

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

13.0 Updated housing land supply - Table 4 of the SLP

Which part of the plan does your comment relate?

Paragraph

What is the reference number?

13.1

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

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

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

13.1 Bullet 4 relates to changes to the capacity of allocations proposed for Horsmonden. The capacities quoted in the proposed revisions to Table 4 are out of date and inaccurate, as such they are misleading and ineffective contrary to NPPF 2023 para 35.

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

Table 4 should be update to a lower figure of 219 and an Upper figure of 253.

Para 13.1 should be updated to refelct the evidence for these revised figures as follows:

AL/HO1 has already been completed with **49 dwellings**.

AL/HO2 has been granted outline planning permission for **68 dwellings**.

AL/HO3 has an estimated allocation capacity of 115 to 165 dwellings in the SLP, but this is out of date and needs to be revised.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:

- 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 delivered within the next 10 years.
- 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)

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.

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.

Therefore, SHELAA sites 297 and 82 allocation capacity needs to be updated to **74 to 104 dwellings**. (This being 91-129, minus 13-19, minus 4-6)

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)

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.

Please use this box for any other comments you wish to make.

Document PS_062 Updated Local Plan Housing Trajectory (December 2023), referenced in this consultation, shows developments at AL/HO2 and AL/HO3 both taking place between 2026 and 2028 (with the consented 20 houses at AL/HO3 being completed earlier than this). This is a change for AL/HO3 which was projected to take place between 2030 and 2032 in the previous version of the Local Plan Housing Trajectory (February 2021) used in discussions with the SLP Inspector in 2022.

This change in the planned timing of the delivery of the allocations for Horsmonden means that the Infrastructure Development Plan (IDP) (CD_3.142_Infrastructure-Delivery-Plan-October-2021) referenced as part the SLP is **out-of-date**.

There is no capacity for more patients at the Horsmonden GP practice today and the NHS has not even begun to work out how it will provide health services for the expansions. The Primary School is full and there is no clarity of how the increase in new pupils will be handled. Traffic volumes and traffic speeds are critical safety issues which can only be exacerbated by the allocations which will increase the population of the village by over 40%. Sewers near to the AL/HO3 site overflow today even before any development. And the capacity of water and electricity supplies to cope with the large relative expansion has not been confirmed. **The delivery of infrastructure must be tied to any allocated development such that NO new housing can be occupied unless the necessary infrastructure changes are completed first.**

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

Yes, I wish to participate at the examination

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

I am concerned that the issues identified for Horsmonden may be disregarded as being on a smaller scale than other matters of concern in the SLP. The SLP allocations for Horsmonden amount to a 40% to 50% increase in the village population and these developments are now coming forward within the next 5 years. Such a change to the community is very significant and so I wish to ensure that the issues for Horsmonden get a fair hearing.

Please note that these representations are fully consistent with those submitted by the Horsmonden Parish Council and the Bassetts Farm Forum