

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
2-1	Graham Clark				12 Conclusions on preferred development strategy option		<p>The strategy was flawed from the start but the loss of 3100 unit is disastrous given the Borough's housing need. Any shortfall in housing needs to be planned for now, pledging an early review is not good enough.</p> <p>A fresh call for sites should be undertaken to come up with a revised strategy.</p> <p>Plan period should be extended to 2040.</p> <p>Development should be focussed in Royal Tunbridge Wells due to range of services and facilities; Family housing rather than flats and accommodation for the elderly is needed in RTW, a significant portion of which needs to be affordable.</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> <p>The Local Plan review will require its own evidence base which will inform any future development strategy, and matters such as housing need and requirements.</p>
10-1		Obsidian Strategic	Daniella Marrocco		12 Conclusions on preferred development strategy option		Obsidian Strategic Asset Management Limited, who have a controlling interest in AL/PE 2, support the revised development strategy and progression of a 10-year housing land supply position as a way of accelerating the adoption of the Local Plan and meeting housing needs.	This is noted.
21-1		Taylor Wimpey Strategic	Ryan Johnson	Turley Associates	Appendix C: Proposed changes to the Strategic Policies	<p>Additional sites should be allocated to enable compliance with Paragraph 69 of NPPF, to address the shortfalls highlighted in the period in response to section 5 of this form. This will need to include further 'deliverable' sites to ensure compliance with</p>	<p>STR1 (and table 3) - unsound (neither effective or consistent with national policy): Plan period.</p> <p>Base year for calculating Housing Need updated to 2023 to accord with PPG - concur with this approach.</p> <p>However, revised Table 3 and Policy STR1 start plan period in 2020, and use 2023 calculated figure from 2020, instead of 2023</p>	<p>The council's current published position (October 2023), based on the National Planning Policy Framework (NPPF) published in September 2023, identifies a housing land supply of 4.29 years. This position is inclusive of a 5% buffer as previously required in the national planning guidance at the time.</p> <p>However, as identified above, the NPPF was updated in December 2023. Paragraphs 77 and 226 of the NPPF make it clear that Local Planning</p>

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						<p>Paragraph 69 (a) of NPPF, with respect to the first five years of the plan period post the intended date for adoption of the Local Plan.</p> <p>We would suggest a useful starting point would be to revisit those sites deemed 'reasonable alternatives' through the SA process. Our client's site (SHELAA Ref: 25) is confirmed as a 'reasonable alternative site' at Cranbrook in Table 53 (Page 150) of the SA (2021). As outlined in our Matter 5 Hearing Statement, our client has confirmed the availability, suitability and achievability of this site within the first five years of the plan period. We would respectfully request the Council allocate this and other sites to address the deficiencies highlighted, with a further round of consultation undertaken on such modifications prior to resuming the examination process.</p>	<p>(table also includes completions from 2020-2023) - incorrect and does not accord with PPG.</p> <p>Solution: Table and policy should start with the baseline year of 2023, and given this is a strategic policy, look forward 15 years from anticipated adoption in 2024/25 (NPPF para 22). Plan period should therefore be 2024-2039 (this approach was recently endorsed/confirmed in the EiP of the Dartford Local Plan).</p> <p>Housing Land Supply (HLS). TWBC's latest 5 year HLS Statement (Oct 2023) indicates 4.29 years HLS (as of 1st April 2023). Paras 39-40 of Statement confirms emerging site allocations not included. Given this, unclear how TWBC can claim an enhanced position of 6.13 HLS (para 13.5 of Local Plan Development Strategy Paper - Addendum(Nov 2023)). Increased assumed windfall allowance by 520 homes (justification - paras 11.7-11.20 of above Addendum). Based purely on last 4 years of completions. However, looking at data over the last four years does not justify adopting a different approach to future years. Suggest TWBC revert to SLP approach (with built in discounting to reflect uncertainty over a 15 year period).</p> <p>Plan as presented does not accord with NPPF para 69.</p> <p>Solution: Additional sites should be allocated to enable compliance with NPPF para 69 to address shortfalls. Will need to include further 'deliverable' sites to ensure compliance with NPPF Para 69 (a). Start be revisiting sites deemed as reasonable alternatives through SA process such as SHELAA site 25.</p>	<p>Authorities will only be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing against local housing need (where adopted housing requirements are out-of-date) where the Local Planning Authority has an emerging Local Plan that has been submitted for examination or has reached Regulation 18 or 19 stage. Given that the council's emerging Local Plan is currently subject to examination, the council is only required to demonstrate a four-year supply. Moreover, the 5% buffer to the four and five-year target requirements is no longer applicable, and given the council's latest Housing Delivery Test result of 96%, no other buffer should be applied.</p> <p>The council received clarification from the Department for Levelling Up, Housing and Communities (DLUHC) on 5 February 2024 that the four-year supply requirement will be based on the performance against 5-year housing land supply, and not an alternative calculation. This has also been updated in the Planning Practice Guidance. Given this clarification, the council can confirm the following:</p> <p>The required four-year supply requirement calculated against a five-year supply (and no 5% buffer) results in a supply position of 4.50 years as at 1 April 2023. This position takes account of the shortfall in housing supply between 1 April 2020 – 31 March 2023.</p> <p>Housing supply and windfall sites have been calculated on the basis of historic delivery. Small sites over a period of 17 years, and large sites over a 4 year period. The DSTPA (PS_054) sets out the justification for these calculations and why the council considers the approach to windfall to be sound.</p> <p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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								<p>'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>
25-1	David Parrish on behalf of Capel Greenbelt Protection Society	Capel Greenbelt Protection Society	David Parrish	Chair	8 Overview and Conclusions	<p>It needs to be clarified/confirmed that the Garden Village at Tudeley will not be reconsidered in any future review - due to the already established reasonings by the Inspector at the first Reg 19 consultation stage.</p>	<p>The amended plan at section 15 - Proposed Strategic policy revisions is considered to be legally compliant but not sound in regard to the following;</p> <p>TWBC have improved the Local Plan by excluding the Tudeley Garden Village proposal but it should exclude it from any future reviews for the reasons below;</p> <p>Traffic to Tonbridge is already congested at peak times; concern over liaison with TMBC.</p> <p>Should also not develop in East Capel due to it being in the Green Belt and no exceptional circumstances established and concern over flood risk, traffic issues and alternative sites in the borough have not been considered.</p> <p>It needs to be clarified/confirmed that the Garden Village at Tudeley will not be reconsidered in any future review due to the already established reasoning by the Inspector.</p>	<p>This is noted, however the Council feels it is not appropriate to exclude Tudeley Garden Village from future Local Plan review(s) because it would not be good planning to do so. Like any other sites to be assessed through future reviews, Tudeley Village would be assessed on its own merits, taking account of available evidence and supporting information available at the time of any review.</p> <p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed and impact on Tonbridge considered to be acceptable.</p> <p>The Inspectors Initial Findings letter has agreed with the Council that Paddock Wood and land at east Capel is a 'logical choice' for growth as set out in the SLP 4.44 'being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and,</p>

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								except for land to the west, beyond the Green Belt.'
32-2	Gavin Steele	N/A			14 Commitment to early review	A more imaginative approach which gives residents at least some degree of certainty as to future development rather than a never ending Plan review process.	Decision to move to a 10 year plan is understood. However, this presumably means a new Call for Sites and the whole borough will be subject to years of ongoing uncertainty. A more imaginative process which gives residents some degree of certainty.	<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> <p>It will, in the meantime enable the Council to progress to adopt the Local Plan, albeit with a 10 year housing land supply, which will allow plan-led development for the next 10 years and sustainably boosting housing delivery, and provide more rather than less certainty. This is considered a sensible approach given the Government is wanting Local Authorities to progress and get Local Plans adopted.</p>
47-3	Emma Cunnington on behalf of Sport England	Sport England	Emma Cunnington	Planner	Appendix C: Proposed changes to the Strategic Policies	With the proposed delivery of approximately 12,000 homes across Tunbridge Wells, Sport England would highly recommend the use of Active Design as a measure to ensure that new development provide healthy and active environments and are	<p>Sport England consider that the amended Plan is both legally compliant and sound.</p> <p>Sport England recommend using Active Design as a measure to ensure that new development provides healthy and active environments and are well connected to facilities and services. This design guidance should be used by TWBC to provide a checklist for all new developments and could be added as part of STR1.</p>	<p>This is noted.</p> <p>The Council considers it appropriate that consideration is given to active design when assessing planning proposals at the planning application stage. It could also be included in future work on design coding. In relation to plan-making and the policies of the Submission Local Plan, the Council considers that it could be appropriate to reference active design in some</p>

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						<p>well connected to facilities and services. Sport England, with the support of the Office for Health Improvement and Disparities (OHID) and Active Travel England (ATE), has produced 'Active Design' https://www.sportengland.org/facilities-planning/active-design/, a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments are designed to incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. It is therefore requested that Active Design is recommended to be used as a checklist for all new developments within the Tunbridge Wells Development Plan, especially as the inspectorate has identified a need for sustainable travel through these developments. This</p>		<p>policies, such as the overarching strategic policies for each settlement or parish. This could be done and consulted upon through the 'Main Modifications' process.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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							could be added as part of STR1.	
48-1	Hannah Gooden on behalf of Sevenoaks District Council	Sevenoaks District Council	Hannah Gooden	Planning Policy Team Leader	1 Introduction		<p>Plan legally compliant/sound:</p> <p>SDC notes all the proposed changes to the Tunbridge Wells Local Plan development strategy in response to the Inspector's initial findings, and confirms the Plan to be both legally compliant and sound.</p> <p>Recognised that reducing the plan period to 10 years, will require an immediate review.</p> <p>The national planning system is changing, so right to adopt this approach, allowing plan-led development for the next 10 years and sustainably boosting housing delivery.</p> <p>SDC will continue to work positively with TWBC in the progression of both their Local Plans, including updating an existing statement of common ground in relation to cross boundary issues.</p>	This is noted.
54-1	Christine Spicer				10 Consideration of development strategy options		<p>Preferred option includes No Tudeley village; Paddock Wood, including land in East Capel; Reduced housing: all limited in Flood Zone 1; Employment land: similar to the PSP, but excluding land is/will be in Flood Zone 3, while including land supposedly within Flood Zone 2.</p> <p>This essentially corresponds to the Inspector's Option 3 - delete Tudeley Village.</p>	This is noted.
56-1	Konrad Legg				8 Overview and Conclusions		<p>The amendments made to the Local Plan make it sound in regard to the removal of Tudeley Garden Village which is supported. However, concern that it will be considered again at some point.</p> <p>Also support the reduction of housing at Paddock Wood and East Capel but needs to</p>	<p>This is noted. It is acknowledged that Tudeley Garden Village could be considered further in future Local Plan review(s).</p> <p>The Development Strategy Topic Paper, October 2021 (Core Document 3.126) explains how the development strategy for the Pre-Submission Local Plan was formulated (at Section 6.0), including consideration of alternative strategies,</p>

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							<p>go further to reduce the impact on the green belt - coalescence and urban sprawl.</p> <p>Concern over existing infrastructure at capacity, particularly education, health. Disappointing that not more development on brownfield sites such as Blantyre House and land in Horsmonden.</p>	<p>and consideration of exceptional circumstances for Green Belt release. An addendum to this topic paper has been prepared following the Inspectors initial findings, document PS-054. It is considered that the Council's approach to the Green Belt accords with paras 145-148 of the NPPF, which has been considered at previous hearing sessions (Matter 3, Issue 4: Management of Development in the Green Belt). The revisions to the Submission Local Plan, subject of this consultation, are supported by appropriate evidence.</p> <p>The Development Strategy Topic Paper revised October 2021 (Core Document 3.126) at Section 6 E sets out the Council's approach to ensuring effective use of land in built up areas and suitable brownfield sites. It is also dealt with specifically in the Brownfield and Urban Land Topic paper, January 2021 (Core Document 3.83) which at para 3.2 sets out that a key principle underpinning the overall strategy of the Pre Submission Local Plan should be to make the optimal use of development on brownfield land, particularly in accessible locations, including the borough's town centres and other locations well served by public transport. This is an important strategic issue in a borough that has important heritage and landscape constraints (including Areas of Outstanding Natural Beauty) and Green Belt. This key principle still applies to the revised development strategy.</p>
64-10	Adrian Pitts				15 Proposed strategic policy revisions		<p>Seconded the suggestion by the Inspector for Tudeley Village deletion as the plan should come forward only when a detailed thought-out infrastructure plan is in place.</p> <p>Inadequacies raised about the early review within 5 year while dismissing the opportunities for a fit-for-purpose preparation.</p>	<p>This is noted.</p> <p>The appropriateness and timing of a Local Plan review is likely to be discussed at the future hearing sessions. TWBC feels that 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</p>

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								<p>2024 at section 14 [core document PS_054]. It will, in the meantime enable the Council to progress to adopt the Local Plan, albeit with a 10 year housing land supply, which will allow plan-led development for the next 10 years and sustainably boosting housing delivery, and provide more rather than less certainty. This is considered a sensible approach given the Government is wanting Local Authorities to progress and get Local Plans adopted.</p> <p>It is noted that 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>
67-7	Andrew Stanley				12 Conclusions on preferred development strategy option		<p>Conclusions on preferred strategy option: Unsound:</p> <ul style="list-style-type: none"> • Terms 'housing need' and 'local need' used repeatedly - strange that Capel needed approx. 5,000 houses in a rural parish with only around 2,000 residents • Also strange that rural parish of Capel (in Green Belt/adjacent to AONB/parts in flood zone) requires 4,500 houses and other villages have no/minimal needs. Capel sacrificed to save Paddock Wood • Paddock Wood is already building 1,300 new houses when in reality they are being purchased by London Boroughs • Housing numbers are advisory - TWBC has made no attempt to claim special circumstances despite AONB and Green Belt • TWBC has failed to carry out Inspector's request to assess reasonable alternative sites, and has reviewed a narrow area to conclude nowhere else suitable for development 	<p>The standard method has been used in calculating the Councils projecting housing needs as is required by national policy. 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>The Green Belt Stage 3 Addendum (PS_035) explains at Chapter 2 what is considered to be a reasonable alternative site to be assessed through the Green Belt Stage 3 Addendum work, and the site assessment methodology. The Council considers that all reasonable alternative sites have been appropriately identified and robustly assessed by the Green Belt Stage 3 Addendum.</p> <p>The Inspectors initial findings were very clear, where at para 6, specific reference is made to the 'all reasonable alternative' Green Belt sites needing a Stage 3 Green Belt assessment, not all Green Belt sites and not non-Green Belt sites. In terms of other sites, the Council has not</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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								considered it necessary to review either non-reasonable alternative Green Belt sites or non-Green Belt omission sites. These have previously been assessed by the SHELAA process, which has been considered at the earlier examination hearing session held on 27 May 2022 for Matter 5, Issue 1: Site Selection Methodology and dealt with in the Hearing Statement TWLP/021 .
67-8	Andrew Stanley				6 Infrastructure		Infrastructure - Unsound: Unable to comment on this area because the overall plan is flawed.	TWBC does not consider the Local Plan to be flawed. Future hearing session will enable the Inspector to determine whether the Local Plan meets the tests of soundness.
69-1	Carol Richards				15 Proposed strategic policy revisions		Removal of Tudeley Village and less housing development in East Capel and Flood Zone 1 and reduced industrial use in Flood Zone 2 welcomed. Enough development planned in Paddock Wood and only fair development is focussed in other parts of borough in future.	This is noted. This is noted, any future growth in the borough including the future development strategy (in the Local Plan review for example) will need to be evidence-led, informed by future evidence base work.
71-2	Caenwood Estates			DHA Planning	15 Proposed strategic policy revisions		Whole amended strategy -legally compliant/sound: Agreed important that TWBC gets a Local Plan in place as soon as possible to ensure it can meet housing needs over next 10 years. Support proposed changes to Local Plan strategy, resulting in a sound Local Plan.	This is noted.
75-1	John Collins	DHA Planning			8 Overview and Conclusions		<ul style="list-style-type: none"> TWBC has not responded to Inspector's comments in a positive way - having decided to delete Tudeley and part of Paddock Wood, they have not looked how loss of units can be re-dressed. While TWBC has looked at some of matters raised by the Inspector, this is limited mainly to Green Belt sites. Given government policy on general 	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.

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							<p>protection of the Green Belt, not understood why TWBC did not review/revisit the smaller scale sites removed from the Plan following the Regulation 18 stage. Therefore, the Plan has not been positively prepared and TWBC should be required to undertake this process to ensure future delivery of identified housing need.</p> <ul style="list-style-type: none"> Statistics show TWBC has consistently under-delivered in respect of housing (last 9 of 11 years) owing to a trend of consistently over predicting and failing on delivery - over reliance on large scale sites and asserted delivery within existing urban areas, rather than the appropriate identification of “less sensitive” edge of settlements sites in sustainable settlements. (While this representation is not site specific, it should be noted that the site promoted as land at Quaker Lane/Angle Road Cranbrook falls into this category and is a prime example of where TWBC has failed to revisit the suitability of a site). Not confident Plan will deliver required housing needs at an appropriate rate – a further new Local Plan could be expected to take another 2-4 years, resulting in years of under delivery and increasing shortage of affordable housing. In the case of Paddock Wood, while the allocation is sensible, multiple land ownerships, flood risk and drainage and infrastructure issues will inevitably mean that the planned number of units are unlikely to be delivered within 5 years. <p>In summary:</p> <ul style="list-style-type: none"> TWBC’s previous strategies have not delivered adequate housing and the deletion of over 3,200 units allied with over reliance on the delivery of units on 	<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.</p> <p>The Inspectors initial findings were very clear, where at para 6, specific reference is made to the ‘all reasonable alternative’ Green Belt sites needing a Stage 3 Green Belt assessment, not all Green Belt sites and not non-Green Belt sites. In terms of other sites, the Council has not considered it necessary to review either non-reasonable alternative Green Belt sites or non-Green Belt omission sites. These have previously been assessed by the SHELAA process, which has been considered at the earlier examination hearing session held on 27 May 2022 for Matter 5, Issue 1: Site Selection Methodology and dealt with in the Hearing Statement TWLP/021.</p> <p>The DSTPA (PS_054) indicates that there would be a 6.13 year supply at the point of adoption, meaning the council can be confident in housing delivery rates whilst it undertakes an early review of the plan, to establish further housing sites.</p> <p>Paddock Wood and land at east Capel site (STR/SS 1) is well advanced with t 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 council Strategic Housing and Economic Land Assessment (SHELAA) reviewed the sites in the SLP for appropriateness. Further work has</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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							<p>brownfield land will inevitably lead to failed housing delivery rates.</p> <ul style="list-style-type: none"> The failure to properly review all sites at this stage means the Plan cannot proceed unless substantial further work is undertaken. 	<p>been undertaken on Green Belt sites, and this is in the High Weald national landscape in the evidence base. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83. The council feels the most appropriate way forward will be for an early review to identify further appropriate land for housing delivery.</p> <p>The Governments Housing Delivery Test was introduced in 2018 as a monitoring instrument to demonstrate whether local authorities are delivering sufficient homes to meet their housing need. The latest HDT results were published in January 2022 and the council delivered 97% against the requirement, which means no consequence for the council. This and the Housing Land Supply figure will ensure that the council continues to meet necessary housing delivery targets.</p>
91-1	Peter Rawlinson	Gleeson Developments Ltd			15 Proposed strategic policy revisions		<p>The Local Plan is Legally non-compliant/Unsound on the grounds of:</p> <ul style="list-style-type: none"> The lack of housing land allocations and overreliance on an early review despite the decrease in dwellings from PW and Tudeley Village Non-compliance to National Policy of a 15-year housing land supply Reiterated objection to the flawed Green Belt's release at the edge of TW Strong objection to the unjustified proposed designation of 'Land at Pembury Road, Tunbridge Wells' as a Local Green Space in lieu of a potential residential site allocation 	<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> <p>The Council does not consider its Green Belt release at the edge of Tunbridge Wells to be flawed. Green Belt release has been dealt with at earlier examination hearing sessions, particularly</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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								<p>matter 3 (Issue 3) and Matter 4, Issues 1-3 inclusive, heard on 26 and 27 May 2022 respectively.</p> <p>Regarding 'Land at Pembury Road' this site was included within the Green Belt Stage Three Addendum (PS_035) as it fell within the scope of work requested by the Inspector. The conclusions on that work and the Councils approach are set out within the Green Belt Addendum, the relevant SHELAA sheet (PS_036) and the Development Strategy Topic Paper Addendum January 2024 (PS_054).</p> <p>The site has been considered through the SHELAA process and the conclusions with regards to its suitability for allocation remain the same irrespective of the additional Green Belt work.</p>
91-2	Peter Rawlinson	Gleeson Developments Ltd			10 Consideration of development strategy options		<p>Concerns over the strategy's modifications:</p> <ul style="list-style-type: none"> • Non-compliant to the minimum 15-year plan period requirement set out at paragraph 22 of the NPPF • Unsound approach of not finding alternative sites resulting from the reduction in PW and Tudeley Village units • Suspect an overrun of the early review down the road 	<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>
94-1		Historic England			15 Proposed strategic policy revisions		Historic England previously had concerns on the proposed Development Strategy but think that the proposed amendments to remove Tudeley Village and the revision for Paddock	This is noted.

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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							Wood and land at East Capel are likely to be beneficial in historic environment terms. Note that these comments are based on information provided as part of this consultation and that they may provide further advice and potentially object to specific proposals which may arise and have an adverse effect on the historic environment.	
95-1	Mark Behrendt	Home Builders Federation			15 Proposed strategic policy revisions		<p>Concerns over the proposed Development Strategy STR 1 in relation to housing land supply:</p> <ul style="list-style-type: none"> • STR 1 in effect looks ahead for only 10 years rather than the 15 required by national policy • The supply over the 10 years provides very little headroom • The use of the Liverpool methodology for assessing the five year housing land supply 	<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> <p>The Council has calculated housing need using the Sedgfield standard methodology. Within each five-year supply position statement, the Sedgfield 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 Sedgfield/shortfall approach encourages a 'bounce-back' in housing supply by increasing the</p>

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								<p>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.</p> <p>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 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>
95-2	Mark Behrendt	Home Builders Federation			Appendix C: Proposed changes to the Strategic Policies		<p>Disagree with the STR 1's timescale of 10-year housing land supply due to:</p> <ul style="list-style-type: none"> • Inconsistencies with paragraph 22 of the NPPF • No due consideration given to pause the plan to seek and allocate alternative sites, using weak justification of pausing means not having a local plan • Sustainability Appraisal apparently down played the benefits of a 15-year supply 	<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</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								<p>"where possible" for years 11-15 of the remaining plan period.</p> <p>This approach will enable the Local Plan to be adopted sooner, providing more certainty and a five year housing land supply.</p> <p>Whilst there are also options of reassessing previously less sustainable options in order to provide the full 15-years housing land supply, different distribution options have already been appraised through the Sustainability Appraisal. Therefore, rather than reappraise them, the further option at this stage would be to suspend the examination to carry out this re-evaluation. Hence, this option presented in the SA is very similar to the previous "no plan" option. The council's proposals comply with paragraph 68 of the NPPF – with a commitment to an early review.</p>
126-3	Margaret Borland				12 Conclusions on preferred development strategy option		<p>Yes, the Plan is now legally compliant and sound in regard to the following;</p> <p>the reduction in the overall level of housing in Paddock Wood avoiding development in higher flood zones.</p> <p>Removal of Tudeley Garden Village - due to impact on Green Belt and sustainability of the new settlement.</p> <p>The amended period of the plan and the need for early review.</p>	This is noted.
126-4	Margaret Borland				14 Commitment to early review		The Plan is now legally compliant and sound and support the commitment to an early review of the Plan and the outline scope of the review set out.	This is noted.
128-1	Matthew Smith	Berkeley Strategic Land Ltd			15 Proposed strategic policy revisions	To secure a greater commitment to, and certainty surrounding the timing of the early review, we respectfully request that Policy STR 1 be	STR 1 - The Development Strategy in reference to SLP Mod 3 in PS_063 (Summary of Proposed Modifications to Development Strategy) - legally compliant but unsound Supportive of commitment to progress an early review of the Local Plan. However, the	The timing of a Local Plan review is likely to be discussed at the future hearing sessions. TWBC feels that 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

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>amended to include the alternative wording shown below:</p> <p>"The Council will commence a review and update of the plan immediately following adoption of the Tunbridge Wells Borough Local Plan to ensure to ensure the timely delivery of additional housing in the period from 2034.</p> <p>In practical terms this will mean that the Borough Council commences its review early in 2025, with an objective to complete a review before the end of 2027. The Council will be revising its Local Development Scheme during 2024 to confirm the timetable for the review. In accordance with the NPPF, the review will also need to plan for a 15-year period from the date of its adoption."</p>	<p>proposed wording to be added to Policy STR1 provides no indication of when early review will commence and the new plan adopted. If 5 years after adoption, would have severe implications on housing supply.</p> <p>Solution: To secure commitment and certainty re timing of early review, requested Policy STR 1 be amended:</p> <p>"The Council will commence a review and update of the plan immediately following adoption of the Tunbridge Wells Borough Local Plan to ensure to ensure the timely delivery of additional housing in the period from 2034."</p>	<p>Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. It will, in the meantime enable the Council to progress to adopt the Local Plan, albeit with a 10 year housing land supply, which will allow plan-led development for the next 10 years and sustainably boosting housing delivery, and provide more rather than less certainty. This is considered a sensible approach given the Government is wanting Local Authorities to progress and get Local Plans adopted.</p>
134-6		National Highways (formerly Highways England)			14 Commitment to early review		<p>In terms of the commitment to early review, National Highways make the following comments;</p> <ul style="list-style-type: none"> • If an immediate review should commence after adoption, the evidence base would need to respond effectively to the expectations of national policy relating to SRN and wider transport matters at the time. • also emphasise the commitment to early review is not sufficient if it is to be used as a reason to defer resolution of 	<p>It is acknowledged that the Local Plan review would need to be supported by a new suite of evidence base documents, including on transport/highways matters. TWBC would seek to continue the positive engagement that has so far taken place with both National Highways and Kent County Council (KCC) Highways on highway related matters.</p> <p>TWBC is seeking to resolve outstanding technical matters, and has had continued engagement with National Highways on these. It is anticipated that</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							the outstanding technical matters highlighted in our response to this consultation which may be necessary to ensure the soundness of the plan.	a further (Stage 4) Technical Note will be available ahead of future examination hearing sessions, with the intension that this will be agreed with both National Highways and KCC Highways in advance of those.
140-3		Cooper Estates Strategic Land	Katherine Miles	Pro Vision	14 Commitment to early review	Please see our statement accompanying these representations but in summary: Extend the plan period to 2040, increase the housing requirement for the full minimum 15 years from adoption, and make additional allocations to meet needs in full.	The proposed changes to the Local Plan are neither legally compliant or sound in regard to MOD2 and MOD3, Table 3 and 4 and the following comments are made; <ul style="list-style-type: none"> The Plan fails to meet the area's objectively assessed need and is not consistent with national policy. The commitment to early review is not a true commitment - there is no timescale and evidence shows that early reviews have been unsuccessful elsewhere. The plan period should be extended to 2040 and the housing requirement for the full 15 years from adoption and make additional allocations to meet needs in full. A number of concerns are raised around the plan period and the date for adoption meaning that the Strategic policies do not meet the requirement of para 22 of the NPPF and the NPPG requiring a 15 year period. Consider that the plan period should look ahead to 2039 or 2040 with a gross housing need of 12,673-13,340. The commitment to an early review does not put right the errors the Council has made in preparing the Submission Local Plan - failure to undertake a comprehensive review of the Green Belt for example and to make decisions based on evidence. Reference to examples of early Local Plan review and how these have not advanced and the Council has made now clear commitment to when the review would be. 	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'. 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. If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan. It is considered that there would be discussion about the timing of the Local Plan review at the future hearing sessions.

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							<ul style="list-style-type: none"> The Council has both a high affordable housing and older persons housing need and clear justification to get it right first time. The Council has accepted that it has a high unmet need for older persons housing, but continues to confuse its need for Care Homes with its need for extra care housing. <p>As a result, the Council continues to make inadequate provision through site allocations to meet its need. This is not a sound strategy and will not address the critical need for older persons housing.</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.
149-3	Rosemary Danby				14 Commitment to early review		<p>Concerns over the 10-year early review:</p> <ul style="list-style-type: none"> Against Planning Practice Guidance for strategic policies timespan of minimum 15 years Unreasonable 2500 houses over 10 years that requires an immediate revisit 	<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>
152-1	Save Capel				8 Overview and Conclusions	<p>7. Further work that TWBC should be required to undertake</p> <p>7.1. SC acknowledges and supports the first essential change made by TWBC in the RSLP</p>	<p>Save Capel consider that the proposed changes to the Local Plan are unsound in regard to the Overview and Conclusions and raise the following points;</p> <ul style="list-style-type: none"> Save Capel support the first change to the Local Plan in the deletion of TGV in an attempt to make the Plan sound, but still 	<p>The support for the removal of the allocation at Tudeley (STR/SS 3) are noted.</p> <p>TWBC approach has been to respond to the Inspectors Initial Findings (ID-012) to seek to resolve soundness issues and to get the plan adopted. The council review all of its reasonable alternative sites as part of a Green belt Study part</p>

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>towards making the Local Plan sound – the deletion in full of the TGV proposal. This was a major step towards the production of a sound local plan. However, what has now been presented in respect of development at PW and EC stills remains problematic and the local plan cannot, as it is currently drafted, be considered to be sound.</p> <p>7.2. The steps set out below in this section are presented to help achieve a sound local plan which does not include the TGV allocation or the proposed development. To re-introduce that allocation would not (as discussed above) render the plan sound. As such, alternatives have to be considered.</p> <p>7.3. SC's three principal concerns in respect of the soundness of the RSLP are:</p> <p>1. That TWBC, having deleted TGV, which was a strategic component of its Plan, should take a far deeper review of its planning strategy than was evident in the RSLP in order to achieve its housing requirement by reference to the 'standard method' – see section 2 above.</p>	<p>raise concerns with regards to the amendments which have been made to in respect of development at Paddock Wood and East Capel which are still considered to be problematic and render the Plan unsound. this is due to the following;</p> <ul style="list-style-type: none"> ○ Following the deletion of TGV, TWBC should take a deeper look at its proposed strategy to meet housing needs than has been carried. ○ Key focus of review should be a focused, serious and committed review of alternative sites throughout the borough, not just at Capel. ○ TWBC should also consider urban sites, vacant commercial space, sites on the periphery of urban centres, transport and infrastructure within Capel must be a pre-requisite before any further development is undertaken. <ul style="list-style-type: none"> • Save Capel consider that the above work should be undertaken and therefore its timetable reviewed to allow this to be carried out. • Save Capel also notes the Call for Sites for RTW Town Centre which should be considered now alongside this work. • Save Capel consider that insufficient further work to date since the Inspectors Initial findings has been carried out by TWBC and that without this, the plan is considered unsound. • In conclusion, Save Capel welcomes the removal of TGV but continues to have serious concerns about the revised strategy for the strategic sites at Capel and Paddock Wood and the revisions to the plan are unsound. It is also considered that the Local Plan is paused whilst TWBC carried out a fundamental review of its spatial strategy before it progresses any further with the examination. However, Save Capel do not recommend the withdrawal of the 	<p>3 Addendum. A Green Belt Study 3 Addendum report (PS 035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD 3.77 and PS 036) has indicated that all available sites have been utilised in the plan. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83</p> <p>The council through this work has committed to an early review the plan.</p> <p>The Council is in the early stages of preparing a Royal Tunbridge Wells Town Centre Plan (RTW TCP) and a call for sites has been undertaken. This has indicated a relatively low number of potential sites. Nevertheless a review of the acceptability of these sites is underway. The aim of the RTW TCP is, amongst other things, to help the delivery of policy STR/RTW 2 and 150-200 dwellings.</p>

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						<p>2. That a key component of such a review should be a focused, serious, and committed reconsideration of alternative sites throughout the Borough. There remains no expressed justification for TWBC seeking to allocate 28% of its overall housing allocations to Capel – see from para 2.43 above.</p> <p>3. Further, as part of the review, SC also recommends:</p> <ul style="list-style-type: none"> a) a re-assessment of the potential urban opportunities from changes in legislation that promote the change of use of urban sites to residential, b) a proper assessment of the significant opportunity from the vacant commercial space (offices, shops, etc.) which has arisen during and since the Covid-19 pandemic. This reconsideration now needs to be completed as a matter of urgency, c) a serious assessment of sites on the periphery of urban centres, where infrastructure will be more readily available and, as a result, development can be made sustainable, rather than creating urban 	<p>Plan at this stage as there are a number of good policies and strategic allocations.</p>	

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						<p>centres around villages in open countryside without the required (and costly) infrastructure needs, and</p> <p>d) that improvement of Transport and Infrastructure within Capel, which in parts is already at or over design capacity, must be a pre-requisite before any further development is undertaken, whether inside or outside a Local Plan – and specifically this is a pre-requisite to be addressed <u>prior</u> to the consideration of any development at East Capel.</p> <p>7.4. SC therefore urges TWBC to extend its timetable to complete the wholesale and fundamental review of its planning strategy, within the structure of the RSLP, including a review of alternative sites throughout the Borough as the core part of that reconsideration. Any such review should have as a key assumption the need to <u>prevent</u> any development within Capel <u>prior</u> to delivering improvements in local Transport and Infrastructure.</p> <p>7.5. SC notes TWBC's call for sites in central</p>		

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						Tunbridge Wells on 23 February 2024. Given the potential sites already identified in the SHELAA studies and by SC, we strongly recommend that those are considered actively and seriously now before any new calls for sites outside central Tunbridge Wells are considered.		
153-5	Fernham Homes		Danielle Dunn		14 Commitment to early review	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation.	<p>Commitment to early review - Legally non-compliant/unsound:</p> <p>Document PS_054 sets out TWBC's commitment to an early review of the Local Plan. Although objection raised to non-inclusion of SHELAA site 143 (Tolhurst Road, FOG) in the current SLP, would support an early review of the Plan with inclusion of this site.</p>	<p>The Council does not consider assessment of the reasonable alternative Green Belt sites in the SHELAA review of Green Belt sites (PS_036) to be flawed. The SHELAA site assessment sheet for site 143 Land at Tolhurst Road, Five Oak Green acknowledges the Low harm rating and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (Core Document 3.77) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in determining site allocations to be included in the new Local Plan.</p> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most</p>

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								<p>suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p> <p>The Council does not agree with the proposed modification put forward.</p>
153-6	Fernham Homes		Danielle Dunn		12 Conclusions on preferred development strategy option	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation.	<p>10 Year Plan Period and Housing Supply - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> NPPF Para 22 and Planning Practice Guidance make clear strategic policies should look ahead over a minimum 15 year period and plan for the full plan period – therefore, proposal to reduce plan-period to 10 years does not accord with national policy and is unsound Shortened Plan timescale unlikely to deliver/meet housing need (including affordable housing need of 323 homes pa - Housing Need Assessment Topic Paper para 3.18), especially with the removal of Tudeley Village (would have provided 840 affordable units) and reduction in housing numbers at Paddock Wood Document PS_054, Section 11 - by applying Government's standard method, objectively assessed housing need (OAHN) figure for TWBC is 667 dwellings pa, equating to a minimum of 12,006 dwellings over plan period (to 2038). 5,495 units need to be provided on allocated sites to meet this requirement . However, as confirmed at Appendix C (PS_054, Table 4), the SLP is now proposing to allocate sites providing only 4,595 dwellings (upper limit). Puts risk to delivering OAHN - unsound and non-compliant with National Policy NPPF para 60 - in order to support Government's objective of significantly 	<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> <p>The standard method has been used to calculate the housing need for the borough, the calculations have been set out on the Development strategy Topic Paper Addendum (PS_054). 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. 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.</p> <p>The SHELAA site assessment sheet for site 143 Land at Tolhurst Road, Five Oak Green acknowledges the Low harm Green Belt rating</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							boosting housing supply sufficient amount/variety of land can come forward where needed; and NPPF para 70 - identifies that small/medium sized sites can make an important contribution and are often built-out relatively quickly. SHELAA Site 143 – Tolhurst Road, FOG is available and could be delivered quickly as a small site allocation in the Local Plan.	and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (Core Document 3.77) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in determining site allocations to be included in the new Local Plan.
162-1	Nichola Watters	Wealden District Council			1 Introduction		Introduction -legally compliant/sound: Wealden District Council (WDC) notes all the proposed changes to the Tunbridge Wells Local Plan development strategy in response to the Inspector's initial findings (including an immediate review), and confirms the Plan to be both legally compliant and sound.	This is noted.
164-1	Bartholomew Wren	Tonbridge and mall Borough Council			12 Conclusions on preferred development strategy option	TMBC does not propose any modifications.	<p>Consider Plan is legally compliant and sound and raises the following;</p> <p>TMBC support the conclusions now reached on the preferred development strategy option to reduce scale of growth east of Paddock Wood and to delete Tudeley Garden Village.</p> <p>Acknowledge commitment to review plan within 5 years of adoption.</p> <p>Proposed changes address concerns previously raised by TMBC regarding potential cross-boundary impacts in particular on Tonbridge, Hadlow, Golden Green and East Peckham.</p> <p>However still concerns around cross-boundary traffic impacts on the A228 north of PW and the B2017 west of PW and no highway</p>	<p>This is noted.</p> <p>Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed including the A228 and B2017. Whilst the additional growth will still increase traffic numbers the level is such that no highway infrastructure improvements are required in T&M. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>infrastructure improvements are planned within T&M to support the level of growth. Additional dwellings at PW will still add to demand upon local roads north and west of PW and surrounding areas which will need to be considered through the T&M Local Plan.</p> <p>Notes the proposed bus improvements, but success will be dependent on delivering meaningful bus priority measures to ensure services are reliable and kerb and passenger facilities improved.</p>	
168-2		Castle Hill Developments Ltd	Douglas Bond	Woolf Bond Planning	Appendix C: Proposed changes to the Strategic Policies	<p>Consequently, the last paragraph of the policy should be amended as follows: “Following adoption, the Council will undertake an <u>immediate early review of the Local Plan commencing with the preparation of a new Local Development Scheme (or other document of equivalent status) within 6 months of the Plan’s adoption</u>, which will include further investigation of ways of meeting identified housing needs for the period post 2034. <u>A new Local Plan meeting the identified housing needs post 2034 will be submitted for examination within 2 years of the Plan’s adoption.</u>”</p>	<p>Requests an immediate review, within a year of adoption, of the Local Plan due to not having a full 15-year plan period.</p> <p>The Green Belt assessment the Council undertook in response to the Inspector’s Initial Findings did not include one of the largest land parcels on the northern edge of Royal Tunbridge Wells which includes the Castle Hill proposal. Appears the more stage 3 study addendum has been confined to the original scope of the Sustainability Appraisal as opposed to a more objective assessment of the Green Belt within the borough as a whole. The assessment should have been to identify the least performing Green Belt and then ascertain if it represented an acceptable and sustainable development parcel. Not including land on the edge of the borough’s principal settlement in this assessment is wrong.</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 timing of a Local Plan review is likely to be discussed at the future hearing sessions. TWBC feels that 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]. It will, in the meantime enable the Council to progress to adopt the Local Plan, albeit with a 10 year housing land supply, which will allow plan-led development for the next 10 years and sustainably boosting housing delivery, and provide more rather than less certainty. This is considered a sensible approach given the Government is wanting Local Authorities to progress and get Local Plans adopted.</p> <p>Regarding Green Belt, The Green Belt Stage 3 Addendum (PS 035) explains at Chapter 2 what is considered to be a reasonable alternative site to be assessed through the Green Belt Stage 3 Addendum work, and the site assessment methodology. The Council considers that all reasonable alternative sites have been</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								appropriately identified and robustly assessed by the Green Belt Stage 3 Addendum.
170-1		Rydon Homes	David Neame	Neame Sutton	14 Commitment to early review	<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 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 	<p>Commitment to early review - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> • TWBC's main modification to Policy STR1 seeks to reduce the plan period down to 10 years from the date of adoption (end of 2024) and proposes an early review immediately following adoption (reason - by deleting Tudeley and reducing the size of allocation at Paddock Wood, the Plan will be deficient by at least 1,073 dwellings over the full Plan period to 2038). However, NPPF Para 22 and Planning Policy Guidance confirm strategic policies should look ahead over a minimum 15 year period. In not planning for the full period, TWBC has failed its legal obligation to prepare/maintain an up-to-date Development Plan. It consequently fails the tests of soundness in respect of being effective/positively prepared/justified/consistent with National Policy • Rather than tackling issue of significantly boosting housing supply and allocating further sites to meet the shortfall, TWBC proposes a 'sticking plaster', reducing the Plan period followed by an early review - will result in significant delay in the delivery of much needed homes across the borough. 	<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> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p>

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						<p>within the Technical Note prepared by Liz Lake Associates;</p> <p>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 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>		
172-1		Rydon Homes	David Neame	Neame Sutton	14 Commitment to early review	<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>Commitment to early review - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> TWBC's main modification to Policy STR1 seeks to reduce the plan period down to 10 years from the date of adoption (end of 2024) and proposes an early review immediately following adoption (reason - by deleting Tudeley and reducing the size of allocation at Paddock Wood, the Plan will be 	<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</p>

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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; and, 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 	<p>deficient by at least 1,073 dwellings over the full Plan period to 2038). However, NPPF Para 22 and Planning Policy Guidance confirm strategic policies should look ahead over a minimum 15 year period. In not planning for the full period, TWBC has failed its legal obligation to prepare/maintain an up-to-date Development Plan. It consequently fails the tests of soundness in respect of being effective/positively prepared/justified/consistent with National Policy</p> <ul style="list-style-type: none"> • Rather than tackling issue of significantly boosting housing supply and allocating further sites to meet the shortfall, TWBC proposes a 'sticking plaster', reducing the Plan period followed by an early review - will result in significant delay in the delivery of much needed homes across the borough. 	<p>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> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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						make a valuable contribution towards meeting the minimum LHN over the whole Plan period and in particular Rydon Homes' promotion site at Angleley Lane, Sissinghurst.		
188-1		Lamberhurst Winery		Future Planning and Development	12 Conclusions on preferred development strategy option	<p>In order to deliver the homes required by the Local Plan consideration should be given to the allocation of Lamberhurst Vineyard (SHELAA site reference 423) for housing. The site lies within the context of the existing built development of Lamberhurst Down; infilling an area bounded by the existing housing along Furnace Lane, Town Hill and the existing commercial and residential buildings within the Lamberhurst Vineyard site, thus minimising the impact of built development on the wider area. This site is being brought forward by a SME developer and is proposed to be delivered as soon as possible following the grant of planning permission.</p> <p>Policy PSTR/LA 1 should be modified to include the</p>	<p>Development strategy - not legally compliant and unsound</p> <p>Consider the Council's preferred option on modifications to the plan to be unsound, particularly with regard to housing supply. The Council has refused to accommodate the loss of Tudeley by refusing to provide a more even distribution of allocated sites across the Borough, which would support and enhance existing communities, and would ensure a more successful delivery of homes.</p> <p>The Inspector cannot give any significant weight to the proposal for an early review as there is no mechanism by which it could be enforced. For example, Wealden DC adopted a Core Strategy Local Plan in 2013, which stated the housing provision would be reviewed in 2015. Nine years later, Wealden DC have still not managed to adopt an up-to-date plan that meets the district's housing needs.</p> <p>Adopting a plan which does not meet the needs is not a sustainable approach to plan making.</p> <p>Small and medium sized sites, usually brought forward by SME developers rather than volume housebuilders, should play an important role in</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> <p>Site 423 has previously been assessed through the SHELAA process and found to be unsuitable as a potential allocation.</p> <p>It should be noted that a small part of site 423 has been promoted through a planning application. This is application reference 22/0304 which sought consent for the erection of 7 affordable dwellings, with associated access, parking, landscaping and a pedestrian link path to Town Hill (resubmission of 21/02810/FULL). It was refused 20 April 2023 [Officer note: It had been recommended for approval by officers but was</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR 1 The Development Strategy

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						allocation of around 125 dwellings at Lamberhurst Vineyard (SHELAA site reference 423) and an additional allocation policy should be included (AL/LA 2) for the allocation of this site.	<p>delivering housing, but the proposed strategy promotes the opposite of this.</p> <p>Policy PSTR/LA 1 is unsound as it follows Policy STR 1 in failing to deliver enough housing across the Borough. PSTR/LA 1 should be modified to include the allocation of around 125 dwellings at Lamberhurst Vineyard, and an additional policy (AL/LA 2) should be included for the sites allocation.</p>	refused by Planning Committee on 12 April 2023]. An appeal has been lodged (Appeal reference APP/M2270/W/23/3328013) and an appeal decision is pending.