

## **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?**

1.1 Policy STR/SS 1 looks to address the development issues affecting the development of the land within east, west, north, and central Paddock Wood. The relevant components of policy STR/SS1 as identified on Map 27 of the submission plan have, in many instances very different policy aspirations and requirements for instance the wetland park to the west and the links between the town centre and the employment areas to the north. As set out in our reps on the Reg 19 plan, rather than dealing with these in an overarching policy, it would in our opinion be more appropriate to have specific policies relating to each development area, with an overarching set of guiding principles and infrastructure requirements. This would make it a lot easier for local residents to understand and appreciate what is intended in each area and remove any ambiguity for site promoters. And is something we and the other site promoters have endorsed for some time.

**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?**

2.1 The SA looked at alternative directions and scales of growth in Paddock Wood<sup>1</sup>. David Lock Associates (DLA) in producing the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) sought to base their Masterplan proposals on the land they knew to be available through the SHELAA, but in a land ownership blind way so as to given them free rein in masterplanning the area.

**Q3. Is it clear to developers, decision-makers and local communities what scale and mix of uses are proposed on each parcel (including the amount of employment land)?**

3.1 We don't think it is particularly clear – hence our view that policy STR/SS 1 should be substituted by a series of area specific policies dealing with what is required of the land to the north, east and west of Paddock Wood so that local residents in particular are clear as to what is proposed and where.

#### *Green Belt*

**Q4. In the Green Belt Study Stage 1, how was parcel PW1 defined? Was land to the west of Paddock Wood, up to the A228 considered at this stage?**

No Comment

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<sup>1</sup> See 6.2.37 - 6.2.45, figures 7/8 and table 29.

Q5. In the Green Belt Study Stage 3, Map 2 identifies that releasing land to the west of Paddock Wood will cause 'moderate' harm nearest the existing settlement, with 'high' levels of harm on roughly the western half of the parcel nearest the A228. What are the reasons for this and how have the findings been taken into account in the preparation of the Plan?

No Comment

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?

No Comment

Q7. Taking into account the answers provided under Matter 4, do the exceptional circumstances exist at site specific level to justify amending the Green Belt boundary in this location?

No Comment

### *Flood Risk and Drainage*

Paragraph 4.11 of the Strategic Sites Topic Paper<sup>13</sup> states that "...the starting point was to focus development using a proportionate application of the sequential test in flood risk terms i.e., the majority of residential development in flood zone 1, with some in flood zone 2 where there was confidence in site specific flood mitigation ensuring that was acceptable."

Paragraph 4.14 then goes on to state that "A scenario was run with residential development in flood zone 1 only (Option 3). This provided fewer dwellings, 2,840, and was considered unnecessary in the context of planning guidance on locating development in appropriate flood zones."

Q8. What is a 'proportionate application of the sequential test'? Is the allocation of land to the west of Paddock Wood consistent with paragraph 162 of the Framework, which states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding?

8.1 Please see our response to Matter 5 issue 1 question 5 re the proportionate application of the sequential test.

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

9.1 The vast majority of the parcel allocated to the east of Paddock Wood falls within Flood Zone 1, and it is intended that this will encompass the proposed residential development. If any development encroaches within Flood Zones 2 and 3 adequate flood risk mitigation measures which have been established through detailed site-specific hydraulic modelling, including the impact of climate change, and which consist of flood resistance measures (e.g. raised finished floor levels) in combination with the provision of compensatory flood stage areas will be introduced. This will ensure the safety of the

development for its lifetime, without increasing flood risk off site, in accordance with National and Local Planning Policy requirements with respect to flood risk.

**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?**

10.1 A drainage strategy is a planning requirement for any site of this size. As such the development couldn't be consented unless supported by a drainage strategy that demonstrates no increase in flood risk. The details of the strategy can then be secured by way of planning condition as the design develops. A site wide drainage strategy for both surface and foul water has been developed for the parcel allocated to the east of Paddock Wood in consultation with the LLFA, the EA, the IDB and SW and where a shortfall in the existing local sewage infrastructure was identified, adequate infrastructure provision has been included within the masterplan area.

#### *Mix of Uses and Infrastructure Requirements*

**Q11. How have the type and location of community uses been established? For example, what is the justification for the proposed sports hub (including a 25m swimming pool) and why is it in the location proposed?**

11.1 As set out at para 6.2 of the Strategic Sites Topic Paper (CD3.67), TWBC appointed DLA to prepare an Infrastructure Framework to identify the infrastructure provision for the Strategic Sites. As further explained, this provision encompassed two areas: 1) infrastructure required to mitigate the impacts on existing areas of development; and 2) infrastructure that was required to ensure the new development met the Plan's policy objectives and the garden settlement principles.

11.2 The Strategic Sites Topic Paper also explains that the initial starting point was the formation of a baseline position from a review of draft Local Plan policy, KCC policy, and KCC highway schemes. In addition, the masterplanning helped establish a list of required improvements to highways and sustainable travel infrastructure to support the proposed Structure Plan.

11.3 The final list of Infrastructure requirements include, but are not limited to:

- Colts Hill improvements
- Five Oak Green bypass
- Sustainable transport works
- Flood alleviation works at Paddock Wood and east Capel
- Sports and recreation facilities
- Education facilities – both primary and secondary
- Health facilities

11.4 As set out in the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) some of these items are shared across both allocations at Tudeley Village and Paddock Wood and east Capel, some are to be shared across Paddock Wood and east Capel only, and some are to be provided at Tudeley only.

11.5 The main community facilities proposed on the land to the east of Paddock Wood include the land for the primary school, land for the secondary school expansion and the proposed local centre. The land to the west also includes land for a primary school, 2 local centres and a 10ha sports hub including indoor swimming pool. Para 5.56 explains that the councils Open Space SPD requirement is 1.1ha sports field provision per 1,000 people for new developments, and that for a development of 3,500 homes, you would require between 9.2ha and 10ha. Thus the sports hub addresses the requirements of the whole of the Paddock Wood and east Capel allocation.

11.6 Para 5.57 of the Strategic Sites Masterplanning and Infrastructure Study goes on to explain that the decision to concentrate the new leisure facilities in a single location in the southwest was associated with a desire to optimise economies of scale, maximise accessibility within Paddock Wood by active means, and provides a beneficial use for land which otherwise would be constrained by flood zone constraints. It also suggests that locating this facility in the south-west enables a softer edge to a revised Green Belt boundary to be created.

11.7 What is not clear is why an indoor pool was also required as para 5.11 of the Strategic Sites Masterplanning and Infrastructure Study appears to infer that it addresses a desire to upgrade/ enhance the existing facilities in the town. A position that appears to be supported by para 8.42 of the Councils Retail and Leisure Study (April 2017 – CD 3.86) which indicates the existing need for a new swimming pool in Paddock Wood, independent of any new allocations; and the Council's Indoor/Built Sports Facility Needs Assessment (June 2018 – CD 3.26b) which indicates the requirement for a new 25m swimming pool in Paddock Wood, to meet current and future growth. Given the above, unless required to address the exceptional circumstances test the requirement to provide an indoor pool is not in our opinion justified and should be deleted from policy STR/SS1.

**Q12. In the location envisaged, will the sports hub be accessible to existing and future residents of Paddock Wood by sustainable modes of transport?**

No Comment

**Q13. What is the justification for the inclusion and location of sites proposed for gypsy and traveller accommodation?**

13.1 As set out in our reps on the Reg 19 plan we do not believe the need for the provision of 'three-pitch gypsy/traveller site (to include one mobile home and one touring caravan per pitch).' on the western parcel (to the north of the railway line) and eastern parcel as shown on Map 27 has been justified. Annex 1 of the Housing Supply and Trajectory Paper (CD 3.74) identifies a number of gypsy/traveller sites located in close proximity to the eastern parcel, including Lucks Lane (p19), Mile Oak Stables (p27), Pearsons Green Road (p37), Vines Farm (p43), and Willow Stables (p47). The need for another facility in this area is thus questionable, especially when it is also clear from para 6.59 of the Housing Supply and Trajectory Paper that there are in fact sufficient sites to meet the need without requiring any provision on the STR/SS1 sites.

13.2 In addition, we note that Map 28 – the Paddock Wood and East Capel Structure Plan appears to suggest that the proposed site on the eastern parcel is located to the rear of Ledgers Cottage's and the former Ledgers Commercial Motor Services site on Queen

Street, within what is SHLAA site 47, which whilst identified in the SHLAA as forming part of Local Plan Allocation STR/SS 1, does not fall within the land being promoted by Redrow and Persimmon and is not, as far as we are aware being actively promoted by anyone else. Whilst the deliverability of this facility could thus be called into question, we would also highlight the fact that initial masterplanning for the wider east of Paddock Wood site has no direct access onto Queen Street and as such is not well positioned to accommodate a gypsy/traveller site. Furthermore para 6.390 of the pre submission plan is clear in terms of site suitability and layout for gypsy/traveller sites, making it clear that, in setting out their policy, TWBC have had to have regard to the potential for noise and other disturbance from the movement of vehicles to and from the site, the stationing of vehicles on the site and on-site business activities; and that proposals should not detract from the amenities or privacy of neighbouring uses. Whilst the indicative location shown on Map 28 may have been able to meet these criteria, we do not believe placing such a facility within the heart of the wider development will contribute to the garden settlement principles and design objectives policy STR/SS1 looks to promote for the land east of Paddock Wood.

13.3 In the context of the above we note that the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) at para 5.60 suggest that:

*'Draft policy also requires provision of a serviced Gypsy & Traveller site of 3 pitches. Location of this facility remains flexible within the Structure Plan, however the following assumptions about location have been made:*

- *Travelling (transitory) pitches should be located adjacent to the A228, ideally in the northwestern parcel*
- *Permanent pitches should be located in the south-east of the site, adjacent to Church Lane'*

13.4 The area identified on map 28 does not reflect the above, which given our comments about the SA (below), only adds to the confusion as to what is required, and the associated justification for it.

13.5 The SA (CD\_3.156) at table 112 in assessing the options considered for gypsy and traveller accommodation identifies the chosen option as one that looks to focus on intensification / extension of existing sites, rather than new allocations, which given the provisions of Policy H9 and STR/SS1 is somewhat confusing. Indeed, the accompanying text makes no reference to provision on the proposed strategic allocations at Paddock Wood, such that the need for the proposed pitches on STR/SS1 does not in our opinion appear to be justified

**Q14. Where will the proposed sheltered and extra care accommodation be located? For effectiveness, should this be set out in the Plan?**

14.1 It is not clear from policy STR/SS1 or the associated Master Plan and David Lock Associates Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) where any sheltered and extra care accommodation would be located. All part 4 of policy STR/SS1 states is that the strategic sites make *'provision for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of older people'* and that; *'At least one sheltered and one extra care housing scheme shall be provided within the strategic site'*.

14.2 Whilst there does not appear to be any particular geographical preference for this form of accommodation, and to date this matter has not arisen as far as discussions about land to the east of Paddock Wood are concerned, I can confirm that Redrow include within its range the lifestyle product which is designed to accommodate the elderly wishing to downsize, offering fewer but larger bedrooms with en-suites and walk in wardrobes; and that it has also been noted that some form of sheltered or extra care facility could be incorporated into the local centre as part of a mixed use community, with the details being resolved through the proposed SPD. To this end para 2.9 of the SoCG on Delivery and Funding of Shared Infrastructure advises that *'It is recognised by all the Paddock Wood and east Capel Parties that this is a requirement of Policy and that this provision is required within the overall allocation. The Parties are considering this as part of its Masterplanning and will continue to engage and discuss with the Council on this matter'*

### *Highways and Transport*

**Q15. How will the north-south pedestrian and cycle link over the railway line be provided as part of the western parcel? Is it deliverable?**

No Comment

**Q16. How will the necessary financial contributions towards works to the A228 and the Five Oak Green bypass be calculated for each site and Tudeley Village (Policy STR/SS3)?**

16.1 Section 6 of the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) reviews 3 options for the Colts Hill bypass:

Option 1: Fully Offline Colts Hill Bypass

Option 2: Online Improvements

Option 3: Local Bypass of Colts Hill

16.2 Table 8 of the Strategic Sites Masterplanning and Infrastructure Study compares the three options in terms of viability, deliverability, phasing/timing, capacity, policy compliance, social impacts, and environmental impacts. At para 6.32 it states: *'The comparison between the three options reveals that none is fully favourable, and each option would result in impacts. However, on balance, Option 3 is preferable in relation to options 1 and 2. As a result of this analysis, Option 3 is recommended to be taken forward (Local Bypass of Colts Hill) for growth Scenarios 1 and 2, as it offers the improvements in safety and capacity required to mitigate the impact of development, but with less environmental impact than Option 1. It significantly reduces the cost burden on development, and does not prejudice the delivery of the full KCC scheme in the future, should funding be secured.'*<sup>2</sup>

16.3 Tables 11, 13 and 15 of the Strategic Sites Masterplanning and Infrastructure Study set out the different infrastructure requirements for the growth scenarios. As set out in our reg 19 reps the proposed Colts Hill Bypass is recommended for growth scenarios 1 and 2 (see tables 11 and 13) . It is not clear why this would not be required for growth scenarios 3 (table 15) or whether the on line improvements would be sufficient to address the impact of

<sup>2</sup> Para 6.2 of the Strategic Sites Masterplanning and Infrastructure Study indicates that the three growth scenarios are:

- i. Paddock Wood and east Capel, and Tudeley Village both going forward.
- ii. Paddock Wood and east Capel only
- iii. Tudeley Village only

the expansion of Paddock Wood and Capel in isolation. Likewise the Five Oaks Green bypass is related to the Tudeley development only – see para 6.34.

16.4 The Infrastructure Delivery Plan (CD 3.71) suggests on p129 that the Colts Hill Bypass (part on-line/part off-line scheme) as recommended in the Strategic Sites Masterplanning and Infrastructure Study is estimated to costs circa £20 million and that it will be funded purely from developer contributions.

16.5 Whilst it has been agreed in principle between those promoting the strategic sites in Paddock Wood and Tudeley to share the costs of the proposed infrastructure works<sup>3</sup>, the mechanism for this cost sharing and the associated mechanism for dealing with phasing, and triggers for short, medium, and longer terms costs has yet to be resolved<sup>4</sup>. This will, as set out in the submission plan (para 5.194) be refined through the SPDs to be prepared for each Strategic Site. Any such agreement being without prejudice to our respective positions on the baseline assumptions contained in the viability assessment work and a detailed review of the robustness of the cost estimates contained in the viability appraisal.

16.6 As to the other highways works in and around Paddock Wood that are required to support local plan development, as set out in the TWBC Live Draft Infrastructure Delivery Plan, these will be secured via a combination of sources including developer contributions, the Local Growth Fund (South East Local Enterprise Partnership), Major Roads Network Programme (Department for Transport), Housing Infrastructure Fund, Local Transport Plan 4 funding (Kent County Council) and Transport for the South East.

**Q17. What will be the main point of access for the parcel to the east of Paddock Wood? How will pedestrian, cycle and vehicular accessibility to the rest of Paddock Wood (to the west) be achieved?**

17.1 For vehicles, the site will be accessed principally from a staggered crossroad junction on Church Road. From this junction a main boulevard route will run north serving all dwellings in the northern land parcel. The boulevard will also run southwards from Church Road and join Mascalls Court Road. Simple priority junctions will be formed with the boulevard to serve the development parcels to the north and south of the site. The principal vehicular route between the site and the centre of Paddock Wood will be via Church Road.

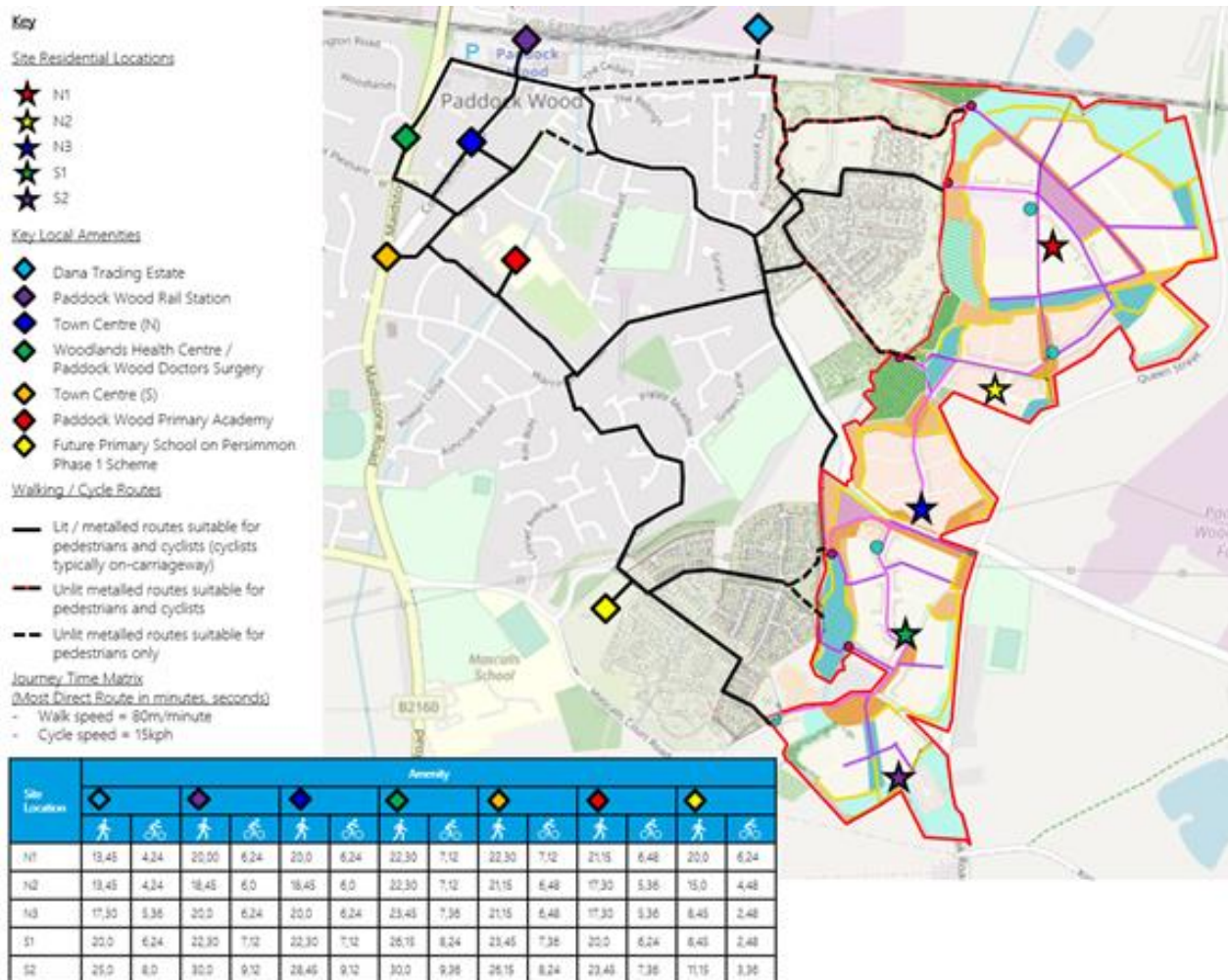
17.2 In respect of pedestrian and cycle connectivity key linkages will be made through enhanced / new connections, including to the PROW network, particularly to the west leading to and from Paddock Wood town centre with its amenities and rail station. The image below plots five locations within the masterplan site (3 to the north of Church Road, 2 to the south) and demonstrates onwards routes by foot / cycle to key amenities (or groups of amenities) within Paddock Wood. From each point journey times for the most direct route by foot and cycle to each amenity have been established within the accompanying table. The image highlights the direct nature of the connections made and the array of daily journeys that could feasibly be made on foot or by cycle.

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<sup>3</sup> Please see the SoCG on the Delivery and Funding of Shared Infrastructure

<sup>4</sup> See comments on matter 9 – issue 2 question 6

17.3 A dedicated bus, pedestrian, and cycle only link is also proposed between the northern part of the land east of Paddock Wood and the adjacent Church Farm development to provide a new route east/ west linking the site with the town centre. Agreement to the provision of this crossing has been reached with the adjacent developer and heads also exchanged, such that a formal legal agreement is anticipated shortly



**Landscape and Heritage**

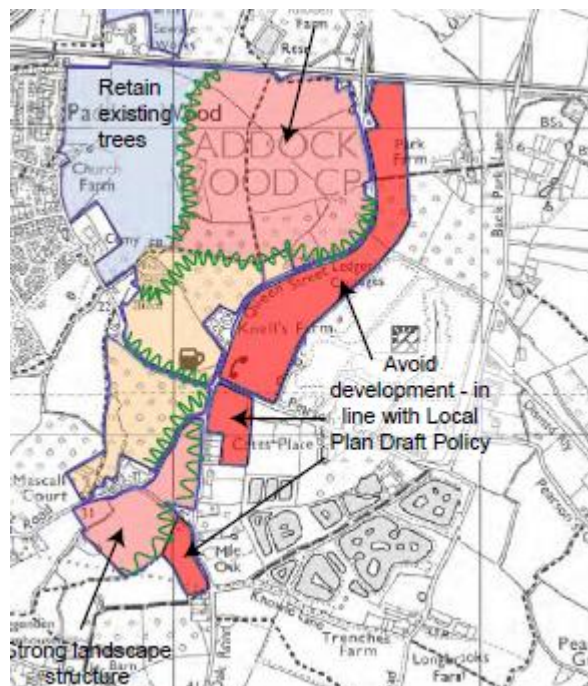
Q18. The AONB Setting Analysis Report identifies areas of ‘very high’, ‘high’ and ‘medium’ sensitivity within the allocated site boundary to the east of Paddock Wood. Very high is defined as likely to cause harm to the setting of the High Weald AONB which it may not be possible to mitigate against.

What is the justification for including the parcel of land to the south of the site, where the Report recommends avoiding any development?

18.1 Whilst the AONB Report categorises the south eastern section of PW1\_11 as a ‘very high sensitivity area’, and advises that “development in this location is likely to harm the setting to the AONB. It may not be possible to mitigate against harm in this location”; this is



qualified at para 6.1 which suggests that Paddock Wood - sites PW1\_7-11 have the potential to adversely affect the setting to the AONB – if **no mitigation** is put forward. It is also acknowledged at para 6.3 that further detailed studies should inform the future development of the allocation sites; whilst para 4.122 states: *'There is the potential for the proposed development to the east of Paddock Wood to harm the setting of the High Weald AONB, however if the stipulations set out within the draft policy are adhered to and a strong and coherent masterplan is developed, with an appropriate landscape structure, the medium and long term effects of the draft allocation may not be significant'*



18.2 The AONB Setting Analysis Report pre dates the detailed landscape and visual assessment of the eastern parcel that has been conducted both by DLA to inform the Local Plan and to a greater degree by the developers of the eastern parcel in consultation with TWBC. Para's 4.119, 4.127, 4.132 and 5.53 of the Strategic Sites Masterplanning and Infrastructure Study produced by DLA demonstrate that the findings of the AONB Setting Analysis Report were taken into account by DLA in preparing the strategic sites masterplan.

18.3 Paragraph 4.1.10 of the AONB Report states that: *"Rather than looking at allocation sites on an individual basis, this report will focus on viewpoint locations where one or more of the allocations may be visible from the AONB or might obstruct views back towards the AONB."*

18.4 Para 4.1.19 continues: *'views from the 'Millenium Viewing Point'<sup>5</sup> are critical in establishing the acceptability of the future masterplan proposed within draft policy AL/PW1, particularly with regards to parcels PW1\_7-11'*

<sup>5</sup> Photograph location P3 of the AONB Study.

18.5 The detailed assessment of the eastern parcel that has been conducted both by DLA and the site promoters in consultation with TWBC has concluded that there are no clear views from within the AONB to the allocation area east of Paddock Wood.

18.6 The AONB Report also acknowledges that views back toward the AONB are important and that obstruction of these may lead to adverse effects – the eastern parcel has scope to retain these views in part which are highlighted in the pre-submission local plan Strategic Sites Masterplanning and Infrastructure Study (CD 3.66a) where development is illustrated within PW1\_11 at Figure 10 and subsequently at Map 28 Paddock Wood and East Chapel Structure Plan.

18.7 The area within PW1\_11 categorised as ‘high sensitivity’ has scope to include a view corridor between Mascalls Court and the area close to the Millennium Viewing Point - the wooded ridge of the AONB. There is also scope to include suitable mitigation in the form of structural woodland planting within the southern perimeter of these parcels in keeping with local landscape character which would reduce visibility and ‘soften’ the future built form.

18.8 The parcel within the southern tip of the Eastern Parcel (part of PW1\_11) that falls within the category of ‘very high sensitivity area’ is in fact when viewed from the ‘Millennium Viewing Point’, relatively well screened by intervening vegetation, and built development south of the Eastern Parcel along Mile Oak Road which limits the visual relationship with the AONB. As a result it is considered that this parcel is not of ‘high sensitivity’ and has capacity to be developed with appropriate mitigation. Whilst para 4.1.21 of the AONB Report identifies a number of design measures that would reduce the predicted effects on the setting to the AONB, given the more detailed assessments that have now occurred mitigation could include: planting to help provide additional visual containment and /softening, proposals that only develop a small portion of the parcel; and development of low density in keeping with local character – as currently proposed by Persimmon and discussed and agreed with officers of TWBC as being acceptable.

**Q19. In the areas of ‘high’ and ‘medium’ sensitivity, what mitigation is required and are the requirements sufficiently clear to users of the Plan?**

19.1 Mitigation required within the eastern parcels categorised as ‘high’ and ‘medium’ sensitivity would in our opinion also need to have regard to the advice in para 4.1.21 of the AONB Report, and:

- Ensure key views out from the eastern parcel are included within the masterplan
- Include structural planting to the eastern and southern edges of the eastern parcel to help provide visual softening to the new settlement edge
- Include retained vegetation as part of new green corridors within the eastern parcel to help ‘break up’ the massing of the new built development.

19.2 Mitigation measures are suggested at Map 28 of the Submission Local Plan and in the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) illustrating views out of the eastern parcel and structural planting locations. The Local Plan suggests this should be confirmed through detailed assessment, which has occurred as the proposals for the land east of Paddock Wood have progressed in consultation with the council’s landscape officer.

**Q20. Will the proposed mitigation be effective? What potential impacts will the allocation as a whole have on the setting of the AONB?**

20.1 We believe the proposed mitigation will help assimilate the proposals within their landscape context by softening the overall built development and retaining key features of the visual relationship between the eastern parcel and the AONB. As such we believe the land to the east of Paddock Wood, together with that to the west will not adversely affect the setting of the High Weald AONB.

**Q21. What potential impacts will the proposed allocation have on the significance of designated heritage assets, having particular regard to the Grade II listed buildings at Badsell Manor Farmhouse, Mascalls Court, Mascalls Court Lane and Knell's Farm? How have heritage assets been taken into account in the preparation of the Plan?**

21.1 Numerous designated built heritage assets are located within c.1km of the proposed allocation site to the east of Paddock Wood – see below.

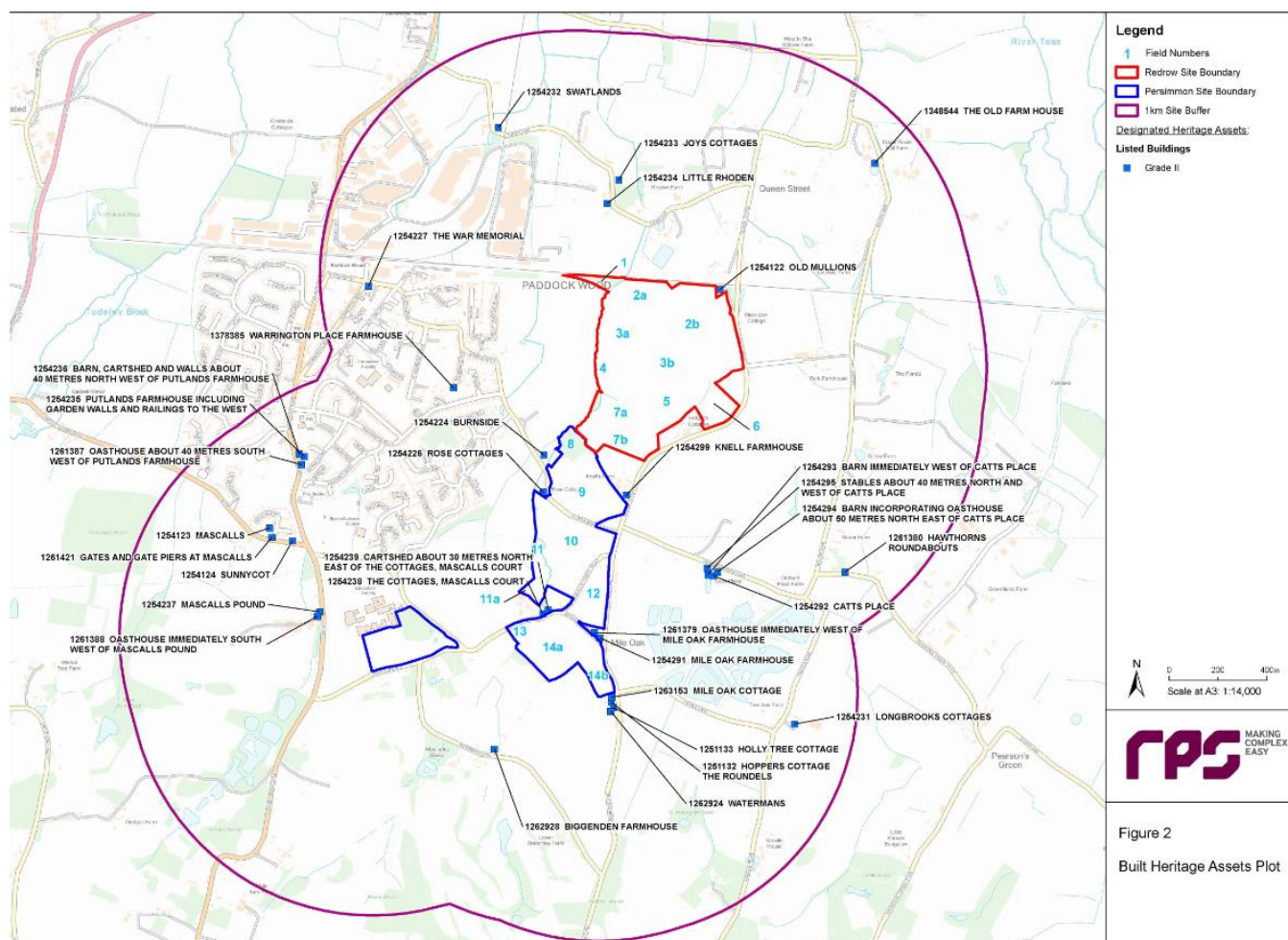


Figure 2  
Built Heritage Assets Plot

21.2 The SA (CD3.62) in reviewing the urban extension growth options at Paddock Wood including land in east Capel (table 29) in commenting upon heritage impacts states:

*'Variation in heritage scores reflect the increasing land take required across the four options and thus negative impacts that would occur largely upon the setting of heritage assets, with assets in the south being most sensitive. However, for all options it was felt that the master planning approach could help ensure a strategy for enhancements was realised'*

21.3 The Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) acknowledged the importance of the built heritage assets in and around the proposed strategic allocations in Paddock Wood when drawing up the proposed structure plan - see for example paras 4.114, 5.4 and 5.26.

21.4 Redrow and Persimmons heritage consultants (RPS), have, following detailed built heritage assessments advised that whilst the proposed allocation site and immediate vicinity has remained in agricultural use since the Medieval period, the legibility of historic ownership, occupancy and functional relationships that had existed between the proposed allocation site and some surviving built heritage assets, has been considerably eroded through the loss of hedgerows and other boundaries, and changes in the nature of agricultural production/cultivation in the 20th Century.

21.5 It remains however that the proposed allocation site, as part of a wider semi-rural, rural-agricultural landscape, contributes to the appreciation of the historic function of the relevant built heritage assets and/or compliments their vernacular built fabric. Given the above, RPS have concluded that the proposed allocation of the land to the east of Paddock Wood is likely to result in less than substantial harm to the significance of several designated built heritage assets, comprising:

- The Grade II Rose Cottages
- The Grade II Farmhouse and Cartshed at Mascalls Court
- The Grade II Knell Farmhouse

21.6 They have also advised that the potential levels of harm arising from the proposed allocation are considered likely to lie at the lower end of the spectrum of less than substantial harm and would arise primarily from the general erosion of the agricultural character of the site and expansion of the settlement area of Paddock Wood. The intrinsic architectural and historic interest of the relevant designated built heritage assets, as derived from their pre-20th Century built fabric would remain unaltered. Measures to avoid and minimise harm could in addition, be embedded within any future development as an integral part of the application. These measures could also be secured through the adoption of the proposed SPD's and/ or Design Codes to address built scale and massing, landscaping, alternative land uses and the layout of built areas. All of which has been discussed and agreed with officers of TWBC during the detailed design of the masterplan for the land east of Paddock Wood.

21.7 In the context of the above it should be noted that the proposed development east of Paddock Wood provides an opportunity to generate positive heritage effects via the retention and raising of public appreciation of the 'Hop Pickers' Branch Line and the non-designated barn building within the southern part of the site.

## Other Matters

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

22.1 Policy STR/SS1 indicates that the SPDs will set out guidance to show how the policy requirements, together with other policies within the Local Plan, should be delivered on the proposed strategic site at Paddock Wood, as well as provide guidance on design, phasing, and site access arrangements to ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood.

22.2 Para 5.196 of the submission plan indicates that these will be prepared with input from land promoters, local communities, and infrastructure and key service providers; and are intended to provide a framework to how the policy requirements of this Local Plan can be incorporated into the new settlement in order for it to attain the garden settlement objectives in relation to the development, and how these will relate to the neighbourhood development plans being produced by Paddock Wood Town Council and Capel Parish Council. It also indicates that the intention is that these SPD's are adopted before any planning permissions for substantial new development at that part of Paddock Wood and east Capel are granted unless exceptional circumstances arise.<sup>6</sup>

22.3 The principle of progressing an application in line with some form of design guidance reflects the aspirations of para 73 of the NPPF which indicates that when planning for significant extensions to existing villages and towns LPA's should  
*'c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community'*

22.4 Unlike Design Codes (see para 128 and 129 of the NPPF) the SPD is likely to be more far reaching and as such careful consideration needs to be had to when it is produced and how it evolves relative to the development of the proposed strategic allocations. To this end para 2.46 of the SoCG between Persimmon, Redrow and TWBC indicates that *'A Framework Masterplan SPD will be progressed for the eastern parcel through joint working with all parties. ....The purpose of this SPD will be set out in guidance to show how the policy requirements together with other policies within the Local Plan should be delivered on the site. At this stage it is anticipated that the SPD will include a comprehensive Masterplan Framework, setting out detail on layout, land uses and housing mix, green and blue infrastructure, movement, development character, placemaking, energy and sustainability. It may include design codes. Integral to the SPD will be how the parcel delivers on garden settlement principles, including a proposed strategy for Stewardship over the lifetime of the development.'*

22.5 Para 2.47 of the SoCG goes on to explain that whilst the Council's adopted Local LDS sets out the timeframes for the preparation of this SPD, it is anticipated that the SPD will be developed alongside the planning application, as the detailed masterplan work

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<sup>6</sup> Similar comments are made in the Strategic Site's Topic Paper at paras 8.18 – 8.20.

progresses. Whilst para 3.15 confirms that the parties agree to work together in the delivery of a Framework Masterplan SPD in line with the policy requirements of STR/SS1.

22.6 Given the scale of development proposed, and the aims and objectives of the NPPF we believe a SPD to be justified in this instance.

**Q23 How will the Council ensure that the allocation comes forward in a coherent and comprehensive manner and avoids the piecemeal development of individual sites?**

23.1 Whilst primarily a matter for the council, we note that Strategic Objectives 1 of the vision of the submission plan is for Paddock Wood, to provide for comprehensive planned strategic growth, that Para 5.18 advises that comprehensive strategic development offers an opportunity to address the towns deficiencies and inject the town centre with new vitality and viability, and that Policy STR/SS 1 indicates that the proposed Framework Masterplans will set out guidance to show how the policy requirements of the Local Plan, will both be delivered on the site and ensure comprehensive development and strong assimilation with the existing settlement at Paddock Wood

23.2 The above is mirrored in the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66) which indicates at para 1.2 that in commissioning DLA to undertake the Strategic Sites Masterplanning and Infrastructure Study, TWBC required 'a *comprehensive approach to development to ensure that appropriate levels of physical and community infrastructure are planned and delivered in a manner which supports the growth of community and mitigates the impact of such large scale growth*', whilst para 5.102 indicates that the recommended Structure Plan and the range of options presented give a comprehensive and co-ordinated approach to development on sites around Paddock Wood.

23.3 Similarly 4.44 of the Strategic Sites Topic Paper (CD 3.67) advises that '*Through the comprehensive masterplanning work undertaken by DLA, there is an appropriate and well considered structure plan for the growth around Paddock Wood and east Capel.*'

23.4 Having regard to the above I have to say that TWBC have always been clear about the need to bring forward the component parts of the proposed strategic allocation of Paddock Wood in a comprehensive and coherent way; and that piecemeal development was never an option. That is understood by all of us involved, and is reflected in the way we have sought to work with the council. It is also clearly set out with in the SoCG between Redrow, Persimmon and TWBC (3.140), which state at Para 3.18 that: '*The parties will continue to work together, including in producing a SPD for this parcel of the strategic site, which will set out the principles for the development and provide a comprehensive masterplan for the allocation site.*'

#### Issue 4 – Paddock Wood Town Centre

No Comment

#### Issue 5 – Land at Mascalls Farm

No Comment