

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
7-1	L Noakes	Horsmonden Parish Council			13 Updated housing land supply - Table 4 of the SLP		<p>Updated housing land supply - Table 4 of the SLP: Horsmonden Parish Council (HPC) notes the Local Plan Development Strategy Topic Paper - Addendum (PS_054), at para 13.1, refers to housing allocations for Horsmonden and updates to Table 4 which includes lower numbers for the Horsmonden site allocations.</p> <p>Details for each of the 3 proposed site allocations have progressed over time, and these are not reflected correctly in revised Table 4:</p> <p><u>AL/HO1 – Land adjacent to Gibbet Lane</u> - Development of 49 houses on this site is completed</p> <p><u>AL/HO2 – Land South of Brenchley Road</u> - outline planning permission for 68 houses, not 70 has been granted.</p> <p><u>AL/HO3 – Land East of Horsmonden:</u> The following statements are based on an evidence report (TWBC Submission Local Plan Allocation AL_HO3 181223 vPC-F, attached to the representation) adopted by the HPC on 19 December 2023; and the following now needs to be taken into account by TWBC in their housing trajectory plans:</p> <ul style="list-style-type: none"> • AL/HO3 is a combination of 5 different sites (with different site promoters), 4 were offered during the SHELAA process, the other is a southerly plot consented for 20 houses (Bassetts Farm 15/505340/OUT and 19/03657/REM), now under construction (and this site has effectively been withdrawn from the AL/HO3 allocation). • Landscape and Visual Impact evidence used by TWBC in defining the Horsmonden LBD and the development of Policy AL/HO3 is strong for the West Site, but is acknowledged in criterion 8 of the Policy that further consideration is needed for the East Site (also addressed with the SLP Inspector (Matter 7, Issue 13, Question 10). • The adopted Horsmonden Neighbourhood Plan (HNP) specifies the same LBD as the SLP. The fixing of this new LBD in the HNP ahead of the adoption of a new 	<p>Table 4 of the Development Strategy Topic Paper Addendum (document ref: PS_054) reflects the most recent evidence on expected delivery at Horsmonden. The slightly lower figure for Horsmonden relates to the capacity of a site which was agreed by the Council to be somewhat lower than in the SLP, as discussed at the relevant hearing session in 2022, and following the submission and consideration of planning application reference 22/00296/OUT for village hall and a residential development of up to 68 dwellings and associated infrastructure (which members of the Council’s planning committee have resolved to grant, subject to completion of a S106 legal agreement). AL/HO2 is pending decision for 68 dwellings. AL/HO3 is still under consideration. The application under consideration for AL/HO 3 is for 120 dwellings (ref 24/00078/HYBRID) and excludes permission for a further 20 dwellings (ref 19/03657/REM).</p> <p>The total number of dwellings for Horsmonden would still sit within the range set out in Table 4.</p> <p>The Horsmonden sites AL/HO 1, AL/HO 2, and AL/HO 3 were discussed at relevant hearing sessions and site sites outside of the scope of this consultation as none have been referred to in the Inspectors Initial Findings Letter (document ref: ID-012).</p>

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							<p>Local Plan was questioned by and then confirmed/approved by the HNP Examiner.</p> <ul style="list-style-type: none"> • SHELAA sites 108 and 324 (not under the control of the developer) - include some land allocated for residential use (orange) and expansion of the school (pink), as per SLP Map 26. Policy AL/HO3 Criterion 12 requires the school land to be safeguarded for future school expansion, but if the availability of this land cannot be guaranteed, then the infrastructure/implementation of AL/HO3 is compromised. • Policy AL/HO3 Criterion 4 and the HNP require the doctors' surgery to be located on the (orange) land for residential development within the LBD. • Noted TWBC is confident that any impacts on heritage assets including Bassetts Villas, which were addressed at the SLP examination can be adequately dealt with through a planning application. • Policy AL/HO3 allocates a housing target range of 115 to 165 dwellings, stated in the SHELAA report as 140 dwellings (with a +/- 25 range). HPC has reviewed TWBC's SHELAA methodology for this. A density of 30 dwellings per ha (dph) and allows for buffers and land for the doctors' surgery, the East Site has a lower density of 25 dph. However, the AL/HO3 allocation and TWBC consultation Document PS_062 "Updated Local Plan Housing Trajectory – 1 April 2023 Position", need to be revised to take account of the following information: <ul style="list-style-type: none"> ○ Old Station Garage(10 allocated houses +/- 2), is not currently being promoted- allocation of houses on land either side of protected heritage Hop Picker's Lane is highly questionable ○ Concerns about East Site landscape sensitivity now acknowledged by the developer in further Landscape and Visual Impact Assessment (LVIA) work and the area/housing density have been reduced to mitigate these concerns. Housing now reduced from 38 to 22 houses. ○ TWBC recently reconfirmed Non-Designated Heritage Asset status of Bassetts Villas. Allowance needs to be made for their setting/amenity – a reduction of around 5 houses would seem appropriate. 	

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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							<ul style="list-style-type: none"> Given the above housing number reductions (-20 for Bassetts Farm, -10 for Old Station Garage, -16 for East Site LVIA revision and -5 for Bassetts Villas), the overall up to date housing allocation for Horsmonden in SLP Table 4 should be 215 to 259. Document PS_062 Updated Local Plan Housing Trajectory (December 2023) shows developments at AL/HO2 and AL/HO3 taking place between 2026-2028, a change to 2030-2032 in the previous Housing Trajectory (February 2021) (used in EiP discussions). The expectation of timing for the medical hub has now changed and there is a serious misalignment between the SLP and the IDP, not only regarding medical services to cater for growth at Horsmonden, but also other infrastructure - education, water supply, sewer capacity, power supply, and highways issues. 	
17-1		Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	13 Updated housing land supply - Table 4 of the SLP		<p>Updated housing land supply - Table 4 of the SLP -legally compliant/sound:</p> <p>SLP Policy AL/H03 - Bassetts Farm, Horsmonden. Noted Table 4 - Distribution of housing allocations shows revised lower figures for Horsmonden to reflect/exclude consented applications.</p> <p>Noted representations made to public consultation on above site allocation - however, the scope of consultation is focussed on TWBC's response to the Inspector's Initial Findings Letter (which does not pass comment on the proposed strategy/site allocations for Horsmonden).</p>	This is noted.
18-3	Clare Escombe	Hawkhurst Parish Council			11 Housing need and supply		<p>Hawkhurst Parish Council recognise the importance of having a Local Plan in place and support the removal of Tudeley Garden Village, however concerned that this necessitates an early review and would raise the following concerns;</p> <p>Hawkhurst is the only settlement where the housing allocation has increased due to the Plan modifications TWBC has not undertaken an assessment of the housing needs of individual settlements but rather based allocations on the Call for Sites which has resulted in</p>	<p>The Council response to change the development strategy in regard to Tudeley Garden Village (STR/SS 3) and Paddock Wood and land in east Capel (STR/SS 1) will necessitate an immediate review of the plan. This is set out in the Development Strategy Topic Paper Addendum (document ref: PS_054).</p> <p>A hybrid planning application has resolution to grant planning permission for development for up to 70 homes with associated medical centre, parking and landscaping,</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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							<p>significant development in Hawkhurst (and Cranbrook) which is not matched with infrastructure and is not a holistic approach.</p> <p>Need to consider the difference between housing demand and need - both very different.</p> <p>No joined up approach and concern over lack of infrastructure - particularly schools, transport and parking, water and shops.</p> <p>Any future allocations should be based on genuine local need and take into account the views of local residents.</p> <p>HPC is currently updating its NDP and is not allocating sites but recognising that this is the strategic role of TWBC. However would like more consideration of wishes of local residents and recognition of the need for private car use in an area like Hawkhurst when considering parking provision as part of new development.</p>	<p>Full planning application for creation of new country park (document ref: 22/02664/HYBRID).</p> <p>Hawkhurst is identified as a Group A settlement in the Regulation 18 Issues and Options Distribution of Development Topic Paper (document ref: CD 3.16) consultation and as one of those areas where development will be focused.</p> <p>SHELAA site assessment sheet for this revised site is has been undertaken (document ref: PS 038).</p> <p>The Council has reviewed the strategy for Hawkhurst insofar as it relates to infrastructure delivery and feel that the Hybrid application is the only realistic manner in which necessary infrastructure in the form of a medical centre will be delivered for Hawkhurst when it is needed. The removal of the site entirely would result in the delivery of the medical centre for Hawkhurst needing to be allocated as part of a review at a later date.</p> <p>As such the inclusion of the wider site can be accommodated via a proposed modification to the plan and is set out in Appendix F of the Development Strategy Topic Paper Addendum (PS 054).</p>
26-1	SUZANNE CALLANDER				12 Conclusions on preferred development strategy option	<p>Section 12, Table 4 - Distribution of Housing allocation is incorrect. It shows no allocations in Capel. However, the majority of housing in the North Western Parcel A is in the parish of Capel. The figures need to be amended to reflect the fact that there will still be housing allocations in Capel.</p>	<p>The amended plan is not considered to be sound on the following grounds;</p> <p>Section 12, Table 4 Distribution of Housing allocation is incorrect. It shows no allocations in Capel, however the majority of housing in the North Western Parcel A is in the parish of Capel.</p> <p>The figures need to be amended to reflect the fact that there will still be housing allocations in Capel</p>	<p>Modification to Table 4 of the Development Strategy Topic Paper Addendum (PS 054) suggests that there is no development at Capel. The remaining development at Paddock Wood and land east of Capel is identified in Table 4 with revised delivery figures. The table can be further clarified to include reference to Capel as part of the strategic site as part of the Main Modifications such as 'Paddock Wood and land east of Capel'.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
36-1	David Veale				11 Housing need and supply	By ensuring a holistic approach to site allocation of housing that is related to local needs for affordable housing, employment and transport needs. None of these factors seem to be taken into account when allocating potential future sites for housing.	<p>TWBC needs to be transparent about the process it will use to determine future housing need.</p> <p>So far, TWBC has not undertaken an assessment of housing need for individual settlements. Decisions have been driven by the Call for Sites, resulting in significant development in Hawkhurst. The increase in population has not been matched improvements in by infrastructure, educational or employment provision. This will result in an increasingly ageing population.</p> <p>Parking, sewage and freshwater infrastructure already cannot cope and is getting worse.</p>	<p>The Council will be required to follow the guidance in the National Planning Policy Framework, and National Planning Policy Guidance when it determines future housing need.</p> <p>The Council has produced as part of its evidence in support of the Submission Local Plan a Housing Needs Assessment Topic Paper (ref: core document 3.73) This has been an objective assessment, separate from and prior to the consideration of the potential to meet this need through 'sustainable development' in accordance with the NPPF. Additionally the Distribution of Development Topic Paper (ref: core document 3.16) sets out how development objectives will be met across the borough.</p>
42-1	Jo Young	UniFida			16 Updated housing land supply - Table 4 of the SLP		<p>Updated housing land supply - Table 4 of the SLP:</p> <p>Does not take account of recently built 1,000 homes in Paddock Wood</p> <p>Plan seems to protect more affluent communities or those with PR resources</p>	Table 4 of the Development Strategy Topic Paper Addendum (document ref: PS_054) relates to future planned growth only.
62-2		Redrow Homes Ltd and Persimmon Homes South East	Judith Ashton	Judith Ashton Associates	11 Housing need and supply		<p>SLP Mod 3 – housing land supply buffer, of the <i>PS_063 Summary of Proposed Modifications</i>: Unsound with following comments made:</p> <ul style="list-style-type: none"> 10-year housing land supply (HLS) does not accord with the minimum 15-year plan period from adoption set out in para 22 of the NPPF nor the PPG The buffer of 2.8% over the 10-year plan does not tally with the anticipation that outstanding applications (subject to consent) likely surpass the projected trajectory Questionable adoption of Liverpool method for 5-year HLS given the surplus scale (2.8% buffer) and PPG advice Mismatching housing figures in the trajectory in PS_062 and p.57 of PS_054 <p>Hence concern over the local housing requirement that should have been increased.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 69 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>The Council has calculated housing need using the Sedgefield standard methodology. Within each five-year supply position statement, the Sedgefield approach is applied where there has been a shortfall since the base date of the plan period (spread over the five-year period), and the Liverpool approach is applied where there has been a surplus (over the remainder of the plan period). This is explained in the Council's Five-Year Housing Land Supply statements, most recently the one of the 2022-2023 monitoring year [Core Document PS_067] paragraphs 10-14. For clarity, both methods ensure that</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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91-3	Peter Rawlinson	Gleeson Developments Ltd			11 Housing need and supply		Weak justification as to why the Liverpool methodology is adopted for 5-year housing land supply allocation and demand Sedgefield one for consistency with national guidance.	<p>The Council has calculated housing need using the Sedgefield standard methodology. Within each five-year supply position statement, the Sedgefield approach is applied where there has been a shortfall since the base date of the plan period (spread over the five-year period), and the Liverpool approach is applied where there has been a surplus (over the remainder of the plan period). This is explained in the Council's Five-Year Housing Land Supply statements, most recently the one of the 2022-2023 monitoring year [Core Document PS_067] paragraphs 10-14. For clarity, both methods ensure that housing need is met within the plan period. The Sedgefield/shortfall approach encourages a 'bounce-back' in housing supply by increasing the housing target over the five-year period, and the Liverpool/surplus approach reduces a 'break' in housing supply by limiting the reduction in the housing target over the five-year period. Furthermore, examination hearing statement TWLP_011</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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								<p>Matter 2, Issue 1, Housing needs and housing requirement at questions 1 and 2 addresses the Inspector’s questions on housing need under the standard method and whether there are exceptional circumstances to depart from the standard method. The PPG also specifically states, in response to the question of how past shortfalls in housing completions against planning requirements can be addressed:</p> <p>“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”</p>
95-3	Mark Behrendt	Home Builders Federation			13 Updated housing land supply - Table 4 of the SLP		<p>Concerns over the lack of flexibility for delivery:</p> <ul style="list-style-type: none"> • The buffer of 2.8% for 10-year period needs to be more substantial to meet the anticipated needs in full and not on pure windfall amendments given uncertainty in delay • Hence demand more allocated sites in place <p>Object to the use of Liverpool methodology for 5-year housing land supply:</p> <ul style="list-style-type: none"> • Inconsistencies with national guidance • Weak justification for its usage • Sedgefield approach would also suffice the 5-year supply, why Liverpool’s? 	<p>The Council has calculated housing need using the Sedgefield standard methodology. Within each five-year supply position statement, the Sedgefield approach is applied where there has been a shortfall since the base date of the plan period (spread over the five-year period), and the Liverpool approach is applied where there has been a surplus (over the remainder of the plan period). This is explained in the Council’s Five-Year Housing Land Supply statements, most recently the one of the 2022-2023 monitoring year [Core Document PS_067] paragraphs 10-14. For clarity, both methods ensure that housing need is met within the plan period. The Sedgefield/shortfall approach encourages a ‘bounce-back’ in housing supply by increasing the housing target over the five-year period, and the Liverpool/surplus approach reduces a ‘break’ in housing supply by limiting the reduction in the housing target over the five-year period. Furthermore, examination hearing statement TWLP_011 Matter 2, Issue 1, Housing needs and housing requirement at questions 1 and 2 addresses the Inspector’s questions on housing need under the standard method and whether there are exceptional circumstances to depart from the standard method. The PPG also specifically states, in response to the question of how past</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								shortfalls in housing completions against planning requirements can be addressed:
100-1	James Whitehorn				2 Green Belt	<p>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.</p> <p>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.</p>	<p>The proposed amendments to the Local Plan are considered to be unsound in regard to the Metropolitan Green Belt as follows;</p> <ul style="list-style-type: none"> The removal of the plan for a new housing settlement in Capel seems to be the most convenient way to address the inspectors main concerns but a significant number of new homes is still proposed to be on existing Green belt land in Royal Tunbridge Wells and also Pembury. TWBC should take a more realistic view of housing need for the plan period, rather than rely on the standard method which will enable existing development proposals in the MGB to be postponed or deleted. TWBC should reduce the housing needs data in light of the 2021 census figures and recent trends, then focus primarily on those sites outside the MGB for meeting the future housing needs of the borough. 	<p>The proposed modification is not sound in that the standard method requires the 2014-based household projections to be used. Paragraph: 005 Reference ID: 2a-005-20190220</p> <p>The consultation relates to matters raised specifically in the Inspectors Initial Findings, and the associated knock on impacts.</p> <p>The standard method has been used in calculating the Councils projecting housing needs as is required by national policy.</p>
100-3	James Whitehorn				11 Housing need and supply	<p>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.</p> <p>My suggestion is to reduce the Housing</p>	<p>The proposed amendments to the Local Plan are considered to be unsound in regard to Table 3 - Housing Needs and Supply 2020-2038 and Table 4 Distribution of Housing Allocations. The following points are raised;</p> <ul style="list-style-type: none"> Disagree with the fundamental assumption in Appendix B - Table 3 Housing Needs and Supply that there is a demand for another 12,006 houses in the Borough over the plan period 2020-2038. It is considered that using the standard method for assessing local housing need is not mandatory and another method can be used in exceptional circumstances, which would be appropriate in Tunbridge Wells Consider that 148 dpa would be a more realistic target (based on the 2021 Census household 	<p>The proposed modification is not sound in that the standard method requires the 2014-based household projections to be used. Paragraph: 005 Reference ID: 2a-005-20190220</p> <p>Paragraph 145 of the NPPF (05.09.23) states that, once established, Green Belt boundaries should only be altered where 'exceptional circumstances' are fully evidenced and justified, through the preparation or updating of plans.</p> <p>The Council recognises the local, regional, and national importance of the Green Belt and the important role it has, and will play, in shaping the borough. However, as set out in the place shaping policies in Section 5 of the SLP, the</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						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.	<p>growth) as opposed to the 2014-based projections, which would indicate a total of only 2,664 houses is needed over 18 years which could be met from extant planning permissions and windfall allocations.</p> <ul style="list-style-type: none"> Consider that the Local Plan is not justified as it is not an appropriate strategy based on the proportionate evidence of housing need and it is also not consistent with national policy with respect to the Green Belt. 	<p>Council considers that there are the exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation for the proposed development at Paddock Wood (including land at east Capel), at a few sites around Royal Tunbridge Wells (particularly at North Farm/Kingstanding Way), and at Pembury, and also alterations at Southborough, Speldhurst, and Langton Green as set out in the schedule at Table 6 of the SLP which will be subject to Main Modification following on from the removal of Tudeley Garden Village in the Councils response to the Inspectors Initial Findings.</p> <p>The OAN has been reviewed as part of this exercise and is set out in the Development Strategy Topic Paper Addendum (PS_054) Section 11. The OAN as set out in the paper identifies a marginal reduction to 667 dwellings per annum.</p>
126-2	Margaret Borland				11 Housing need and supply		Support the reduction in housing need 2020-2038 set out Table 3.	This is noted.
127-9	Mark Munday				18 Updated housing land supply - Table 4 of the SLP		<p>Social Housing for social rent is disregarded though the plan briefly touches on the elderly/care schemes. Town & Country Housing should reserve sites for those in the register.</p> <p>Brown Field Developments are not fully explored while relying on windfall and potentially green field sites.</p>	<p>Affordable Housing including social housing is a prerequisite of housing delivery and is subject to policy H3 requiring delivery in set circumstances at set levels. The proposed changes in response to the Initial Findings to not seek to alter policy H3.</p> <p>Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83</p>
132-1		Tesco Stores Ltd	Jessica Fergusson	Martin Robeson Planning Practice	13 Updated housing land supply - Table 4 of the SLP	The Council have, within their Development Strategy Topic Paper Addendum (January 2024), confirmed in relation to Policy H6 'Housing for Older People and People with Disabilities', that there is no definitive methodology	<p>The plan is not considered to be sound due to the fact that additional clarification is needed in relation to Policy H6 to respond to the Inspectors letter in regard to;</p> <p>No definitive methodology for assessing the need for older persons housing, but should consider the KCC forecasts and the Strategic Housing for Older People Analysis Tool based on ONS projections.</p>	The Council's approach to housing for Older People and People with Disabilities is set out in the Development Strategy Topic Paper Addendum (PS_054) at Section 13.0 Updated housing land supply, dealt with at para 13.7 – 13.13. It is considered that any modifications required to Policy H6: Housing for Older People and People with disabilities can be dealt with and consulted upon through the 'Main Modifications' process.

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>for assessing the need for older person housing. It is thus identified that on alternative methodology approaches the need comprises either 342 units (utilising Kent County Council's forecasts), 431 units (utilising the Strategic Housing for Older People Analysis Tool based on ONS population projections) or 776 units (based upon a market view of a rate of 45 per 1,000 people aged 75+).</p> <p>The Inspector, at paragraph 92 of his Initial Findings, confirms that the Plan needs to be modified to clearly set out the gross need for extra care housing based on the first two methodology approaches listed above i.e. a range between 342 and 431 units. It is therefore necessary for Policy H6 to be amended to include reference to these identified needs.</p> <p>At paragraph 92 the Inspector also identifies that the Plan should make it clear as to how these needs will be met by listing the relevant sites that will meet this identified need. The Council at paragraph</p>	<p>The Plan should set out the gross need for extra care housing based on the above assessment methods to clearly set out the need and Policy H6 be amended in this regard.</p> <p>The Plan needs to be clear on how these needs should be met by listing the sites that will be allocated to meet this need.</p> <p>The list of sites to meet this need currently set out excludes the sites that had been previously listed for Tudeley Garden Village, but with its removal it is not clear how this need will be met.</p> <p>Reiterate the suitability of the site at Woodsgate Corner to be allocated for extra care accommodation for 80-120 units which can be readily accommodated on the site with no significant constraints to development.</p> <p>Suggested amendments to Policy H6 in order to make the plan sound to include quantified need and list of sites to deliver the need.</p>	<p>The suitability of the Woodsgate Corner site is noted.</p>

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						<p>13.11 of the Topic Paper Addendum provide a list of sites with outstanding planning permissions along with specific site allocation policies for extra care housing. This list however excludes the provision of extra care previously associated with Tudeley Village following the decision to remove Tudeley Village from the Plan. In response to the Inspector's Initial Findings it will also therefore be necessary to include within Policy H6 this list of sites to indicate how the identified need will be met.</p> <p>Bearing in mind the Council have determined to remove Tudeley Village from the Plan it is even more imperative that sites are allocated for extra care housing. The deletion of Tudeley Village removes the provision for at least one sheltered and one extra care scheme that formed part of the policy requirement.</p> <p>With the above in mind, we write to reiterate the suitability of our client's site at Woodsgate Corner to be allocated for extra</p>		

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						<p>care accommodation. The proposed allocation's scale of development (80 units of extra care or up to 120 units of residential care home) can readily be accommodated within the available site. There are no constraints of significance. The site is generally level and has a good access arrangement and it is thus suitable to deliver such extra care provision.</p> <p>In light of the Council's decision to remove Tudeley Village from the Plan all sites to be allocated are essential in terms of ensuring that the Council can meet the identified need. The Woodsgate Corner allocation will therefore provide valuable unit numbers contributing towards the Council meeting the identified need.</p> <p>Additional text is therefore needed in relation to Policy H6 in order to make the plan sound i.e. that it is positively prepared (seeking to meet the area's objectively assessed needs) and effective (deliverable over the plan period) as follows:</p>		

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>The following sites will provide housing for older persons to meet the requirement for extra care housing within the ranges set out below.</p> <p>[TWBC: to view the tables, please see the original submitted response form]</p> <p>To summarise therefore, it has been demonstrated that given the removal of Tudeley Village it is necessary to ensure all sites proposed to be allocated are allocated within the Plan in order that the identified need for housing for older people can be met. To address the comments made by the Inspector in his Initial Findings it is necessary for this need to be quantified within Policy H6 and also that a list of those permissions and allocations, including the Woodsgate Corner allocation, is included within the Policy to demonstrate how this need will be met.</p>		
140-1		Cooper Estates Strategic Land	Katherine Miles	Pro Vision	13 Updated housing land supply - Table 4 of the SLP	<p>Please see our statement accompanying these representations but in summary:</p> <p><i>[TWBC: Full response in accompanying statement]</i></p>	<p>The amended plan is considered to be neither legally compliant or sound for the following reasons;</p> <p>The Plan is not consistent with national policy - para 22 of the NPPF.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 69 of the NPPF sets out that for when identifying land for homes planning policies should</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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						<p><i>available to view under 'Please use this box for any other comments you wish to make' question box]</i></p> <p>The SLP as proposed to be modified continues to deliver insufficient housing for older persons over the plan period, and this is a failure of the plan in terms of the social facet of sustainable development. The plan is therefore unsound.</p> <p>To address our concerns, Woodsgate Corner should be allocated as a Care Home and not a dual allocation. The Council needs to review its Care Home needs as well as its Extra Care home needs and ensure sufficient allocations are made for both.</p> <p>The Council should allocate at least one additional site to meet the extra care needs identified, and in that regard, we consider our client's site at Sandown Park to be suitable.</p>		<p>identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period. It is considered that the amended proposals do comply with national policy.</p> <p>The Council's approach to housing for Older People and People with Disabilities is set out in the Development Strategy Topic Paper Addendum (PS_054) at Section 13.0 Updated housing land supply, dealt with at para 13.7 – 13.13. This approach is considered appropriate. Any modifications required to Policy H6: Housing for Older People and People with disabilities can be dealt with and consulted upon through the 'Main Modifications' process.</p> <p>The suggested modification to the Woodsgate Corner allocation (AL/PE 6) is considered unnecessary, with the policy for dual use providing greater flexibility, both uses contributing towards the overall Older People and People with Disabilities need.</p> <p>It is noted that the Sandown Park site has been promoted through a planning application (reference 20/01506/OUT) which sought consent Outline consent (Access not reserved) for the development of a care community within Use Class C2 of up to 108 units of accommodation for older persons in need of personal and nursing care; associated communal facilities and services to meet residents' day to day needs and associated facilities for staff; car parking for residents, visitors and staff of the community; associated landscaping and outdoor amenity areas; and associated infrastructure. This was refused by the Council on 17 June 2021 and subsequently dismissed at appeal (appeal reference APP/M2270/W/21/3289034) by decision dated 2 September 2022, which amongst other matters included need and supply.</p>
152-3	Save Capel				11 Housing need and supply		Save Capel consider that the proposed changes to the Local Plan are not sound in regard to Housing need and supply and raise the following points;	The standard method has been used in calculating the Councils projecting housing needs as is required by national policy.

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							<ul style="list-style-type: none"> Note that the housing need has reduced from 678 dpa to 667 dpa based on household projections, and that 12,006 dwelling are required up to 2038. Save Capel consider that exceptional circumstances existing which would have enabled TWBC to pursue an alternative strategy and more realistic housing requirements. Question whether TWBC need to meet the standard method housing calculation requirements in full and that TWBC has discretion to not meet its need taking into account the need to release GB land. SC consider that TWBC have justification for a lower housing requirement and no need to release GB land at East Capel. Save Capel strongly support the removal of TGV from the Local Plan. It is not clear why TWBC did not consider the inclusion of the possible alternative approach of 'broad locations' set out in the NPPF, para 68. Save Capel acknowledges that windfall allowances have been increased slightly from the SLP starting 2026/27 but their contribution to meet the 10 year need is uncertain. The housing trajectory is very front loaded and it is not confident that the 2,845 units from extant permissions will be delivered. Only 30 other allocations on top of the strategic sites and this raises questions as to whether all other sites have been adequately considered, including omission sites. Delivery of housing commencing in PW in 2025/26 seems optimistic. Save Capel is concerned that Capel's rural identity is being overlooked and in Table 4, Capel has been struck out which is misleading as approximately 1,250 houses are allocated on land in Capel Parish. No benefits in the Local Plan identified for Five Oak Green. <ul style="list-style-type: none"> Reference to DLA work referring to 'Chapel Grange' rather than its correct name of Capel Grange which has not been corrected. 	<p>The OAN has been reviewed as part of this exercise and is set out in the Development Strategy Topic Paper Addendum (PS_054) Section 11. The OAN as set out in the paper identifies a marginal reduction to 667 dwellings per annum.</p> <p>Annex 1 of the NPPF (19.12.23) states that for the purpose of plan making 'The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements' (para 230).</p> <p>The inclusion of broad Locations as part of the review would have required a further Call for Sites exercise to be undertaken.</p> <p>The councils trajectory has been reviewed and delivers housing across a ten year period at a fairly standard figure between until 2034/2035. It is not considered therefore that the plan is frontloaded.</p> <p>Omission sites have been considered as part of the early plan making stage (SHELAA CD 3.77 a - s) and as part of the subsequent hearings in 2022. Furthermore reasonable alternative sites have been given a Stage 3 green Belt assessment review as part of the councils response to the Inspectors Initial findings which have identified no other sites of significance that would obviate the need for strategic development at Paddock Wood and land at east Capel.</p> <p>Modification to Table 4 of the Development Strategy Topic Paper Addendum (PS_054) suggests that there is no development at Capel. The remaining development at</p>

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							<ul style="list-style-type: none"> 28% of overall housing allocations are within Capel yet it is not listed in the key tables, but rather as expansion of PW. Revised strategy for Capel Parish has not been included in the consultation, but will be at a later stage which is not considered to be appropriate. 	<p>Paddock Wood and land east of Capel is identified in Table 4 with revised delivery figures. The table can be further clarified to include reference to Capel as part of the strategic site as part of the Main Modifications such as 'Paddock Wood and land east of Capel'.</p> <p>Five Oak green sits within a gap between previous strategic Site Allocation STR/SS 3 Tudeley Village and Paddock Wood and land in east Capel STR/SS 1. The proposed strategic site STR/SS 1 will deliver enhancements to the road network, sustainable transport measures and sports provision.</p>
162-2	Nichola Watters	Wealden District Council			11 Housing need and supply		<p>Housing need and supply legally compliant/sound:</p> <p>Noted that under the revised strategy, TWBC continues to meet its own housing needs (though through a 10 rather than 15 year housing supply) and agrees with the pragmatic approach of policy provision for an early review and further investigation of meeting need post 2034.</p>	This is noted.
167-3		Bellway Homes Strategic	David Murray-Cox	Turley	11 Housing need and supply		<p>In regard to SLP Modification 3, It is clear from the current consultation that the Plan cannot provide for the full 15 year plan period. It is recognised that it is not an absolute requirement to identify specific sites or broad locations for years 11-15 as the NPPF states that it should be done where possible.</p> <p>It is the view of Bellway Strategic Homes, that it has not been established that this would not be possible but rather the Council pursued an approach which it has subsequently decided to abandon. This is considered to be a flawed approach.</p> <p>Bellway welcome a number of the changes made to the Local Plan, however remain concerned about the reduction of housing supply for year 1-10 and that it does not make sufficient provision for housing land supply.</p> <p>Additionally, they raise concerns about Policy AL/RTW19 which forms part of the wider area under option to Bellway, yet it is allocated for sport and recreation use despite having no interest in the land.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period. It is considered that the amended proposals do comply with national policy.</p> <p>The Council has sought to review the matters raised in the Inspectors Initial Findings and considered development strategy options in the DSTPA (PS_054).</p> <p>Housing supply for the 1-10 year period is adequate to meet the identified need for these years as set out in the revised trajectory.</p> <p>Policy AL/RTW19 is an important part of the councils sports strategy which is set out in the Sports and Active Recreation Strategy (CD 3.121) Site Options Analysis for</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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								the site (CD_3.169) to deliver necessary provision in Royal Tunbridge Wells.
169-5	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	13 Updated housing land supply - Table 4 of the SLP		<p>Housing Trajectory and Housing Delivery Assumptions - Legally non-compliant/unsound:</p> <p>TWBC's evidence and approach to determining the housing trajectory (as at 1 April 2023, published December 2023) and delivery assumptions are not justified, not effective and inconsistent with national policy, particularly para 73.</p> <p>STR / SS1 (The Strategy for Paddock Wood and east Capel)</p> <p>TWBC uses the Mid assumptions of 3,540 in the 2021 trajectory and 2,453 in the 2023 trajectory. This results in a reduction of 1,087 dwellings for STR/SS1, which undermines the Council's overall revised strategy</p> <p>Both trajectories show first housing completions in 2025/26 and full completions in 2036/37 - total of 12 years of delivery. 2025/26 is unrealistic and not backed by evidence.</p> <p>Lead in time for housing delivery - for Tudeley Village, the Inspector references 'Start to Finish: Second Edition'(Lichfields 2020) (also used by PWTC). The same should apply to Paddock Wood as a large site of over 2,000 dwellings (the threshold used in that study). Using this lead in time from validation of an application in 2024/25, commencement would be between 2029/30 and 2032/33. This would result in a reduction of between 830 and 2,011 dwellings for STR/SS1. Would also need to be many reserved matters applications, Section 106 agreement(s), discharging of planning conditions etc. and the Colt's Hill Bypass and other infrastructure would need to be finalised prior to development.</p> <p>The bulk of the delivery is assumed between years 2026/27 and 2033/34 with an average delivery rate of 254 dwellings pa (2023 trajectory) compared with 300 pa (2021 trajectory). Also at odds with Lichfield evidence with an average build-out rate of 160 dwellings pa (therefore delivery over 15 years for this allocation) . TWBC's delivery rate is nearly twice this amount. Given this and</p>	<p>The trajectory as set out is reflective of discussions with developers who in this case are best placed to assess likely rates and starts on site, particularly as they are national house builders. Furthermore the sites at east Paddock Wood are well advanced with three Hybrid planning applications currently being considered by TWBC (23/00086/HYBRID, 23/00091/FULL, 23/00118/HYBRID) totalling 1,160 dwellings. Reserved matters applications would be required for subsequent phases however the first phases of 330 dwelling are submitted with full details.</p> <p>Delivery rates agreed with developers and are included in the Updated Local Plan Housing Trajectory (PS_062).</p> <p>Policy STR / PW 1 is outside of the scope of the consultation and is not proposed for changes. The policy seeks to deliver 30 dwellings within Paddock Wood town centre as part of the appropriate mix of uses within the town centre to ensure a vibrant and viable centre.</p> <p>There are a series of Housing policies in the SLP which control the delivery of appropriate types of housing. Policy H3 (Affordable Housing) states all forms of affordable housing will be provided on the basis of a 'local connection cascade'. The details of this cascade will be determined on a case-by-case basis, but will follow the general approach of prioritising households with an established local connection (and for social and affordable rent) in housing need to the parish or town through residence or place of work, then households from surrounding parishes in the borough, and then wider. This reflects the Council's housing allocations policy.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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							<p>the lead in times needed, total delivery would extend well beyond Local Plan period with significant impacts on TWBC's 10 year housing supply.</p> <p>STR / SS2 (Paddock Wood Town Centre) -No explanation why 16 dwellings in the town centre are assumed over the Plan period</p> <p>AL / PW1 (Land at Mascalls Farm) - 413 dwellings assumed in 2023 trajectory, however no phasing/explanation is provided.</p> <p>Extant Planning Permissions - 2023 trajectory assumes delivery of 2,845 dwellings. However, there is no breakdown of numbers. Should be included in trajectory given their importance in the next 3 years.</p> <p>Overall Trajectory Delivery Rates vs Past Delivery</p> <p>The delivery assumptions for housing are well in excess of the average annual housing completions in the past 16 years as evidenced by TWBC's Monitoring Report (2022):</p> <p>2020/21 Assumed:767dwellings, Actual:688dwellings (-79dwellings)</p> <p>2021/22 Assumed:932dwellings, Actual:518dwellings (-414dwellings)</p> <p>2022/23 Assumed:990dwellings, Actual:636dwellings (-354dwellings)</p> <p>If TWBC has misjudged delivery by -847 dwellings (over previous 2 years), how reliable is the trajectory for the coming years?</p> <p>Affordable Housing</p> <p>No details of the local cascade connection are provided under Policy H3: Affordable Housing (to be determined on a case by case basis). Therefore not specific enough for effective implementation. e.g. understood that affordable housing is being allocated to residents of London Boroughs. Local connection requirements need to be discussed with PWTC to ensure affordable housing provision applies to needs of Paddock Wood.</p>	
169-6	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design	11 Housing need and supply		Housing Trajectory and Housing Delivery Assumptions - Legally non-compliant/unsound:	The proposed amendments to the SLP in response to the Inspectors Initial Findings is considered to be justified effective, consistent with national policy and positively prepared in accordance with NPPF para 35. The spatial

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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							<p>Poorly thought-out assumptions regarding housing delivery/trajectory - therefore Plan is unsound, not justified/effective/consistent with national policy, contrary to NPPF para 35. Further evidence gathering and analysis needed to determine most appropriate spatial strategy.</p> <p>Windfall Allowance</p> <p>Proposed increased windfall allowance in the Housing Trajectory of an additional 520 dwellings (assumed in the supply up to 2038) is used instead of looking for alternative development sites in the rest of the borough outside of Paddock Wood. Windfall also needs to be predicted using longer term trends (4 years is too short).</p> <p>Gypsies and Travellers</p> <p>Approach to identifying locations for Gypsy/Traveller accommodation is unclear and unjustified (includes Policy H9 (Gypsies and Travellers) and Policy STR/SS1)</p> <p>Submission Local Plan Policies Map identifies 3 existing Gypsy and Traveller sites on the east side of Paddock Wood (PW) for intensification/regularisation to meet additional needs. However, the 2023 'Structure Plan' identifies an area south of the railway line in the west of PW for 'Gypsy & Traveller provision' and the 'PW Strategic Sites Masterplanning Addendum' states that the location is indicative and should remain flexible. There is no explanation for this change.</p> <p>Gypsy and Traveller Accommodation Assessment was published in January 2018 and is clearly out of date. Only covers period to 2037 (not aligning with the proposed 2038 Plan period)</p>	<p>strategy seeks to deliver a ten year supply of housing. The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>The data in the DSTPA (PS_054) provides a total of 4 years' completion figures for windfall sites beyond that (up to 2018/19) that was available to inform the SLP. Therefore, it is considered appropriate to review the estimates. Whilst the data reviews large windfall sites over a 4 year period, small windfall data has been reviewed over the past 17 years. The revised windfall target of 150 dpa is made up mostly of the smaller windfall sites of 120 dpa.</p> <p>In response to the Inspectors letter dated 07.02.24 and in response to the Government's revision to the Planning Policy for Traveller Site, the councils GTAA is being revised and data should be available in later in 2024. In regard to Gypsy & Traveller provision as part of STR/SS 1 the site is a re-provision of the original site in the policy on the south side of the railway as part of the overall Master Plan revision to the policy.</p>
170-2		Rydon Homes	David Neame	Neame Sutton	11 Housing need and supply	<p>In summary the following areas of change are required for the Plan to be both legally compliant and sound:</p> <p>[TWBC: these proposed changes relate to multiple comments added under</p>	<p>Housing need and Supply - legally non-compliant/unsound:</p> <p>A Housing Technical Paper February 2024 (Neame Sutton Ltd) is attached as Appendix 1 and forms the basis of this representation (having regard to NPPF 2021, corresponding National Planning Practice Guidance and the new NPPF (December 2023) where relevant to the examination of the Plan. Also based on evidence in TWBC's Topic Paper (January 2024) (PS_054) and 5</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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						<p>different consultation points]</p> <ol style="list-style-type: none"> 1. The Council needs to ensure that the Plan meets the full objectively assessed needs for the full plan period i.e up to 2038 at least; 2. Further allocations are needed to ensure Point 1 above is met; 3. Further allocations are needed in any event to enable the Council to demonstrate a 5-year housing land supply at the point of adoption and then to maintain a rolling 5-year housing land supply thereafter; 4. The Green Belt Stage 3 study needs revisiting again to address the deficiencies identified in Section 4 of these Representations and also within the Technical Note prepared by Liz Lake Associates; 5. Neither The Five Oak Green Bypass nor The Colts Hill Bypass are currently sound. Should the Council continue to wish to include these two components of transport infrastructure the deficiencies identified in Section 4 of these Representations and the Technical Note prepared 	<p>year Housing Land Supply Position Statement (5YHLSPS) (October 2023)</p> <p>Revised Local Plan Policy STR1 sets out the minimum housing requirement of 12,006 dwellings (667 dpa) using the Standard Method calculation of Local Housing Need (April 2023 to 2038)</p> <p>The supply sources the Council relies upon in the trajectory for the Plan are: Completions 2020 – 2023; Extant Planning Consents as at 01 April 2023; Windfall allowance small sites; Windfall allowance large urban sites; Outstanding Site Allocations (from extant Local Plan); Outstanding Benenden Neighbourhood Development Plan Site Allocations; New Housing Allocations proposed in the Plan</p> <p>In considering these supply sources, important to have regard to national policy requirements - NPPF Annex 2 definitions of deliverability and developability (as supplemented by the PPG); and requirement to provide 'clear evidence' of deliverability for proposed housing allocation sites for first 5 years of Plan period</p> <p>Comments on supply sources identified in TWBC's housing delivery trajectory:</p> <p><u>Extant Planning Consents as at 01 April 2023 (Commitments):</u></p> <ul style="list-style-type: none"> • TWBC seeks to rely on 2,845 dwellings from extant consents (majority programmed for delivery within current 5 years commencing 2023/24) • At the Regulation 18 consultation stage TWBC considered it appropriate to apply a 10% lapse rate to its small-sites commitment (1-9 dwellings), but no such allowance has been made in the most recent supply assessment, with no reason for its removal. The 10% lapse rate should be re-instated given inherent uncertainty of delivery of small scale consents across the borough • Noted TWBC has given consideration to its large site commitments in response to need for 'clear evidence' that such sites are deliverable within current 5-year period as required by Annex 2 of the Framework 2021 	<p>A 5-year housing land supply on adoption (assumed to be end of 2024, so taking the figure for the coming five years from 1 April 2025) of 6.13 years (under the Liverpool method, which spreads the surplus over the whole plan period, rather than just the next 5 years).</p> <p>TWBC have commissioned LUC to undertake a Green Belt Study Stage 3 Addendum report (PS_035). This work, in a transparent and consistent way applying the same methodology as it did to the original Stage 3 work so that comparisons can be made (in Green Belt terms) between the proposed allocations and all reasonable alternatives. The Green Belt review methodology was discussed as part of Matter 4 Issue 2, Hearing Day 6 30.03.22, and has not been specifically raised in the Inspectors Initial Findings Letter.</p> <p>Five Oak green bypass removed from the plan. Colts hill remains in still required and funded by PWeC development</p> <p>It is proposed that to meet additional housing need identified for years 10-15 in the plan period that the Council will undertake an early review of the local plan. The Council has identified that a policy will be required to be included, or modified to properly demonstrate this. It would be at this point that a call for sites would be undertaken to assess potential new sites such as those identified in the representation at Five Oak Green.</p> <p>The data in the DSTPA (PS_054) provides a total of 4 years' completion figures for windfall sites beyond that (up to 2018/19) that was available to inform the SLP. Therefore, it is considered appropriate to review the same estimates. Whilst the data reviews large windfall sites over a 4 year period, small windfall data has been reviewed over the past 17 years. The revised windfall target of 150 dpa is made up mostly of the smaller windfall sites of 120 dpa. A 'lapse rate' has been applied to the small site windfall allowance. The windfall rates are considered to be realistic for the plan period.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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						<p>by Velocity Transport Planning need to be addressed; and,</p> <p>6. Based on these Representations Rydon Homes' promotion site at Five Oak Green represents an ideal opportunity for allocation in the Plan that will deliver sustainable growth and tangible planning benefits to the wider community in line with the Council's strategic policy objectives.</p>	<ul style="list-style-type: none"> Evidence set out in TWBC's Five-Year Housing Land Supply 2023/2024 Statement (October 2023) is limited and the updated housing trajectory is based on this. <p><u>Outstanding Allocations and New Allocations:</u></p> <ul style="list-style-type: none"> TWBC relying on 5,4957 dwellings coming forward across Plan period from a combination of outstanding unimplemented allocations in the extant Local Plan and new allocations in the emerging Plan (45.8% of the total supply). Analysis of proposed allocation sites in context of NPPF 2021 (Annex 2) and PPG requirements: <ul style="list-style-type: none"> TWBC is still reliant on delivery from strategic scale allocation at Paddock Wood (2,453 dwellings). Projected delivery rates are set out in TWBC's Strategic Sites Topic Paper (March 2021), but TWBC accepts it has no experience of delivering development of this scale. Cautious approach should be taken but trajectory in the Topic Paper (PS_054) expects this site to deliver 835 dwellings in current 5 year period - unrealistic TWBC relying on delivery from proposed allocations within current 5-year period without presenting any evidence that these sites are capable of delivering completions. TWBC's Five Year Housing Land Supply 2023/2024 Position Statement only considers delivery from allocations carried forward from existing/adopted Local Plan. This does not amount to 'clear evidence' of delivery. For remaining sites TWBC is expecting completions in first 5 years, but no evidence. Suggested all supply relied upon from proposed allocations within first 5-years of Plan Period be removed (Appendix 1 of Housing Technical Paper submitted with representation) <p>(iii) <u>Strategic Allocation – Paddock Wood:</u></p>	<p>Realism of delivery rate is supported by national housebuilder developers who have experience of delivery at strategic sites such as those at STR/SS 1 and which is set out in the Updated Local Plan Housing Trajectory (PS_062).</p> <p>The trajectory as set out is reflective of discussions with developers who in this case are best placed to assess likely rates and starts on site, particularly as they are national house builders. Furthermore the sites at east Paddock Wood are well advanced with three Hybrid planning applications currently being considered by TWBC (23/00086/HYBRID, 23/00091/FULL, 23/00118/HYBRID) totalling 1,160 dwellings. Reserved matters applications would be required for subsequent phases however the first phases of 330 dwellings are submitted with full details.</p> <p>The Council has revised its 5YHLS position statement in line with the revised NPPF and NPPG updates and can demonstrate a 4.5 year HLS position. It is not uncommon for the bulk of housing delivery to be from strategic sites.</p>

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							<ul style="list-style-type: none"> • TWBC's housing delivery trajectory is heavily dependent on PW Strategic Allocation (2,453 dwellings - 45.1% of proposed Plan allocations) and shows its expected delivery in the monitoring year 2025/26, first year following projected adoption of Plan. This rapidly increases to an annual projection of 295 dpa - unrealistic. The consultation does not include any update to support the new delivery trajectory for the site. • TWBC appears to be relying on evidence from Letwin Review 2018 for evidence of build out rates on sites of 2,000+ dwellings (Table 8, page 25 of 5YHLSPS) and build out evidence from site promoters is 'to be confirmed'. Application of a delivery rate of 299 dpa taken solely from Letwin is not robust, (more up-to-date Lichfield evidence February 2020, not used). TWBC should therefore adopt a trajectory reflective of wider data set provided in most recent Lichfield 2020 evidence (see Appendix 2 of Housing Technical Note). <p>(iv) <u>Windfalls</u></p> <p>TWBC places heavy reliance on windfalls to help meet housing need for Plan period (total of 1,824 dwellings relied upon - 152 dpa from 2026/27 until the end of the Plan period)</p> <p>Important to note the following points:</p> <ul style="list-style-type: none"> • TWBC's evidence in Topic Paper is based primarily on historic data - given Green Belt constraints and absence of an up-to-date Local Plan, this trend data is likely to contain higher windfall rates than will prevail in future • TWBC seeks to rely on 456 dwellings from windfalls in current 5-year period, but no evidence to demonstrate this is a reliable source for delivery (as required by Para 71 of NPPF (2021)). Also a notable increase from the position advanced by TWBC at the start of Examination (relying on 244 dwellings in current 5-year period). This component of supply should be removed. • Given TWBC had previously conceded the windfall allowance would reduce to 102 dpa, this should be 	

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							<p>the maximum level relied upon in the trajectory (could go even lower given stance taken by TWBC at Regulation 18 stage - 50 dpa)</p> <ul style="list-style-type: none"> Since the examination, there have been changes placing more emphasis on the need to demonstrate evidence of forward trend analysis. These new matters (not considered by TWBC) include: new Levelling Up and Regeneration Act enacted on 26 October 2023; general election due between May – Autumn 2024; speculative applications by small/medium sized developers in a time of uncertainty may be too high risk; highest interest rates in 15 years; high inflation rates (10.7% in November 2022 and 4.6% in October 2023); Bank of England base rate is at 5.25% compared with 0.1% in 2021; Homes England (June 2023) confirms starts are down by 5.6% <p><u>5-Year Housing Land Supply</u></p> <p>TWBC's updated Housing Trajectory does not provide a rolling 5-year supply calculation, so not possible to ascertain whether Plan will deliver/maintain a 5 year supply as required by NPPF (2021):</p> <ul style="list-style-type: none"> <u>Static 5-Year Housing Land Supply as at 01 April 2023</u> - only 5 year supply calculation provided by TWBC is set out in Five Year Housing Supply 2023/24 Position Statement (5YHLSPS), confirming TWBC's position is 4.29 years. Therefore cannot demonstrate a 5 year housing land supply, a significant concern to be resolved if the Plan is to be found sound. <u>Rolling 5-Year Housing Land Supply across the Plan period:</u> Table 1 in Appendix 1 - Housing Technical Note (attached to the representation) provides a rolling 5-year supply calculation based on TWBC data and confirms a healthy position, not reflected in TWBC's 5YHLSPS 2023/24. This is because TWBC's housing trajectory for the Plan period includes allocations within the first 5-year period that do not meet the NPPF Annex 2 test of deliverability. Table 2 in Appendix 1 - Housing Technical Note (attached to the representation) sets out the rolling 	

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							<p>5 year housing supply position with supply sources amended and confirms that at no point during the remainder of the Plan period will the Plan deliver a positive 5 year supply position. This position will persist even if all of the adjustments were not applied as set out in Section 2 of this Note.</p> <ul style="list-style-type: none"> The proposed revisions to the Plan therefore fail the key soundness test of planning positively to help boost the supply of housing. <p>Conclusions on Soundness of Plan</p> <ul style="list-style-type: none"> On basis of assessment undertaken Housing Technical Note (submitted with representation) apparent the proposed housing trajectory for the revised development strategy will not deliver a rolling 5 year supply of deliverable housing sites – Plan is therefore unsound Too much reliance on remaining strategic allocation (45% of proposed allocations), which will take a considerable period of time to deliver, and evidence base on its delivery is insufficient/uncertain. Other sites are relied upon within the first 5-years of the Plan period without any ‘clear evidence’ of delivery TWBC plans for insufficient housing to deliver a 15 year strategy. Evidence demonstrates Plan fails to meet reduced objective of a 10 year strategy. <p><u>Suggested changes:</u></p> <ul style="list-style-type: none"> TWBC needs to ensure Plan meets full objectively assessed needs for full plan period i.e up to 2038 at least; Further allocations are needed to enable TWBC to demonstrate a 5-year housing land supply at point of adoption and a rolling 5 year housing land supply thereafter; Green Belt Stage 3 Study needs revisiting to address deficiencies identified in Section 4 of representation and also within the Technical Note prepared by Liz Lake Associates; 	

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

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							<ul style="list-style-type: none"> Neither the Five Oak Green Bypass nor The Colts Hill Bypass are currently sound. Infrastructure issues raised in Section 4 of representation and Technical Note prepared by Velocity Transport Planning need to be addressed; and, Omission site Site 330 – Finches Farm, Five Oak Green represents an ideal opportunity for allocation in the Plan. 	
172-2		Rydon Homes	David Neame	Neame Sutton	11 Housing need and supply	<p>In summary the following areas of change are required for the Plan to be both legally compliant and sound:</p> <p>As per 170-2</p> <p>4. The Council should explore all other reasonable alternatives including in locations such as Cranbrook and Sissinghurst to help meet the shortfall in housing. As Rydon Homes has previously identified these locations can also make a valuable contribution towards meeting the minimum LHN over the whole Plan period and in particular Rydon Homes' promotion site at Anglely Lane, Sissinghurst.</p>	<p>As per 170-2</p> <p><u>Suggested changes:</u></p> <ul style="list-style-type: none"> TWBC should explore other reasonable alternatives in locations such as Cranbrook and Sissinghurst to help meet the shortfall in housing, which can also make a valuable contribution towards meeting need over the whole Plan period (such as promotion site at Anglely Lane, Sissinghurst (Rydon)) 	It is proposed that to meet additional housing need identified for years 10-15 in the plan period that the Council will undertake an early review of the local plan. The Council has identified that a policy will be required to be included, or modified to properly demonstrate this. It would be at this point that a call for sites would be undertaken to assess potential new sites such as those identified in the representation at Cranbrook and Sissinghurst.
174-5	Malcolm Dorrington				13 Updated housing land supply - Table 4 of the SLP		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	This is noted.

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
174-12	Malcolm Dorrington				11 Housing need and supply		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	This is noted.
175-1	Andrew Winser				13 Updated housing land supply – Table 4 of the SLP	<p>Table 4 should be update to a lower figure of 219 and an Upper figure of 253.</p> <p>Para 13.1 should be updated to refelct the evidence for these revised figures as follows:</p> <p>AL/HO1 has already been completed with 49 dwellings.</p> <p>AL/HO2 has been granted outline planning permission for 68 dwellings.</p> <p>AL/HO3 has an estimated allocation capacity of 115 to 165 dwellings in the SLP, but this is out of date and needs to be revised. The AL/HO3 site includes:</p> <ul style="list-style-type: none"> - A consented site with permission for 20 dwellings for which construction has begun. 16 to 24 dwellings have been included in the allocation capacity estimate for this part of the site. - SHELAA site 108 with an allocation for 8 to 12 dwellings which is privately owned and not being brought at this time and is unlikely to be 	<p>Updated housing land supply - Table 4 of the SLP: not legally compliant / unsound</p> <p>This representation is consistent with those submitted by Horsmonden Parish Council (PIFC_07) and Bassetts Farm Forum (PIFC_176)</p> <p>The capacities in the proposed revisions to Table 4 are out of date and inaccurate. Therefore, they are misleading and ineffective as per para 35 of the NPPF 2023.</p> <p>AL/HO1 has been completed with 49 dwellings.</p> <p>AL/HO2 has been granted outline permission for 68 dwellings.</p> <p>AL/HO3 has an estimated allocation capacity of 115 to 165 dwellings. This should be revised to 102 to 136. Please see the summary to PIFC_07 Horsmonden Parish Council's response for an explanation and justification to the revised figure.</p> <p>The overall allocation for Horsmonden in Table 4 should be: AL/HO1 at 49, plus AL/HO2 at 68, plus AL/HO3 at 102 to 136, totalling 219 to 253 dwellings.</p> <p>Additionally, PS_062 shows a change in the development trajectory compared to the previous version of the Local Plan Housing Trajectory (February 2021). This means the Infrastructure Delivery Plan (October 2021) is out of date for Horsmonden.</p> <p>Concerned with the provision of health services and primary education as they are already at capacity with no clarity of how the increase in population will be handled. Also concerned with the traffic, sewage, water mains and electricity infrastructure. Traffic is a critical safety issue</p>	<p>Table 4 of the Development Strategy Topic Paper Addendum (document ref: PS_054) reflects the most recent evidence on expected delivery at Horsmonden. The slightly lower figure for Horsmonden relates to the capacity of a site which was agreed by the Council to be somewhat lower than in the SLP, as discussed at the relevant hearing session in 2022, and following the submission and consideration of planning application reference 22/00296/OUT for village hall and a residential development of up to 68 dwellings and associated infrastructure (which members of the Council's planning committee have resolved to grant, subject to completion of a S106 legal agreement). AL/HO2 is pending decision for 68 dwellings. AL/HO3 is still under consideration. The application under consideration for AL/HO 3 is for 120 dwellings (ref 24/00078/HYBRID) and excludes permission for a further 20 dwellings (ref 19/03657/REM).</p> <p>The councils trajectory has been reviewed and delivers housing across a ten year period at a fairly standard figure between until 2034/2035. Appropriate levels of infrastructure have been included in the revisions to ensure delivery at the right time. THE IDP will be revised in due course to be consulted on as part of the Main Modifications.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>delivered within the next 10 years.</p> <p>- SHELAA sites 297 and 82 which according to the SHELAA methodology has an estimated capacity of 91 to 129 dwellings. (This being 115-165, minus 16-24, minus 8-12)</p> <p>However, Condition 8 of AL/HO3 requires further considerations on the extent of development to the eastern part of this site. Detailed LVIA discussions between the promoter of this part of the AL/HO3 and TWBC have resulted in the eastern development being limited to 22 dwellings which is a reduction of 13 to 19 dwelling compared to the original capacity estimate.</p> <p>It has also been acknowledged by TWBC that Bassetts Villas which is surrounded by land allocated for development as part of SHELAA site 297, is a Non Designated Heritage Asset and as such an allowance needs to be made to mitigate the setting and amenity of this heritage asset. A reduction of 4 to 6 dwellings around the area of Bassetts Villas is required.</p> <p>Therefore, SHELAA sites 297 and 82 allocation</p>	<p>which will be exacerbated by the allocations. Sewers near AL/HO3 currently overflow.</p> <p>Infrastructure must be delivered before any new housing can be occupied.</p>	

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>capacity needs to be updated to 74 to 104 dwellings. (This being 91-129, minus 13-19, minus 4-6)</p> <p>The overall estimated allocation capacity for AL/HO3 should therefore be 102 to 136 dwellings. (This being 74-104, plus 20-20, plus 8-12)</p> <p>The overall allocation for Horsmonen in Table 4 should be: AL/HO1 at 49, plus AL/HO2 at 68, plus AL/HO3 at 102 to 136, totalling 219 to 253 dwellings.</p>		
176-1	Andrew Winser	Bassetts Farm Forum			13 Updated housing land supply – Table 4 of the SLP		<p>Bassetts Farm Forum, which has 154 email subscribers, supports the submission by Horsmonden Parish Council (PIFC_07).</p> <p>SLP Table 4 is incorrect and does not reflect the current situation for the three proposed allocations in Horsmonden.</p>	The Horsmonden sites AL/HO 1, AL/HO 2, and AL/HO 3 were discussed at relevant hearing sessions and site sites outside of the scope of this consultation as none have been referred to in the Inspectors Initial Findings Letter (document ref: ID-012).
177-1	Granville Davies				13 Updated housing land supply – Table 4 of the SLP		<p>The housing allocation for Horsmonden is overstated, which should be 219 to 253 instead of 230 to 290 dwellings. This is because no allowance has been made for the Bassetts Villas heritage setting allowance, the Landscape and Visual Impact Assessment and Old Station Garage.</p> <p>There is also a mismatch in terms of timing with AL/HO2 and AL/HO3 being brought forward from 2030/2032 to 2026/2028. Originally the development was timed to coincide with the new medical centre. The NHS has not indicated when the new facility will be provided but seem to be looking towards the mid to late 2030s. The local</p>	The Horsmonden sites AL/HO 1, AL/HO 2, and AL/HO 3 were discussed at relevant hearing sessions and site sites outside of the scope of this consultation as none have been referred to in the Inspectors Initial Findings Letter (document ref: ID-012).

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>surgery is at capacity and will not be able to support an increased population.</p> <p>Development needs to be appropriate for a village and follows, not precedes, the provision of necessary infrastructure.</p>	
182-1		Maidstone Borough Council			11 Housing need and supply	<p>In order to be found 'sound', the Tunbridge Wells Local Plan needs to be positively prepared in that it must set out how it plans to meet identified needs in full over the plan period. The development expected in the final third of the plan period should not be left to a subsequent – albeit immediate – review of the plan. The risks associated with this approach, e.g. potential timetable slippages or change in political direction may place additional development pressures on TWBC at a later date.</p> <p>That being said, if the Inspector considers TWBC's approach to be sound in his final report – be that subject to any caveats of immediate plan review or otherwise; MBC would not seek to dispute this conclusion.</p>	<p>Housing need and supply - legally compliant but unsound</p> <p>The removal of Tudeley and reduction of housing at Paddock Wood and east Capel is understood by MBC. However, MBC does not consider the Plan to be positively prepared, and therefore, considers it unsound as it does not seek to meet the identified needs over the plan period to 2038.</p> <p>MBC are not in at a stage in plan-making to be able to consider accommodating any unmet housing or employment needs.</p> <p>To make the plan sound, development in the final third of the plan period should not be left to a subsequent review.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>
185-1		McCarthy Stone		The Planning Bureau	13 Updated housing land supply – Table 4 of the SLP		<p>Supports the Inspector's comments in the Initial Findings Letter (paras 89-93) relating to older peoples housing.</p> <p>Document PS_063 does not suggest any modifications relating to older peoples housing. Modifications should be</p>	<p>This is noted.</p> <p>The Council's approach to housing for Older People and People with Disabilities is set out in the Development</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Housing Need and Supply

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							put forward and consulted on in line with the Inspector's Initial Findings.	Strategy Topic Paper Addendum (PS_054) at Section 13.0 Updated housing land supply, dealt with at para 13.7 – 13.13. It is considered that any modifications required to Policy H6: Housing for Older People and People with disabilities can be dealt with and consulted upon through the 'Main Modifications' process.