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6 June 2022

BY EMAIL ONLY

Dear Nichola Reay,

Re: Paddock Wood Neighbourhood Plan (2022-2038) - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Paddock Wood Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Part I: Strategy

4. Future Growth Strategy

Quality of Life

Public Rights of Way (PRoW): In regard to paragraph 4.23, the County Council welcomes the themes of Health (Recreation), Nature (Green Space and Interaction) and Movement (Walking and Cycling) within the Quality of Life Framework in the Neighbourhood Plan. These themes dovetail with the [KCC Rights of Way Improvement Plan](#) (ROWIP) and KCC would therefore encourage the Town Council to reference the ROWIP when considering countryside access projects surrounding Paddock Wood.

Part II: Policies

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, would recommend that reference is made to the necessity for any development which comes

forward to comply with the safeguarding policies of the [Kent Minerals and Waste Local Plan 2013-30](#). This includes development which may have implications on sites allocated for mineral extraction within the [Kent Mineral Sites Plan](#).

6. Green Infrastructure

Access to the Countryside

PRoW: In reference to paragraph 6.12, KCC is currently working with developers to ensure protection and enhancement of the PRoW within the Church Farm development footprint. Advice has also been provided to The Hop Pickers Line Heritage Group for themed furniture and waymarking.

The County Council is supportive of the Paddock Wood Neighbourhood Plan and welcomes future engagement with the Town Council.

Biodiversity

Biodiversity: The County Council welcomes the consideration of biodiversity as a key theme throughout the Neighbourhood Plan.

Policy PW GI3 – Biodiversity

Biodiversity: KCC supports the inclusion of habitat creation and enhancement within the policy. However, KCC would encourage an update to the policy to include a requirement for ecological enhancement features within new developments, specifically within buildings and the wider site. These features could include integrated bat, bird and insect bricks within the buildings, and features such as log piles, hedgehog highways and species boxes within the site. Whilst this is discussed in paragraph 6.27, the County Council would recommend that this is reflected within the policy.

Flooding and Drainage

Sustainable urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, notes the inclusion of the 'Water People Places' report in paragraph 6.35 of the Neighbourhood Plan. This report is relevant although KCC would emphasise that it can only be used as guidance. It would therefore be advisable to include a statement within the Neighbourhood Plan which refers to the requirement for any design associated with a major development to comply with the guidance and policies of KCC's Drainage and Planning Policy Statement (Appendix A).

The Town Council may also wish to consider referencing paragraphs 159 through 169 of the [National Planning and Policy Framework](#) (NPPF), given that these are specific to planning and flood risk. For example, paragraph 161 states the need to *“(use) opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding”* and paragraph 167 states that *“Major development should incorporate sustainable drainage systems...(and) should where possible, provide multifunctional benefits”*.

KCC would draw attention to [Neighbourhood Planning Support](#) which includes specific advice on the inclusion of the environment and surface water within Neighbourhood Plans such as [“Neighbourhood Planning for the Environment”](#).

Policy PW GI4 – Flooding and Drainage

SuDS: The County Council is supportive of this policy within the Neighbourhood Plan.

9. Access & Movement

Highways and Transportation: The County Council, as Local Highway Authority, is pleased to note that the Neighbourhood Plan reflects the NPPF requirements. KCC also welcomes the innovative examples of access and movement options within the Neighbourhood Plan.

10. Housing & Infrastructure

Social and Community Facilities

Waste Management: The County Council, as Waste Disposal Authority, recognises the need for additional waste infrastructure in the district to meet the demands of housing growth. In particular, the strategic allocations in the Paddock Wood area will place significant pressure on waste services as referenced in the [Infrastructure Delivery Plan](#) (IDP) and in this Neighbourhood Plan. KCC would therefore advise that this need is made clearer in the Neighbourhood Plan, by amending paragraph 10.43 to:

‘The IDP (March 2021), published alongside the submission Local Plan, identifies the need for a range of infrastructure items to support new growth and expansion of the town. This includes provision of new waste infrastructure within the district to ensure a sustainable waste management service is maintained.’

11. Projects

County Council Community and Infrastructure Services: The County Council, as a key infrastructure and service provider, acknowledges that the Town Council is proposing to utilise Section 106 contributions for a number of projects and aspirations within the Neighbourhood Plan. KCC would welcome further consideration relating to the provision of other forms of infrastructure such as education, social care, waste, adult education, libraries and youth services which are also important to support a sustainable community.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Director for Growth and Communities

Encs:

Appendix A: KCC Drainage and Planning Policy Statement