



**Tunbridge Wells  
Borough Local Plan (2020 – 2038)**

**Representation Form**

**Please use a separate sheet for each representation**

Ref:

(For official use only)

<b>Name of the Local Plan to which this representation relates:</b>	<b>Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal</b>
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Completed forms must be received at our offices by **midnight Monday 26 February 2024**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: [LocalPlan@TunbridgeWells.gov.uk](mailto:LocalPlan@TunbridgeWells.gov.uk) or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
<b>Title</b>	<b>Mr</b>	<b>N/A</b>
<b>First Names</b>	<b>James Drummond</b>	
<b>Last Name</b>	<b>WHITEHORN</b>	
<b>Job title (where relevant)</b>	<b>Retired Local Govt. Officer</b>	
<b>Organisation (where relevant)</b>		
<b>Address Line 1</b>	████████████████████	

Address Line 2	██████████	
Address Line 3	██████████	
Address Line 4		
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	████████████████████	

**PART B – YOUR REPRESENTATION**  
(Please use a separate sheet for each representation)

Name or Organisation	Mr James Drummond WHITEHON
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3.	<b>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?</b>	
Chapter and (if applicable) sub heading	Chapter 2.0 Green Belt [pages 6-10 of the Topic Paper]	
Policy		
Paragraph number or appendix	Appendix B Table 3. Housing Needs & Supply 2020-38 Appendix C Table 4 Distribution of Housing Allocations	

4.	<b>Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:</b> (please tick as appropriate)				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>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.</p> <p>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.</p>
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The text box will automatically expand if necessary.

[a] **Housing needs calculations.**

I disagree with the fundamental assumption in Appendix B – Table 3 Housing Needs & Supply that there is a demand for another 12,006 houses in the Borough over the plan period 2020-2038 [667dpa x 18yrs].

But using the NPPF Standard Method for assessing local housing need is not mandatory. The guidance states that another method can be used in exceptional circumstances. As the projections using the Standard Method gives completely unrealistic requirements for T.Wells an alternative method should be used instead.

***Household Projections 2014-based: Methodological Report***

*July 2016 Department for Communities and Local Government*

**5. Uncertainty in the projections** *As with any set of projections, the household projections are subject to error if any of the components – household population, relationship status or household representative rate – are wrong. Projections become increasingly uncertain the further they are carried forward due to the inherent uncertainty of demographic behaviour. This is particularly so for smaller geographical areas and detailed age, sex and type breakdowns.*

The Standard Method to assess housing need uses the 2014-based household projections for England. This is then disaggregated using a highly complex statistical process to derive figures at Local Authority level. The Standard Method data for T.Wells [recorded in Appendix 1 of the Housing Needs Assessment Topic Paper for Pre-Submission LP] shows an increase from 47,277 households in 2011 to 51,926 in 2021 and 56,761 in 2031. Using the figures for 2020-30 gives an increase of 4,843 over the decade [56,293-51,450] which is  $484\text{dpa} \times 1.4 = 678\text{dpa}$ . Using the data from 2021-31 gives a very similar annual increase. It is noted that the target figure has now been reduced slightly by TWBC to 667dpa using the 2014-based projections for 2023-33:  $(57,661-52,897) \times 1.4/10 = 667\text{dpa}$ . [Source: Table 406 Household Projections by District, England 2021-39].

But the 2014-based projections for T.Wells have proved to be far too high as the 2021 Census recorded an actual increase from 49,185 households in 2011 to only 50,244 in 2021 [not 51,926 as quoted from the Standard Method data above] a difference of just 1,059 over the last decade. There is no compelling reason to assume the growth will be much higher than this over the decade from 2023-33.

**This suggests just 148dpa (1059 x 1.4/10) as a far more realistic annual target which would indicate a total of only 2,664 houses is needed over 18years. A reduced target of this magnitude could mainly be met from extant planning permissions and windfall allocations.**

**[b] Dr Bullock's Housing Needs Study 2018.**

According to the Housing Needs Assessment Topic Paper [2019] there were 47,174 households in 2011 [Census figure]. Dr Bullock quite plausibly then assumed a total of 49,442 households and 48,559 dwellings in 2018 [including 731 vacant homes]. According to Dr Bullock in section 7.9 of his report, the T.Wells population was estimated to be 117,700 in 2017 and projected to increase by 9.4% to 128,800 in 2033. He also projected the total number of households will increase by 15.5% from 49,904 in 2017 to 57,661 in 2033. But he had merely quoted the same figures from the now out-of-date ONS subnational population projections in 2014.

By contrast the most recent data from the 2021 Census found that despite overall national growth of 6.3%, the population of T.Wells had only grown from 115,049 to 115,300 over the last decade [2011-21], which was substantially less than 1%.

[Source: [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)]

The 2021 Census also recorded that the number of households in T.Wells had risen from 49,185 in 2011 [48,174 with at least one usual resident] to 50,244 in 2021 [48,200 with at least one usual resident]. This was an increase of only 2% in the decade [or 2.2% with at least one usual resident] compared to 6.1% nationally and it indicates an average of 2.3 people per household. But an extra 12,006 households over 18 years equates to a massive 24% increase over this period [or 13% pro rata for the first decade]. Even allowing for changes in the age structure of the population it is quite unrealistic to expect this type of exponential growth in the number of households in the Borough over the next decade.

**There is clearly something fundamentally wrong with the housing needs calculation when all the recent data indicates a broadly stable population and a growth in the number of households of only 2% over the last decade, but the current target of 667dpa represents a 13% increase over the next decade.**

**[c] Metropolitan Green Belt**

The removal of the plan for a new housing settlement in Capel seems to be the most convenient way to address the Inspector's main concern and move the SLP forward but a significant proportion of the new houses is still proposed to be on existing Green Belt land in Royal Tunbridge Wells; also in Pembury where there is still one of the largest number of houses proposed on existing Green Belt land.



Consequently it will have to be shown in due course that there are exceptional circumstances to justify changing the boundaries of the Green Belt to enable development. Despite the recent thorough review of alternative sites, in view of the evident flaws in the housing needs calculations it will be hard to prove that such exceptional circumstances exist.

**The significant over-estimate of housing needs demonstrated above has resulted in the need to change the existing designation of a number of areas of Green Belt land to allow development to proceed. If however TWBC takes a more realistic view of housing need for the plan period, rather than just relying on the Standard Method, this will enable many of the existing development proposals in the Metropolitan Green Belt to be postponed or deleted.**

[d] **Highway Capacity** - The highway infrastructure especially on the primary routes through Royal Tunbridge Wells is already over capacity for much of the day and especially at the peak hours. If TWBC strives to build an extra 12,006 houses over the LP period [with a typical ratio of 1.4 cars per household in the South East] this will probably add around 17,000 extra cars to the already overloaded network and it will create even worse traffic conditions for existing and new residents alike.

**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.**

**6. 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.**

**The text box will automatically expand if necessary.**

**Conclusion – In my opinion the latest Submission Local Plan is not justified as it is not an appropriate strategy based on proportionate evidence of housing need and it is also not consistent with national policy with respect to the Green Belt.**

**My suggestion is to reduce the Housing Needs data in light of the 2021 census figures and recent trends, then refocus primarily on those sites outside the Metropolitan Green Belt for meeting the future housing needs of the Borough.**

7.	<b>Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.</b>
	Click or tap here to enter text.

8.	<b>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</b>
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**No**, I do not wish to participate at the examination hearings

**Yes**, I wish to participate at the examination hearings

9.	<b>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</b>
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I am challenging the fundamental assumptions about housing needs in the Borough which have driven the call for sites and the excessive number of new houses proposed over the plan period. Depending on how the examination proceeds I would like to reserve the right to appear there in order to explain why I believe the process is flawed.

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings stage once it resumes.

## Sustainability Appraisal

10.	To which part of the Sustainability Appraisal does this representation relate?	
Chapter and (if applicable) sub heading	N/A	
Policy		
Paragraph number or appendix		

11.	<p>Please use this box for any comments you wish to make about the Sustainability Appraisal.</p> <p>The text box will automatically expand if necessary</p>	
<p>Click or tap here to enter text.</p>		

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.**

Signature		Date	20 <sup>th</sup> Feb 2024
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