

Paddock Wood Town Council

Matter 14 – Sustainable Design and Heritage and Conservation (Policies STR2, STR4, STR7, EN1, EN2, EN3, EN4, EN5 and EN7)

ISSUE 1 – Design and Design Standards

Q1. Is it necessary and justified for all development proposals to include supporting statements to demonstrate compliance with the wide range of factors referred to in Policy EN1?

PWTC Response:

1. No Comment.

Q2. What is the justification for a Construction Environmental Management Plan for all developments over 20 units / 2,000 square metres?

PWTC Response:

2. The Town Council supports this proposal but recent experience has indicated that that such Plans are pointless unless adequate resources are dedicated to enforcement of the implementation of the measures included within them.

Q3. How would a decision-maker determine whether materials had been sustainably sourced by local suppliers for the purposes of Policy EN1(1)(5)?

PWTC Response:

3. The Town Council would be interested to know this as it has been noted in recent local developments that materials are, in many cases, coming in from outside the UK. The Town Council's main concern is the policy would not be enforced.

Q4. Is it sufficiently clear what is required of Policy EN1(1)(12)?

PWTC Response:

4. No. There is no need for the policy to refer to behaviours. It should instead focus on the provision of water fountains. The policy should establish in what instances development proposals might be expected to provide fountains and whether there are any criteria associated with the design and placement of these, such that they don't cause visual intrusion or hinder movement for example. The criteria

also implies that other initiatives might be supported that influence behavioural change, but without noting what these are. The policy should be clearer on this.

Q5. What is the justification for requiring development proposals to meet the tighter Building Regulations optional requirement for water? Is it clear what is required in this regard?

PWTC Response:

5. No Comment.

Q6. What is the justification for considering planning applications ‘more favourably’ which can demonstrate that views expressed in pre-application engagement have been ‘properly considered’?

PWTC Response:

6. PWTC has considerable concerns regarding pre application engagement with the LPA as the process is not transparent and is not documented or recorded within the supporting papers for planning applications.

7. PWTC is concerned that the Council would look more favourably on applications if the pre-application process was simply a ‘tick box’ exercise. In TWBC’s experience little note is taken of community input.

ISSUE 5 – Climate Change Mitigation and Adaptation

Q1. Is Policy EN2 justified, effective and consistent with national planning policy?

PWTC Response:

8. It is noted in Policy EN2 that meeting the residential standards is encouraged rather than required. The Town Council support such an approach, recognising the constraints imposed on plan-makers through the 2015 Ministerial Statement.
9. It is anticipated that the Future Homes Standard will be published in the foreseeable future and, as far as possible, policy should support any residential development that comes forward in advance of this as being Future Homes Standard 'ready'. It would be helpful if the Local Plan could be clear on how this aligns with the Home Quality Mark (or replace reference to the Home Quality mark with the Future Homes Standard).

Q2. Is it clear to decision-makers, developers and local communities what standards are required as part of residential development proposals?

PWTC Response:

10. The Town Council believes that the standards are not sufficiently clear or robust. They should make clear that residential development should always be built with photovoltaic panels, brown water systems and either full heat pump technology or hydrogen ready boiler systems.

Q3. The PPG (Paragraph: 012 Reference ID: 6-012-20190315) refers to the Written Ministerial Statement on Plan Making dated 25 March 2015. It clarified the use of policies on energy performance standards for new housing developments. The Statement sets out the Government's expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix). Is Policy EN3 consistent with this approach?

PWTC Response:

11. See response to Q2.

Q4. Is Policy EN3 justified, effective and consistent with national planning policy?

PWTC Response:

12. No Comment.

ISSUE 3 – Heritage and Conservation

Q1. Are Policies EN4 and EN5 positively prepared, justified, effective and consistent with national policy, in particular paragraphs 194-208 of the Framework?

PWTC Response:

13. Policy EN4 states that ‘all development’ shall contribute to the overall conservation and, where possible, enhancement, of the historic environment. Equally, the criteria set out in the policy are stated as applying to ‘all proposals’. This is not appropriate and should instead refer to those proposals that may affect the historic environment. The policy links back to a list of documents that include information on the historic environment, but the policy should be clearer on establishing what is considered to be of importance, and where. As stated, the policy could place additional burdens on applicants and preclude opportunities for innovative design.

ISSUE 4 – Heritage and Conservation

Q1. Paragraph 136 of the Framework confirms that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. Is this adequately reflected in Policy EN7?

PWTC Response:

14. No Comment.

ISSUE 5 – Ensuring Comprehensive Development

Q1. What is the justification for Policy STR4 and will it be effective in ensuring comprehensive development?

PWTC Response:

15. The policy should be reordered to clarify when and where the requirement for comprehensive development. The Town Council agrees this is necessary for the large scale growth of Paddock Wood and where multiple land ownerships are involved. Such an approach is also necessary for the Town Centre.

16. It is questioned whether a separate policy is required as this requirement could instead be incorporated in policies relating to specific sites and allocations, with the criteria in those policies clarifying what the expectations are for achieving a comprehensive approach to development on those sites. This could, subject to the site, relate to matters such as an integrated movement network, green infrastructure and delivery of social infrastructure.

17. The weakness inherent in allowing masterplanning to be addressed later in SPDs renders this policy ineffective and unjustified.