

Paddock Wood Town Council

Matter 8 – Meeting Housing Needs (Policies H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and H12)

ISSUE 1 – Housing Mix

Q1. Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H1?

PWTC Response:

1. No, it is unclear from this policy what TWBC's policy is on housing mix and is also unclear what is required of applicants when submitting a planning application.

Q2. How has the size, type and tenure of housing needed for different groups in the community been assessed and how is it reflected in planning policies, as required by paragraph 62 of the Framework?

PWTC Response:

2. Paragraph 6.310 of the Local Plan explains that proposals should be informed by the following:
 - the Housing Needs Study (2018) or subsequent updates; and
 - parish-wide surveys and policies in 'made' neighbourhood plans; and
 - local planning evidence base documents; and
 - any other relevant and up-to-date information on local housing needs.
3. However, the supporting text does not explain how the policy was arrived at.
4. The policy itself is vague and ineffective as it does not provide enough clarity to the applicant or decision maker.
5. Supporting text at 6.311 explains that on major sites an appropriate mix will usually include a range of sizes and forms however that in some locations where there is a dominance of particular housing types and sizes that the provision of different housing types on the sites will ensure the overall mix for the is more balanced. It is unclear what this supporting text is saying about the mix and

balance for 'major sites' as opposed to non 'major sites'. It seems that the Council is 'hinting' at something rather than being clear about what mix it requires across the Borough and in specific locations / for different site size. Is the Council's position that non 'major sites' should not achieve a balance and mix?

6. We hope TWBC can clarify this and make propose main modifications that result in a policy that is justified, effective and NPPF compliant.

ISSUE 2 – Housing Density

Q1. Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H2?

PWTC Response:

7. No, the policy is ineffective.

Q2. How does the Plan seek to optimise the use of land for development in town centres and other locations that are well served by public transport?

PWTC Response:

8. TWBC has not demonstrated that it seeks to optimise land in town centres and areas well served by public transport as required by the NPPF (Paragraph 125). If the Council had sought to optimise land in these areas then we question whether it would have needed to propose land in areas with high risk of flooding at Paddock Wood.

ISSUE 3 – Affordable Housing

Q1. What is the justification for requiring 40% affordable housing on qualifying greenfield sites and 30% on qualifying brownfield sites in Policy H3? What are the figures based on, how were they calculated and what alternatives were considered?

PWTC Response:

9. It is unclear from the supporting text what the justification is for the proposed policy.

Q2. Paragraph 65 of the Framework states that where major development involving the provision of housing is proposed, planning policies should expect at least 10% of the total number of homes to be available for affordable home ownership. How will this be secured by the Plan?

PWTC Response:

10. The plan does not make provision for this as far as we can tell. This should be addressed by the Council in the Affordable Housing Policy (H3).

Q3. What is the justification for developments of 6-9 units providing a financial contribution towards affordable housing in the High Weald AONB? What is this threshold based on?

PWTC Response:

11. No Comment.

Q4. Where First Homes are concerned, the PPG states that where local plans have reached advanced stages of preparation, they will benefit from transitional arrangements and will not need to reflect the First Homes policy requirement. It also states that in such circumstances, consideration should be given to the need for an early update of the Plan. Is this necessary for soundness?

PWTC Response:

12. Given the lack of local affordability it seems that creating provision for an early update of the Local Plan would be a sound approach particularly given that First Homes are the Government's preferred discount market tenure and should

account for at least 25% of all affordable housing delivered by developers through planning obligations¹.

13. By not including the provision for an early update this could create further affordability issues in the Borough for those seeking to purchase their first homes. This will be out of step with those authorities within TWBC's HMA preparing their Local Plans later than TWBC.

14. The transitional arrangement is triggered by the matter of weeks², so it is on this mere technicality that many future first time buyers could be deprived the opportunity to purchase an affordable home.

Q5. What is the justification for requiring a minimum of 50% of the affordable housing to be delivered on-site prior to completion of 50% of the open market units approved? Is this viable and deliverable?

PWTC Response:

15. The Town Council is concerned that this policy will jeopardise the development and commercial success of the neighbourhood centres that are proposed for the strategic sites and are relied upon by the Council to achieve sustainable communities with access to retail and services without travelling long distances. The Town Council therefore object to this policy.

Q6. What is the justification for requiring all forms of affordable housing to be provided on the basis of a local connection?

PWTC Response:

16. The Town Council supports this policy, as in the major developments in Paddock Wood currently under construction, the social housing element has been sold wholesale to housing associations sponsored by authorities in South London to accommodate their need thus precluding local families from being able to occupy these properties. This is a pattern that is repeated across Kent.

¹ PPG Reference ID: 70-001-20210524

² Reference ID: 70-018-20210524

ISSUE 6 – Housing for Older People and People with Disabilities

Q1. Paragraph 62 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including housing for older people and people with disabilities. What is the need for housing for older people and how will this be met over the plan period? Has the Council considered the need for different types of accommodation, such as sheltered accommodation?

PWTC Response:

17. There does not appear to be a specific provision to cater for this element of the population in the policies for the strategic sites. The Council appears to be relying upon dedicated sheltered housing developments coming forward elsewhere which may result in older or disabled residents being isolated from their local families and friends.

Q2. What is Policy H6(3) based on? Is it justified on all new build developments, and will the requirement be deliverable?

PWTC Response:

18. No Comment.

Q3. What is the justification for requiring all new build development to meet the optional technical M4(2) standard? Is the requirement viable and what contribution will it make to identified needs?

PWTC Response:

19. No Comment.

Q4. What is the justification for requiring 5% of affordable housing on schemes of 20 or more units to meet the optional technical M4(3) standard? Is the requirement viable and what contribution will it have to identified needs?

PWTC Response:

20. No Comment.

Q5. How does the Plan take into account site specific factors such as vulnerability to flooding, site topography and other circumstances (such as step-free access) which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings?

PWTC Response:

21. No Comment.

Q6. Is it necessary to distinguish between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings?

PWTC Response:

22. No Comment.

ISSUE 11 – Accommodation for Gypsies and Travellers

Q1. Is the assessment of future needs in the Gypsy and Traveller (Accommodation Assessment ('GTAA')) accurate robust and up to date?

PWTC Response:

23. The GTAA is dated 2018 however the study and surveys were undertaken in 2017. See Paragraphs S14 and S17 therefore the needs assessment is nearly five years old therefore the data could very well be out of date.
24. The GTAA covers the period 2017-2037 whereas the Local Plan is 2020-2038 which is a clear mismatch. There is no explanation in the Local Plan about the differences in these time periods.
25. We note that the GTAA has a number of 'next steps' for TWBC with one of these being the need for it to review if and how existing local authority sites can be expanded and considering funding options. However, from the Housing Supply and Trajectory Topic Paper (Annex 1) there are only three public sector sites assessed and only one of these (Cinderhill Wood) is assessed as having potential for additional pitches. We question whether TWBC has fully assessed land within public sector ownership for potential Gypsy and Traveller sites.

Q2. What are the accommodation needs over the plan period and how will they be met? How have site capacities been determined, especially for sites with the potential to expand?

PWTC Response:

26. This is for TWBC to answer however the Town Council is concerned that some of the existing sites may be overdeveloped bearing in mind their unsustainable locations. The site proposed for expansion or as new sites in the Paddock Wood area are all well outside the current or proposed limits to built development.

Q3. Is it sufficiently clear to users of the Plan which sites are allocated to meet the needs for gypsies and travellers and travelling showpeople?

PWTC Response:

27. No. Table 11 of the Local Plan is titled "*Existing and proposed new Gypsy and Traveller sites that may have potential for accommodating additional pitches*" which suggests the sites in Table 11 are not allocations but simply sites with potential.
28. Appendix 5 of the Local Plan (Policy H9 Gypsies and Travellers: Site Layout Plans are confusing in their own right and also when viewed next to the Policies Map. The following is unclear from the Maps and the Key:

- Is the redline 'existing Gypsy and Traveller Site Boundary' the boundary from the current local plan or simply the site boundary?
- Is the blueline 'proposed New Gypsy and Traveller Site Boundary' only for 'new allocations' presumably?
- Does "potential area for expansion" mean extension to existing allocation?
- What does "potential area for regularisation" mean?
- What is meant by "potential area for intensification"? Does this mean it is an area of existing pitches where the LPA is now proposing that more pitches are added?

Map Key



Q4. What process and methodology did the Council use to determine which sites to allocate?

PWTC Response:

29. This is for TWBC to answer. It would have been helpful if there were evidence provided anywhere in the submitted documents of discussions or agreement reached with neighbouring authorities to provide cumulatively for such need bearing in mind the location of existing sites in proximity to borough boundaries and generally isolated from the larger settlements, never mind the transitory nature of occupation of some sites by their gypsy and traveller communities.

Q5. Are the allocated sites justified, consistent with national planning policy and capable of being developed over the plan period?

PWTC Response:

30. The Sustainability Appraisal's Assessment of Policy H9 is extremely basic in its scoring and its narrative (see Table 112 (SA Scores for Policy H9-Gypsies and Travellers). It would appear that the SA only assesses Option 1 (Focus on intensification / extension of existing sites) and Option 2: Focus on new allocations. There is no third Option which is a combination of the two options which is we understand it TWBC's selected approach in the Local Plan.

31. It is not immediately clear if the SA assessed the proposed Gypsy and Traveller allocations which would clearly be unacceptable.

32. The Site Layout Plans provided in Appendix 5 of the Local Plan are not adequate to demonstrate that additional pitches can be delivered on the proposed sites.

Q6. Can the Council identify a supply of specific deliverable sites sufficient to provide Five years' worth of sites against the identified requirement?

PWTC Response:

33. This is for TWBC to answer.

Q7. What are the 'highlighted site-specific mitigations' for the purposes of Policy H9?

PWTC Response:

34. It is unclear what is being referred to here and TWBC should justify its policy wording.

Q8. Is it clear to decision-makers, developers and local communities how windfall development proposals will be considered?

PWTC Response:

35. No, the policy refers to 'exceptional circumstances' where 'other proposals for Gypsy and Traveller pitches will be permitted'. What are the exceptional circumstances?