

Public Consultation on Tunbridge Wells Borough Council’s Local Plan: New Evidence Base Documents – summary and response table for comments on Housing Needs and Supply (PS_107)

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
NEBD6-2		Castle Hill Developments Ltd	Mr Douglas Bond	Woolf Bond Planning LTD	PS_107	As indicated in the accompanying statement, that consistent with the Main Modifications previously consulted upon, that the Borough’s housing requirement is kept at a minimum of 667 dwellings annually.	<p>Legally compliant but unsound</p> <p>Disputes the change in the housing requirements as it results in inconsistency between the assessment of housing need (based upon the 2024 position) and the evidence on the supply which is based on that known at 1st April 2023. It is essential a consistent date is used.</p> <p>Given the information on the various sources of supply are related to the position from 1st April 2023, this should also be the starting point for assessing local housing need arising from the average change in household growth.</p> <p>Therefore, the Borough’s housing need should be maintained at 667 dwellings annually.</p> <p>Ensuring consistency in the data on sources of supply with the derivation of the requirement also reflects the conclusions of Inspector’s undertaking the examinations of other Local Plans, including that of the neighbouring Maidstone Borough as indicated in paragraph 51 of the Inspector’s letter on the Maidstone Local Plan (March 2024).</p>	As agreed with the Inspector at the relevant Stage 3 hearing session (Matter 8, Issues 1 and 2) held on the 20 June 2024, the Council considers it appropriate to use the most up-to-date Standard Method calculation of housing need (as at 1 April 2024) in accordance with the PPG (link). This also takes account of the most up-to-date affordability ratios. Whilst not yet published, the Council also now has an up-to-date Local Plan housing trajectory with supply data as at 1 April 2024 which retains a 10-year supply of housing post-adoption of the Local Plan.	Yes, I wish to participate at the examination hearing session - As explained in the accompanying statement, it is important to appear given the importance of addressing the issues regarding the review of the plan, as previously stated through the contributions at earlier sessions.
NEBD9-8		Redrow and Persimmon	Judith Ashton	Judith Ashton Associates	PS_107		<p>Legal compliance and soundness not stated</p> <p>Supports the housing trajectory set out in PS_107 for the Persimmon and Redrow sites at PWeC.</p>	This is noted.	Not stated.
NEBD11-1	Mr Jay Ali				PS_107		<p>Unsound, legal compliance not stated</p> <p>The Local Plan is unsound as it does not meet current housing targets, nor those proposed by the new Labour government.</p> <p>Tunbridge Wells house prices are sky high due to a lack of supply. The lack of affordability will lead to brain drain, alongside causing young people and young families to move away, causing further issues in supporting the elderly.</p> <p>Areas need to be set aside for housing, such as Stone Court Farm at the periphery of Pembury, which would utilise local infrastructure and transport connections. The adjacent woodlands could become a local green space.</p>	<p>The Local Plan housing trajectory will meet the Council’s identified 10-year supply period post-adoption of the Local Plan as evidence within its 1 April 2023 trajectory (as well as within its as yet unpublished 1 April 2024 position). To meet the housing needs to the end of the plan period, the Council commits to an early review of the Plan post-adoption.</p> <p>The proposed new housing targets under the new government are not formal policy at this stage. The governments consultation on the NPPF did also introduce proposed transitional arrangements and the</p>	Yes, I wish to participate at the examination hearing session because not enough far sightedness is being displayed, and a lot of local public finances will be in difficulties.

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								Plan would (if formally introduced) be subject to transitional these arrangements; as above, the Council would commit to an early review of the Plan post-adoption that would have regard to any changes in housing need calculations. At that stage, the Council would also consider new site allocations through a Call for Sites process to meet the required housing needs.	
NEBD16-1		Tunbridge Wells Green Party	John Hurst		PS_107	Please see our comments to PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy (September 2024).pdf <i>[TWBC: Please see the referenced comment NEBD16-4 in table 11) Comments outside the scope of the consultation]</i>	Legally compliant but unsound TW Green Party welcomes the reduction of the buffer from 1050 to ~200-300. This is in-line with our proposal in our Stage 2 Hearing Statement (Matter 3, Issue 1). Appendix 1: are the dates shown for the housing development firm? A surprising number are timed for after 2030.	This is noted, though the Council is committed to an early Local Plan review to seek additional housing sites. The phasing of all extant permissions and site allocations are based on the most up-to-date available information as well as historic phasing and built-out rate data for the borough. The trajectory is reviewed periodically to ensure that all sites remain deliverable and/or developable within the Plan period.	No.
NEBD19-2		B.Yond Strategic Ltd	David Neame	Neame Sutton	PS_107		Legally non-compliant and unsound <i>[TWBC: comments to be read in conjunction with those in the table for PS_109 – Revised wording for Policy STR 1]</i> The Correct Local Housing Need (LHN) Calculation: <ul style="list-style-type: none">The Council has now accepted that 660 dpa is the correct approach. The Need for a 5% Buffer: <ul style="list-style-type: none">The Council also now accepts that its housing trajectory and 5-year housing land supply calculation must include a 5% buffer in accordance with the 2019 version of the Framework against which the Plan is being examined. What is the 5-Year Period to be Considered at Adoption?	This is noted. This is noted. This is noted.	Not stated.

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							<ul style="list-style-type: none">The Council has confirmed that the 5-year period should be based at 01 April 2025, which B.Yond agrees is the right approach to take.It is therefore necessary for the Inspector to be satisfied that the Plan will be capable of demonstrating a 5-year housing land supply of deliverable housing sites at the point of adoption being to 01 April 2025 base date.This base date is also important in considering other matters, e.g. delivery timetables set out in the IDP.The Council's proposed modifications to Table 3 of the Plan do not correctly reflect the new base date of 01 April 2024 and instead work from the old date of 01 April 2023. The data in Table 3 is therefore incorrect and should be amended to reflect the up-to-date position. <p>When should the Council’s 10 Year Plan Period commence from?</p> <ul style="list-style-type: none">The Council sets out an updated housing delivery trajectory (PS 107 also known as <i>TWLP/153</i>) that clearly marks the years 1-18 for the overall Plan period. Year 1 commences in 2020/21, which is reflected in the revised wording to Policy STR1. The Council's housing delivery trajectory therefore works on the basis that the 10 year period runs from 2020 – 2030 i.e. there will only be 5 years of the period left at the proposed point of adoption.In effect at the point of adoption the Plan will only have 5-years worth of planned housing growth left which is high risk not supported by the National policy. <p>Does the Plan Demonstrate a 5-year Housing Land Supply at 01 April 2025?</p> <ul style="list-style-type: none">Neame Sutton's analysis indicates that the Council has not addressed major concerns regarding the housing delivery data. Discrepancies between the IDP and proposed delivery at Paddock Wood suggest that the Council cannot demonstrate a 5-year housing land supply at 01 April 2025, which is problematic given the Plan's limited remaining 5-year supply.	<p>The Council has recently completed its monitoring of housing supply (extant permissions and completions data) as at 1 April 2024; given the current stage of the examination, it is not currently proposed to amend the housing figures within the Local Plan to reflect the 1 April 2024 position (noting that the Local Plan trajectory is a live document). The Council can nonetheless demonstrate, taking into account the supply position as at 1 April 2024, that there remains a 10-year supply post-adoption (from 1 April 2024) with a rolling five-year housing land supply (with 5% buffer).</p> <p>The Council's proposed strategy is a 10-year supply period post-adoption (i.e., from 1 April 2025 – 31 March 2035) which takes account of completions and supply from 1 April 2020 – 31 March 2035.</p>	

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							<ul style="list-style-type: none">The detailed housing delivery trajectories attached at Appendix 1 to these Representations set out the reasons why the Council cannot meet the Annex 2 deliverability test.		
NEBD20-6		Save Capel			PS_107		<p>Unsound, legal compliance not stated</p> <p>Background</p> <ul style="list-style-type: none">Revised trajectory is based on revised housing required being reduced to 660 dpa.Save Capel (SC) considers that the trajectory remains very front-loaded, and it would have been helpful if the Council had provided an updated position of actual completions in 2023/24 as part of this consultation, including a breakdown of lapsed permissions.The revised SLP will result in a shortfall of approx. <u>1,000 dwellings</u> or 8.9% of overall need to the end of the plan period, and therefore there is a commitment to an early review. <p><u>Five-Year Housing Land Supply Positions</u></p> <ul style="list-style-type: none">Concerns regarding the five-year position, which is 5.42 years with a 5% buffer, or 3,689 dwellings within the first five year post-adoption, coming from different sources of supply:<ul style="list-style-type: none">Extant Permissions (1,193 dwellings) as lapsed permissions have not been considered,Windfall sites (608 dwellings),Strategic allocation (800 dwellings),Other allocations (1,088 dwellings)Given concerns about the deliverability of those sources, the 287 dwelling buffer (Table 1 of PS_107) is therefore questionable.Also question the evidence to demonstrate of a rolling five-year housing land supply through to 1st April 2030 (which would cover to the end of the 10-year supply period to 31 March 2035). <p><u>Ten-Year Housing Land Supply</u></p> <ul style="list-style-type: none">SC does not share the confidence that a “10-year housing land supply can be	<p>The Council has recently completed its monitoring of housing supply (extant permissions and completions data) as at 1 April 2024; given the current stage of the examination, it is not currently proposed to amend the housing figures within the Local Plan to reflect the 1 April 2024 position (noting that the Local Plan trajectory is a live document). The Council can nonetheless demonstrate, taking into account the supply position as at 1 April 2024, that there remains a 10-year supply post-adoption (from 1 April 2024) with a rolling five-year housing land supply (with 5% buffer).</p> <p>There is no requirement in National Planning Policy to have regard to previously lapsed permissions.</p> <p>All identified supply within the first five-years post-adoption are deemed to meet the tests of deliverability as required within National Planning Policy.</p> <p>As above. A rolling five-year supply can be achieved to the end</p>	<p>Yes, I wish to participate at the examination hearing session - SC intends to continue to participate fully in any remaining stages of the Local Plan’s review and will seek to make formal representations in any future hearings during which the issues raised in this representation are discussed.</p>

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							<p>achieved post-adoption”, given a buffer of 200 dwellings in 2035 (10,100 – 9,900 as above para 8.2), or only 2% of the anticipated supply. In any context this buffer is not adequate justification that supports the policy in STR 1 - para 4 stating “<i>Includes a buffer to allow for potential delays or non-delivery of sites</i>”.</p> <ul style="list-style-type: none">The uncertainties referred to above regarding extant permissions, windfalls, and ‘other’ allocations demonstrate a significant risk of not achieving the revised strategy and a 10-year housing land supply on adoption remains highly questionable. <p><u>Distribution of Housing Allocations</u></p> <ul style="list-style-type: none">SC is increasingly concerned that Capel’s rural identity is being overlooked and there is a total disregard for the parish, for example, in Table 4 Distribution of housing allocations (PS_107) Capel remains struck out.It also unclear what the (*) references in Table 4 to Appendix 2 relate to as there is nothing in the policy wording to explain the references.	<p>of the 10-year supply period post-adoption, and the Council nonetheless commits to an early review of the Local Plan to identify further sites to meet the identified housing needs to the end of the Plan period. There is no specified buffer requirement for Plan periods within National Planning Policy.</p> <p>As above, the Council remains confident that a 10-year supply of housing will be achieved post-adoption of the Local Plan that also has regard to any shortfalls (or surpluses) in completions prior to 1 April 2025.</p> <p>The Council proposes a modification to Table 4 to specify the approximate number of houses expected to be delivered within East Capel.</p> <p>These references are within the proposed modifications to Table 4. In short, they relate to the figure for Capel parish (to note that this includes that part of the urban expansion extending from Paddock Wood into the eastern edge of the parish and is based on the strategic sites and master planning development density ranges) as well as the allocation capacities for Benenden parish reflecting those capacities within the ‘made’ Benenden Neighbourhood Development Plan.</p>	
NEBD29-1		Bellway Strategic Land	David Murray-Cox	Turley	PS_107	N/A	<p>Legal compliance and soundness not stated</p> <p>Document PS_107 Note for Inspector to Action Point 30 Housing Land Supply Positions (June 2024):</p> <ul style="list-style-type: none">Document envisages 10,983 dwellings would be completed between 2020/21 – 2037/38, falling short of the cumulative housing requirement. The shortfall of approximately 1,000 dwellings (equal to 19.7% of need from allocated sites and	<p>The Council will seek to meet the full housing and other needs to the end of the Plan period as part of its immediate review post-adoption of the Plan. While the buffer above the cumulative requirement is relatively small, a rolling five-year supply can be achieved to the end of the 10-year supply period post-adoption and there is no specified buffer requirement for Plan periods within National Planning Policy.</p>	Not stated.

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							<p>8.9% of overall need to end of plan period) is noted. Evident that the overall shortfall has increased by 5 % points.</p> <ul style="list-style-type: none"> Council confident a 10-year housing land supply can be achieved post-adoption. (even based on the trajectory at Appendix 1 of document TWLP/153). However, it is clear that cumulative completions are only ever marginally above the cumulative requirement. Critical that any future Local Plan review undertaken by TWBC is not just to remedy the issues with the submitted Plan but ensures sufficient housing and land provision for development in general. 		
NEBD31-1	Mr Adrian Thorne	Residents Against Ramslye Development			PS_107	We believe these green belt developments (inc AL/RTW16) should now only be considered after the 5 year review has taken place and the council is able to take account of the new policy that is coming in from a new government, giving the council the opportunity to make the case against NPPF requirement 144b. Non-green belt land being used in the earlier part of the plan which will not impact upon delivering housing supply.	<p>Unsound, legal compliance not stated</p> <p>Believe the change to incorporate an early review raises questions to the sustainability of the plan regarding Green Belt land. The NPPF requires Green Belt land to be protected unless there are exceptional circumstances. The plan can use the proposed review to strengthen protection for Green Belt areas.</p>	<p>The Plan is currently assessed against the 2021 NPPF, which sets out the relevant transitional arrangements against which the Submission Local Plan is being examined; the early review of the Local Plan will therefore have regard to any changes in National Planning Policy (including but not limited to any changes in Green Belt Policy).</p> <p>In terms of the development strategy and the development of Green Belt sites, Green Belt has been considered at previous Stage 2 and 3 Hearing Sessions. Specifically, this has been examined by Matter 3, Issue 4 (Stage 2 Hearing Session held 26 May 2022), Matter 4, Issues 1-3 (Stage 2 Hearing Session held 27 May 2022) and by Matter 1, Issue 1 the Hearing Session for which was held on the 18 June 2024 (under Stage 3).</p>	No, I do not wish to participate at the examination hearing session.
NEBD33-1		Diocese of Rochester	Peter Tooher	Nexus Planning	PS_107	The Diocese of Rochester are looking to explore the scope to bring forward a scheme for residential/later living at The Vicarage, Paddock Wood ('the site') which is approximately 0.3 ha in size and comprises a residential dwelling	<p>Legal compliance and soundness not stated</p> <p>The Diocese of Rochester are looking to explore the scope to bring forward a scheme for residential/later living at The Vicarage, Paddock Wood ('the site') which is approximately 0.3 ha in size and comprises a residential dwelling with</p>	Any potential new site submissions shall be considered as part of the early review of the Local Plan post-adoption. An early stage in the Local Plan review process will be a 'Call for Sites'.	Not stated.

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						<p>with access is granted to the west of the site off Maidstone Road.</p> <p>The site is considered relatively free of constraints and located within a highly sustainable location. A sketch site test plan (Appendix 1) has been prepared in support of this representation.</p> <p><i>[TWBC: see details in next column – Comment Summary]</i></p>	<p>access is granted to the west of the site off Maidstone Road.</p> <p>The site is considered relatively free of constraints and located within a highly sustainable location. A sketch site test plan (Appendix 1) has been prepared in support of this representation.</p> <p>New Evidence Base Documents - Housing Requirement</p> <ul style="list-style-type: none">• 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 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.• The Diocese of Rochester would like 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 Labour Government launched a consultation of proposed revisions to the NPPF including 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. <p>Given the clear and evident need required for both residential and retirement living accommodation within Tunbridge Wells, it is suggested the Council looking to adopt a positive approach in addressing this through supporting suitable, achievable and available sites within the urban area.</p>	<p>Alternatively, the site could be promoted through the Development Management process, and if successful would make a contribution as a windfall site (assuming it would be proposed for residential use).</p> <p>At this advanced stage of the Examination, the Council does not seek to allocate further sites. This has been addressed by the Stage 3 Hearing Session held on the 18 June 2024, which considered Matter 1, Issue 3 (the proposed strategy and early review).</p> <p>The recent NPPF/Standard Method consultation is not currently formal government policy, although TWBC accepts it is a clear indication of the direction of travel. The Development Strategy Topic Paper (PS 3.126) and its Addendum (PS 054) sets out how the developments strategy has been developed. The development strategy has previously been considered at Stage 2 and Stage 3 (Matters 3, Issues 1 and 2 held on 26 May 2022 and Matter 4, Issue 3 held 18 June 2024 respectively).</p> <p>The Council will have regard to any change to housing need calculations as part of its early review post-adoption.</p>	

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NEBD42-8	Carol Williams	Paddock Wood Town Council	Troy Hayes	Troy Planning + Design	PS_107		<p>Legally non-compliant and unsound</p> <p>Updated housing trajectory is unrealistic for Paddock Wood.</p> <p>The parcel references should align with those included in the revised Policy STR/SS 1.</p> <p>There is no read across between the trajectory and IDP in terms of what the trigger points are for the delivery of infrastructure required for each parcel based on the amount of development delivered.</p> <p>Unclear how figures in Table 4 for Paddock Wood as a Strategic Urban Extension tally with figures elsewhere in Local Plan such as Policy STR/SS 1, which allocates the site for 2,450 dwellings.</p> <p>Development Lead in Times Trajectory is unrealistic in terms of when it assumes that housing delivery will commence. The latest Lichfields ‘Start to Finish’ report (September 2024) indicates that for sites of 2,000+ dwellings it takes between 4 and 7.9 years from validation of the first planning application to first dwelling being delivered. In terms of the average time from gaining outline planning permission to completion of first dwelling the updated report indicates on average around 3 to 4.6 years.</p> <p>Seek clarification on TWBC’s assumptions about each parcel (and for each developer within the parcels) in terms of:</p> <ul style="list-style-type: none">- When each masterplan will be prepared and approved- When pre-application process will take place- When will outline/full/reserved matters applications be submitted and approved- When the S106 for each parcel is be expected to be agreed- When will pre-commencement conditions be agreed by TWBC- What are the assumptions for opening up wors required for each site and combined- What infrastructure is required to be funded/delivered prior to commencement of each parcel- What is the planning approval process/timing for off-site infrastructure <p>TWBC need to answer the above so realistic housing trajectory can be prepared.</p>	<p>The housing trajectory for Paddock Wood is based on the most up-to-date available information, including continuous dialogue with all Paddock Wood site promoters regarding phasing and build-out rate assumptions.</p> <p>The IDP is set out in short medium and long-term timeframes which is common in most IDPs that support Local Plans. The council proposes to convene an infrastructure delivery board that will have developers, town and parish councils reviewing housing and infrastructure delivery that will enable a more detailed timeline to be produced.</p> <p>It is noted that Table 4 includes all development proposed within Paddock Wood (including STR/SS1, STR/SS2 and AL/PW1). A modification is nonetheless proposed to Table 4 to separate Capel and Paddock Wood parish figures.</p>	<p>Yes, I wish to participate at the examination hearing session - The Town Council wishes to participate in any future Hearings on the Local Plan given the scale of growth still proposed at Paddock Wood and given the well-known constraints and complexities of the area as twell as the Local Plan, masterplanning, infrastructure delivery and funding uncertainties that still remain.</p>

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							<p>Housing Delivery Rates Question delivery rates based on amount of infrastructure required at each phase which remains unclear. Also, question how funding for infrastructure will work – are developers going to forward fund infrastructure cost.</p> <p>For schemes of 2,000+ dwellings the updated Lichfields report indicates build out rates of 100 to 188dpa using the lower and upper quartiles of their analysis. The assumptions made in the revised trajectory are unrealistic and will result in a housing shortfall in the first five years of the plan following adoption and over remainder of plan period.</p>	<p>Developer funding and infrastructure delivery will be based on set trigger points as set out in policy STR/SS1 wording. This will be timed to ensure that infrastructure is delivered at the right time.</p> <p>The housing trajectory for Paddock Wood is based on the most up-to-date available information, including continuous dialogue with all Paddock Wood site promoters regarding phasing and build-out rate assumptions.</p>	