



# The countryside charity

Kent

## Matter 6 – Strategic Sites (Policies STR/SS1, STR/SS2, STR/SS3, STR/PW1 and STR/CA1)

Issue 3 – Paddock Wood and East Capel

### Size, Scale and Location of Development

*Q1. What is the justification for having a single policy (Policy STR/SS1) for the different development parcels at Paddock Wood and East Capel? Is it necessary to have development requirements for each specific area?*

It is CPRE's view that having a single policy is appropriate. Successful delivery of a strategic urban extension of this proposed scale by multiple developers and infrastructure providers will require a high degree of co-ordination throughout the planning and delivery lifecycle. CPRE understands that more detailed guidance on how policy requirements will be met for each specific area may be set out in separate Framework Masterplan SPDs, but all will be produced and subject to public consultation at the same time. (CD\_3.143 Local Development Scheme October 2021). This approach appears to support the integrated approach to development across the areas which will be essential to the effective delivery of the urban extension and town centre regeneration.

*Q2. How was the size of each parcel determined and what alternatives to the scale of development proposed at Paddock Wood and East Capel did the Council consider?*

CPRE Kent notes that the Plan allocates an area of approximately 418 hectares in three parcels. However, the Plan does not set out the developable area per parcel or for the whole urban extension - although an average density of 35-38dph is given in the Strategic Sites Topic Paper (CD\_3.67). As a result, it is unclear whether the size of the site was determined by the number of homes required or vice versa.

CPRE Kent considers that all development, whether it be on sustainably located brownfield sites, or on green fields should be built at higher than low suburban development densities of 30dph, so that greenfield land take is kept to an absolute minimum. The National Model Design Code <https://www.gov.uk/government/publications/national-model-design-code>, part of the government's planning practice guidance, states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph.

The Council does not appear to have considered applying this guidance to the proposed urban extension even though, as the Plan states, all sites are within walking or cycling distance of Paddock Wood railway station (paragraph 5.176). The proximity of Paddock Wood main shopping area to the railway station is clear on Inset Map 5, Paddock Wood TC (CD\_3.129d(ii)).

We note that neither of the alternative options set out in the Strategic Housing and Economic Land Availability Assessment (CD.3.77| Paddock Wood Site Assessment Sheets) appear to consider increased density. Release of Green belt land at this location could have been minimised by increased density in the parcels/areas outside the Green Belt.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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We also remain to be convinced that the Council has placed sufficient emphasis on increasing density within the other towns and larger villages or insisting on high density development on allocated greenfield sites.

### Green Belt

*Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?*

CPRE notes that the Plan states that Development Strategy Topic Paper (CD\_3.126) states that these compensatory improvements are “to be agreed and secured through the master planning approach (paragraph 6.201). We have struggled to find any further information and would be grateful for guidance as to where such proposals are documented in sufficient detail in order to understand both where and how they will be achieved.

### Flood Risk and Drainage

*Q9. Can the parcel allocated to the east of Paddock Wood come forward without requiring residential development in areas at risk of flooding?*

The answer to this question appears to be no, if you compare the Environment Agency’s interactive surface water flooding maps with the proposed allocations. While there is an intention to designate some of the area most at risk of flooding as Local Green Space, it appears that there will still be areas at risk of flooding that will be built over.

*Q10. What is the justification for requiring a drainage strategy to be in place prior to the granting of planning permission ‘unless exceptional circumstances arise’? What might these circumstances be? Is the policy sufficiently clear and is it effective?*

CPRE considers that the justification is the existing problems with drainage in Paddock Wood, which result in residents regularly having their homes and gardens flooded with sewage. Building the proposed number of new dwellings will add massively to this problem unless an effective drainage strategy is in place before planning permission is granted, and unless the strategy’s implementation is phased to precede or at least keep pace with the new development. CPRE does not know what the exceptional circumstances might be and we do not think the policy is sufficiently clear and effective.

### Other Matters

*Q22. What is the justification for requiring each parcel to be delivered through the production of a SPD?*

CPRE understands that more detailed guidance on how policy requirements will be met for each specific area may be set out in separate Framework Masterplan SPDs, but all will be produced and subject to public consultation at the same time. (CD\_3.143 Local Development Scheme October

2021). This approach appears to support the integrated approach to development across the areas which will be essential to the effective delivery of the urban extension and town centre regeneration without unnecessarily constraining the multiple developers involved.