

Planning Policy  
Tunbridge Wells Borough Council  
Royal Tunbridge Wells  
Kent  
TN1 1RS

**Reading**  
3rd Floor, Suite 3  
Apex Plaza  
3 Forbury Road  
Reading RG1 1AX

[nexusplanning.co.uk](https://www.nexusplanning.co.uk)

23 October 2024

Dear Sir/Madam

### **Consultation on the New Evidence Base Documents informing Tunbridge Wells Borough Council's Emerging Local Plan**

These representations have been prepared by Nexus Planning on behalf of the Diocese of Rochester in response to the Tunbridge Wells Borough Council's ('the Council') consultation on the new evidence base documents informing the emerging Local Plan.

The Diocese of Rochester has an interest in all strategic and non-strategic matters informing the preparation of the emerging Local Plan.

The Diocese of Rochester are looking to explore the scope to bring forward a scheme for residential/older living at The Vicarage, Paddock Wood ('the site').

#### **The Site and Surrounding Area**

The site is approximately 0.3 ha in size and comprises a residential dwelling set towards the centre of a large plot, with access is granted to the west of the site off Maidstone Road. Its boundaries on all sides comprise mature trees and hedgerow, and a garden/planted area forms the remaining area of the site.

Residential development bounds the site to the east, south and west, and St Andrews Church is located adjacent to its northern boundary.

In terms of designations, the site:

- Is within the Built Area;
- Is within Flood Zone 1;
- Is subject to low surface water flood risk; and
- Does not contain any historic assets however there are three Grade II Listed buildings located within 150m.

Paddock Wood is designated as a Town Centre within the Submission Local Plan (October 2021). The site is sustainably located and within close proximity to a wide range of services including a convenience store (within 300m), restaurants (within 300m), a community centre (within 50m), a doctors surgery (within 500m), a nursery (within 500m), a primary school (within 500m), and a secondary school (within 1,000m). In addition, there's a wide array of employment opportunities located 1,300m to the north of the site associated with Paddock Wood's Economic Development Area.

The site benefits from good access to public transport provision. There are two bus stops located directly adjacent to the site, providing regular services to destinations including Yalding, East Peckham, Tunbridge Wells and Tonbridge. Moreover, there is a railway station located within 700m of the site, providing services to Tonbridge, Ashford and London.

Based off the above, it is considered that the site relatively free of constraints and located within a highly sustainable location, making it a suitable location for development. A sketch site test plan (**Appendix 1**) has been prepared in support of this representation to demonstrate how a later living scheme could come forward within the site in a suitable and developable manner.

### **New Evidence Base Documents – Housing Requirement**

The 'Local Plan Examination Note for Inspector in response to Action Point 30 regarding the Local Plan and Five-Year Housing Land Supply Position's confirms that using the projected household growth between 2024-2034, the revised local housing need figure is 660 dwellings per annum (capped), amounting to some 11,880 homes over the plan period to 2038. The proposed Modifications to the Submission Local Plan (October 2021) seek to reflect these figures, consequently reducing the housing need figure by 18 dwellings per year (from 678), equating to a reduction of 320 dwellings over the plan period (from 12,200).

Whilst the overall housing requirement is proposed to be reduced, the Diocese of Rochester supports the Council in maintaining its windfall allowance for large urban sites at 360 dwellings and seeking to increase its windfall allowance for small sites from 1,310 to 1,464 dwellings.

Paragraph 4.16 of the Submission Local Plan confirms that further details of both already identified sites and windfall sites are set out in the Housing Supply and Trajectory Topic Paper and the Brownfield Land Topic Paper. The Diocese of Rochester would like to take this opportunity to confirm that the site is indeed suitable, available and deliverable for development and should be accounted for by the Council within its windfall housing trajectory.

The Diocese of Rochester notes that the Labour Government launched a consultation of proposed revisions to the National Planning Policy Framework which ran until 24<sup>th</sup> September 2024. The revisions form part of the Governments approach to Planning Reform to bolster both housing numbers and alongside this consultation, the Government has published revisions to the Standard Method for calculating housing need. If confirmed, the Council's housing numbers will increase to a greater number than currently planned for. The Diocese of Rochester urges the Council to support housing numbers through directing residential development to sustainable locations within the urban area, including locations such as the site.

### **New Evidence Base Documents – Later Living Accommodation**

Closely linked to the Council's housing requirement, there is a clear and existing need for later living accommodation as set out within Submission Local Plan. This states that based on 2018 (ONS) population projections of the increase in residents over 75 years of age, this would equate to some 431 extra care home dwellings in the borough by 2038, an increase of some 267 dwellings above the current stock (of 164 units).

The Submission Local Plan confirms that these needs will be addressed through a combination of site allocation policies and planning permissions on suitable sites. The site is considered to be suitable, achievable and available, and should it be brought forward as a retirement living development, it would support the Council's objective.

### Conclusion

In reviewing the new evidence base documents informing the emerging Local Plan, the Diocese of Rochester urges the Council to support development within sustainable locations within the urban area. There is a clear and evident need for both residential and retirement living accommodation within Tunbridge Wells, and the Council should look to adopt a positive approach in addressing this need through supporting suitable, achievable and available sites within the urban area.

If you have any questions, please do not hesitate to contact myself.

Yours sincerely

**Peter Tooher**

Executive Director

[Redacted signature]

# Appendix 1 – Sketch Site Test

St Andrew's Church

21.6m

Later Living

El Sub Sta

MAIDSTONE ROAD

