

**To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?**

Appendix D: Proposed changes to policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

**Which part of the plan does your comment relate?**

Policy

**What is the reference number?**

Policy SS/STR1(B) – South Western parcel requirements

**Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:**

Yes No

**Legally Compliant** Selected Not Selected

**Sound** Selected Not Selected

**Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.**

No comments here - please refer to Question 6 below.

**Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Dandara has control of land governed by Policy SS/STR1(B) (South West Paddock Wood) and will be delivering the allocation proposals in accordance with the policy. To ensure that the policy is effective, Dandara would seek the following modifications to the below policy criterion:

Criterion ii) – This criterion seeks to secure sheltered accommodation provision as part of the allocation proposals. Whilst Dandara does not object to the provision of such within the wider proposals, it would seek for this element to be captured within the 40% affordable provision (as governed by Criterion i).

Under criterion i) the affordable housing provision will amount to c. 200 dwellings (40%). This is a significant quantum of the total development and in the present market, demand and need from affordable housing providers has been reduced. This is evident from other schemes Dandara is

presently working on and in this context viable offers from Registered Providers have decreased. From experience, RP's are presently prioritising capital investment in existing stock with less preference being placed on expenditure on new sites.

As such, it is considered that additional affordable or similar housing models (i.e. sheltered accommodation), above 40% provision, could pose potential viability constraints upon the scheme. Accordingly, Dandara would seek for the requirement of criterion ii) to be encompassed within criterion i) i.e. for the sheltered accommodation to be included within the wider affordable housing provision. This would ensure the policy is effective.

Criterion iii) – The criterion seeks 4.54 hectares of land for sport and leisure provision. As derived from the David Lock Associates Land Use Budget Plan (ref. TWBC04-009 C), the sports and leisure provision (parcel – SPP1) extends across both South West Paddock Wood (SS/STR1(B)) and North West Paddock Wood (SS/STR1(A)). The policy as presently worded implies that the entire sports provision is being provided solely in South West Paddock Wood. It is thus requested that the policy is amended to address this.

Criterion xii) – This criterion seeks drainage measures including use of SUDS and connection to wastewater treatment facilities. Dandara supports these requirements.

The criterion goes on to seek the provision of flood attenuation features “to enable the delivery of flood betterment to the north western area of the existing settlement”. Dandara has undertaken initial flood modelling for the site. The early results of this have demonstrated that the scheme will be able to achieve drainage levels at greenfield rates to the required 1 in 100-year flood event (plus allowance for climate change). Work towards seeking betterment will be undertaken at the detailed/planning application stage when issues including levels, requisite groundworks, etc are better known. It is thereby requested that a “so far, as possible and practicable at the planning application stage” caveat clause is introduced to the policy criterion – akin to that in criterion 8 of the main “Development Principles” policy for the Strategy for Paddock Wood (Policy STR/SS1).

Revised Map 28 (Paddock Wood and East Capel Structure Plan) – There is a discrepancy on the number of pedestrian access locations for the south western parcel of the proposed Paddock Wood strategic allocation. Three locations for pedestrian access along the eastern boundary (as shown on the initial masterplans from DLA) were initially considered. However, only the northern and southern connection options, respectively, were found to be deliverable through the connection to an existing PROW (footpath 0197/WT179/1) and using Council-owned land at the end of Fuggles Close. The central option via Mercers Close would require access to be taken through third party land, over which Dandara has no control. Technical work undertaken in December 2021 concluded that the provision of the central access was not necessary to achieve a successful development and would not provide a material benefit to either those traveling from the site to the town centre or for those travelling from externally to the local centre on site. This was accepted by TWBC and the masterplan was to be amended as such. We would be grateful if the plans could be updated to remove the central connection, or clarity provided in the key/annotations that this was a possible option.

**If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?**

Yes, I wish to participate at the examination

**If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:**

Dandara will be delivering the site parcels at Policy SS/STR1(B) and the policy criterion commented upon above will influence how the development is delivered. Dandara will therefore seek to make representations at the Examination hearings. Equally so, the Inspector may seek to ask questions of Dandara on delivery aspects of the scheme and as such it is considered that our participation is important.