response, those from TWBC are generally supportive of the Plan and policies (as noted in the introduction to the response).

Equally, the response made on behalf of Crest Nicholson notes that the Neighbourhood Plan has been positively prepared and successfully sets out a vision for the future of Paddock Wood. Their response appears broadly supportive of the Plan, with suggested changes (even where the Town Council may consider them unnecessary) relatively limited in nature.

³ Town and Country Planning Association, March 2021, 20-Minute Neighbourhoods – Creating Healthier, Active, Prosperous Communities: An Introduction for Council Planners in England

Furthermore, and despite the length of the response made on behalf of the Redrow / Persimmon, that work on growth areas being undertaken by them is being designed with the aims and aspirations of many of the policies of the Neighbourhood Plan in mind. Indeed, with work on growth areas progressing in the absence of an adopted Local Plan, this emphasises the importance of the Neighbourhood Plan as stated in response to the first clarification question.