

**Paddock Wood Town Council**

**Matter 11 – Retail, Town Centres and Community Facilities (Policies STR/RTW1, ED8, ED9, ED10 and EN6)**

***ISSUE 1 – Town Centre Hierarchy***

**Q1. How has the hierarchy of centres in Policy ED8 been established? Is it accurate and based on appropriate, up-to-date evidence?**

**PWTC Response:**

1. TWBC has not taken into account the two consented developments in Paddock Wood Town Centre that have consumed the only land available for an expansion of the retail and service centre of the town since the quantum of development of the settlement on the surrounding sites was included in the Draft Plan. This imperils the sustainability of the settlement and its town centre. The high position of the settlement in the hierarchy outlined in the policy is therefore not sound.

**Q2. What are the Village Settlements for the purposes of Policy ED8? Are they retail centres, or villages defined by Limits to Built Development?**

**PWTC Response:**

2. This is for TWBC to answer.

**Q3. What is the justification for including the proposed Neighbourhood Centres at Tudeley Village and Paddock Wood? How will they be defined for future decision-making purposes?**

**PWTC Response:**

3. These should be treated separately from the settlement hierarchy until such time as they are designed and delivered when their position in the town centre hierarchy can be assessed and included in the next review of the Local Plan. Until such a time as they are delivered it is not clear on their location or mix of uses to be provided, and thus how they should be defined and what their function might be.

4. Policies in the Local Plan should thus be clear on the expectations for the centres and be used, in conjunction with the emerging Neighbourhood Plan, to shape and determine applications for development.
5. More work is required to assess what impact these Neighbourhood Centres will have on the viability of the current Town Centre in Paddock Wood. In the view of the Town Council there is a clear risk that both the current Town Centre and the new centres will be rendered unsustainable in commercial terms by competition between each other.

## ***ISSUE 2 – Managing Vitality and Viability***

**Q1. What is the need for commercial, leisure and town centre uses over the plan period and how will this be met?**

**PWTC Response:**

6. There is a need for new leisure and community space in Paddock Wood Town Centre in order to meet the needs of substantial increase in population resulting from the proposed strategic growth in the Local Plan. This is not addressed in the Local Plan.

**Q2. Does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead, as required by paragraph 86 of the Framework?**

**PWTC Response:**

7. The Local Plan does not allocate any sites for development in Paddock Wood Town Centre. It simply identifies the town centre area and establishes the mix of uses that would be considered appropriate. It defers further information to a forthcoming SPD. This will not carry the same weight as the Local Plan and is not effective in shaping the necessary type and scale of change in the town centre. In the meantime, applications have begun to come forward and will continue to do so, and which risk undermining the objectives for comprehensive, holistic change.
8. TWBC has not taken into account the two consented developments in Paddock Wood Town Centre that have consumed the only land available for an expansion of the retail and service centre of the town.

**Q3. What is meant by ‘a range of appropriate uses’ for the purposes of Policy ED9? Does the Plan define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as required by paragraph 86 of the Framework?**

**PWTC Response:**

9. No. To provide clarity, the Local Plan should define the appropriate mix of uses in the town centre by reference to the use classes order. In the absence of this, the emerging Neighbourhood Plan has sought to establish what uses would be appropriate and, alongside this, has established principles in respect of the mixing of uses and design principles for creating successful places.

**Q4. What is the justification for requiring retail, office and leisure uses to be located in defined centres, and not other main town centre uses, under Policy ED10? Is this approach consistent with national planning policy?**

**PWTC Response:**

10. This approach is not consistent with NPPF in terms of its definition of 'Main town centre uses'.

**Q5. What is the justification for requiring development proposals to consider operating from a number of smaller units, rather than a single unit, as set out in paragraph 6.525 of the Plan?**

**PWTC Response:**

11. This does not feed directly into Policy ED10, although there is reference to flexibility in criteria 5 of that policy. 'Smaller footprint' outlets are supported in Paddock Wood Town Centre, responding to the grain of the town but also allowing for change and flexibility over time, avoiding large units becoming vacant at a future date and where there may not be sufficient operators to fill this space.

**Q6. What are the thresholds for impact assessments in Policy ED10 based on? Are they appropriate and justified?**

**PWTC Response:**

12. This is for TWBC to answer.

**Q7. Why are assessments required where there is the potential for 'adverse impacts – would the level of harm not be established by the assessment?**

**PWTC Response:**

13. This is for TWBC to answer.

### ***ISSUE 3 – Primary Shopping Areas and Retail Frontages***

**Q1. What is the justification for the proposed Primary Retail Frontages? How do they differ from the remainder of the Primary Shopping Areas?**

**PWTC Response:**

14. This is for TWBC to answer.

**Q2. How would a decision-maker react to a proposal for a change of use away from a main town centre use outside the Primary Shopping Area, but still within the Town Centre?**

**PWTC Response:**

15. It is not clear from the Local Plan how policies for development in the wider town centre area would be treated differently to those in the primary shopping area / retail frontages. The Town Centre policy (ED9) supports appropriate town centre uses which, although not set out, are considered to be the same as those in policy ED11, e.g.: Use Class E and other supporting sui-generis uses. There is no clear differentiation between these policies as to what might be appropriate in one location but not in another.

16. Furthermore, it is unclear how criteria in ED11 might be considered by decision makers. For example, criteria 2(d) notes that changes of use should not be permitted that result in an over-concentration of sui-generis uses in an area. The policy does not define what is meant by over-concentration, whether this varies from location to location, why this might be an issue, and how this could be controlled. This could potentially be achieved through a policy approach which establishes percentage thresholds for non sui-generis uses that should not be breached, and or clustering policies restricting the ability for sui-generis uses to locate next to each other.