



**Paddock Wood Town Council
Matter 8 – Meeting Housing Needs**

ISSUE 1 – Housing Requirement and Meeting Housing Needs

Q1. Does the housing requirement and plan period from the submission Plan remain justified and up-to-date? If not, what changes are required to make the Plan sound?

PWTC Response:

1. In terms of the housing requirement, this is dependent on the overall plan period. As we explain below, the plan period needs to be extended by at least two years to 2040. If one were to use the annualised housing target of 667 dwellings in the draft Local Plan and applied these to the additional two years required in the plan period, this would equate to an additional 1,334 dwellings required in the plan period .
2. The plan period in the submission Plan (2020 – 2038) is not justified or up-to-date. As we have set out in our representations the NPPF states that *“Strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development)”*. Planning Practice Guidance (PPG) confirms this: *“The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period”*.
3. TWBC previously calculated in its Housing Needs Assessment Topic Paper (2021) that it anticipated Local Plan adoption in June 2022 and that based on that calculation it would extend the Local Plan period to March 2038 so that the remaining Plan Period at the point of adoption would be 15.75 years.
4. The Submission Local Plan states at paragraph 1.13 that *“In accordance with national policy....this Plan runs from 2020 to 2038, following anticipated adoption in January 2023”*. Clearly the Local Plan will not be adopted in June 2022 or January 2023 and the earliest it would be adopted is at the end of 2024 if it were to pass Examination. On this basis the Local Plan period will not meet the minimum plan period of 15 years from adoption as required by the NPPF.
5. Therefore, the Local Plan period needs to be extended by at least two years (end date of March 2040) and the evidence base needs to be updated in line with this extension.

6. The Town Council has also pointed out that the NPPF now requires that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. As the Town Council has set out in its previous submissions, there is clearly a need for more lead in time to plan for this proposed new strategy which will require an enormous amount of funding, due diligence, community / stakeholder engagement and joined up planning in order to properly plan and deliver.

Q2. What Main Modifications are required to the housing trajectory and projected sources of supply as a consequence of the Council's suggested changes to the Plan? Are the suggested changes based on accurate and up-to-date information?

PWTC Response:

7. Further to our response to Q1 above, the trajectory clearly needs to be extended by two years to 2040 with the housing requirement for these years included in the trajectory as well.
8. As we set out in our representations in terms of the delivery rates proposed in the trajectory there is very little change from that in the previous trajectory proposed by TWBC.
9. There is also no granulated breakdown of the delivery assumptions across the newly proposed 'Revised Masterplan Areas' (Areas A-E) of development in Paddock Wood which is necessary to better understand the phasing of the housing delivery linked to the planned infrastructure delivery. Where infrastructure is required before a certain quantum of housing then this needs to be built into the Housing Trajectory assumptions.
10. The first year of delivery assumes a more realistic figure (50 dwellings compared to 300) and the final three years of delivery also seem more realistic. However, the assumption that 50 dwellings will be delivered starting in 2025/26 is unrealistic.
11. There will need to be many further reserved matters applications, Section 106 agreement(s), discharging of planning conditions and opening up works for each of the areas identified as part of the Masterplan and SPD. There is also the matter of the Colt's Hill Bypass and potentially Five Oak Green Bypass which would need to be finalised, tested applied for approval and not to mention the delivery of key utility infrastructure to support the development that would need to be put into place and the planning application process that precedes this.

12. The delivery of housing should not be assumed to commence until at least between 2029/30 and 2032/33. Depending on whether you assume 5 or 8 years of lead in time based on the Lichfields evidence this would result in a reduction of between 830 and 2,011 dwellings at STR/SS1.
13. The bulk of the delivery is assumed between years 2026/27 and 2033/34 with very similar delivery rates during these core years of the trajectory. In fact, the average delivery rates for these years is 254 dwellings per annum in the 2023 compared with 300 dwellings per annum in TWBC's previous trajectory. Six of these core years have only a very small difference in assumed delivery rate.
14. This assumed delivery rate is also at odds with the Lichfield evidence which confirms an average build-out rate of 160 dwellings per annum. TWBC is assuming an average delivery rate of nearly twice this amount. If one were to use the Lichfields delivery assumption of 160 dwellings average per annum it would take 15 years to fully deliver the housing in this location.
15. Taken together with the lead in times outlined earlier in this section and the resultant first year of delivery being say 2030 for the sake of argument, then 2045 would be the final year of delivery using a 160 dwelling average per annual assumption. This obviously extends well beyond the Local Plan period and has significant impacts on the ability of the Council to demonstrate even a 10 year housing supply.
16. The Town Council provides a critique of TWBC's past housing delivery against the assumptions in its trajectory demonstrating that the assumptions in the trajectory are not based on evidence of previous housing delivery as an authority. The delivery assumed over the next seven years will require higher delivery than has ever been achieved by TWBC.
17. Over the past three years TWBC assumed 2,689 dwellings would be delivered however only 1,842 dwellings were actually delivered. In other words, TWBC has misjudged the delivery of housing in the Borough by -847 dwellings over the previous two years.
18. Furthermore, the proposed allocation STR/SS1 (The Strategy for Paddock Wood and East Capel) is responsible for at least 40% of the housing supply in the Borough in years 2030/31 to 2034/35. For the years 2032/33 and 2033/34 it accounts for 52% of the anticipated housing delivery in the Borough. What is TWBC's contingency plan for meeting its housing requirements should there be any shortfalls in housing at Paddocks Wood against the housing trajectory? There appears to be a clear over reliance on a heavily constrained Paddock Wood to take on the housing delivery burden of the Borough across the plan period and in the core part of the plan period - with unrealistic housing delivery assumptions on top of this.

19. This imbalanced focus on housing delivery at Paddock Wood does not provide the diversity and market choice across the Borough that housing markets require to ensure they are healthy and robust. The overall impact of this lack of geographic choice in the market is that the delivery of housing at Paddock Wood is likely to be even slower than anyone's estimates.

Q3. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?

PWTC Response:

20. Yes it does, as included in the updated Housing Trajectory.

21. TWBC has proposed that its windfall allowance in the Housing Trajectory is increased so that an additional 520 dwellings are assumed in the supply up to 2038. It refers to the past four years of monitoring to justify its larger windfall site rates of delivery as 30 dpa

22. However, TWBC does not provide earlier data on this (prior to 2019)? Otherwise, it is difficult to recognise delivery trends over just four years. It appears that rather than look for alternative development sites in the rest of the borough outside of Paddock Wood that TWBC has looked to increase its windfall allowance instead.

Q4. Does the Plan identify specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan? If not, how many years' worth of supply does it identify?

PWTC Response:

23. It would appear that across the years 6-10 and 11-15 of the Plan that development proposed at Paddock Wood and East Capel comprises the bulk of identified development.

Q5. As modified, would the Plan be positively prepared? Would it provide a strategy, which, as a minimum, seeks to meet the area's objectively assessed needs?

PWTC Response:

24. As we have set out in our representations and hearing statements it is not a positively prepared Plan and it does not seek to meet its objectively assessed needs.

25. Given that this is still such a fundamental question being asked at this very advanced stage of the Examination demonstrates that the Plan is not sound, and

it is not seeking to meet the area's objectively assessed need. TWBC has sought to meet the majority of its housing needs in two locations (Paddock Wood and Tudeley Village) which were never justified through technical evidence of their suitability and deliverability which has been revealed through the Examination process (and continues to be revealed). We are now left with a proposed Plan and Strategy which is in disarray and cannot demonstrate that it can even deliver enough homes in a 10 year plan let alone a minimum of a 15 year plan as required by national policy.

Q6. If not, how could the Plan be modified to make it sound?

PWTC Response:

26. Given the fundamental flaws with the Plan and TWBC's chosen spatial strategy, modifications to the plan will not make it sound. A natural conclusion at this point is for the Plan to be withdrawn and for TWBC to recommence the Plan preparation so that the required growth in the plan period can be developed.

ISSUE 2 – Five Year Housing Land Supply

Q1. What will be the five-year housing land requirement upon adoption of the Plan?

PWTC Response:

27. This depends on a number of factors which are explained below:

Five-Year Housing Land Supply Statement (2022/2023)

28. The latest Five-Year Housing Land Supply Statement (2022/2023) dated October 2023 concludes a housing land supply of 4.29 years. This Statement includes a housing windfall allowance of 152 dwellings per annum based on:

- A small sites (less than 10 dwelling schemes) windfall allowance of 122 dwellings per annum across the Plan period; and
- A large sites (10 or more dwelling schemes) windfall allowance of 30 dwellings per annum.

29. This is an increase of 30 dwellings per annum compared to previous windfall allowances.

30. It is noted that TWBC does not include a windfall allowance for years 1-3 as they explain this may create double-counting with extant consents that could be built-out during this period.

31. The calculation of a 4.29 years of housing supply includes the windfall allowance of 152 dwellings per annum however the justification for this is still in question as part of this examination. If there is no justification for this then the five-year housing land supply will be further negatively impacted.

Forthcoming Five-Year Housing Land Supply Statement (2023/2024)

32. The Five- Year Housing Land Supply Statement (2022/2023) states that an updated housing land supply position will be published post adoption of the Local Plan and it states this is expected “around late 2024”.
33. Based on the current 4.29 years of housing land supply and the anticipated publication of the 2023/2024 Statement the Local Plan would not have a demonstrable 5 years of housing supply. This is of course notwithstanding any additional supply that might have been recorded in 2023/2024.

Lapse Rates

34. We are not able to locate lapse rate assumptions in the Five-Year Housing Land Supply Statement. It does not appear to make any provision for planning applications that might lapse over the next five years. A lapse rate should be evidence based and applied to any applications that have not commenced development. This could result in a reduced housing land supply position.

Q2. Based on the latest housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

PWTC Response:

35. The points made in our response to Q1 will need to be factored in. Using the latest trajectory (without taking these points above into consideration) the most logical years to use to calculate the five year housing land supply are 2025/26 – 2029/30. The supply for these years in the trajectory is **4,238 dwellings**. However, this does not include any shortfalls from previous years.
36. It is notable that STR/SS1 (The Strategy for Paddock Wood and East Capel) comprises 1,421 of these dwellings or 34% of the overall supply.
37. We also note that the five- year housing supply would be largely comprised of Extant Planning Permissions (1,267 dwellings) and Windfall Allowances (608

dwellings) totalling 1,875 dwellings. This is 44% of the five-year housing land supply.

38. When Paddock Wood, Extant Planning Permissions and Windfall Allowances are combined this total 3,296 dwellings or 78% of the overall supply during this period.

39. **It is quite clear that the five-year housing land supply is dependent on the ability of TWBC to demonstrate that the housing at Paddock Wood is deliverable along with the required infrastructure at key trigger points.**

Q3. Where sites have been identified in the Plan, but do not yet have planning permission, or where major sites have only outline planning permission, is there clear evidence that housing completions will begin within five years?

PWTC Response:

40. As these are major sites this evidence should be provided for each site to clarify this as this is critical for determining whether the suggested housing land supply assumptions are robust.

Q4. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward as expected in the first five years?

41. Please see our points above regarding windfall sites. As there are 608 windfall dwellings assumed in the first five years after adoption this equates to 14% of the supply which is considerable - on sites that are not identified.

Q5. Will there be a five-year supply upon adoption of the Plan? If not, is the Plan sound?

42. The above factors need to be taken into consideration before this can be determined.

ISSUE 3 – Housing for Older People and People with Disabilities

Q1. Considering the conclusions reached in paragraphs 89-92 of the Inspector’s Initial Findings, how can the Plan be modified to rectify the soundness issues identified?

Q2. What implications will the Council’s suggested changes to the Plan have on the provision of housing to meet the needs of older people and people with disabilities?

Q3. In the event that needs will not be met, how can the Plan be modified in order to make it sound?

PWTC Response:

43. We note that the evidence used to calculate the need for housing for Older People and People with Disabilities is based on the period of 2022 – 2038 (see paragraph 13.10 of PS_054). If the Local Plan period is extended by at least two years as set out in our representations, then this requirement will need to be increased to cover these years.

44. TWBC states that there will be a shortfall of 61 units over the plan period and that this is equivalent to ‘only about 2 years’ worth of need and it suggests that this may be addressed through the Local Plan review, if further windfall sites do not come forward in the interim. It explains that ‘only’ one or two windfall schemes would be required to meet this shortfall of 61 units. With an extended plan period this shortfall will be increased and is most likely to require another allocation(s) to address this shortfall.