

Paddock Wood Town Council

Matter 2 – Housing and Employment Needs (Policy STR1)

ISSUE 1 – Housing Needs and the Housing Requirement

Q1. What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the national Planning Practice Guidance ('the PPG')?

PWTC Response:

1. No Comment

Q2. Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?

PWTC Response:

2. No Comment

Q3. In addition to the local housing need figure for Tunbridge Wells, should the Plan also make provision for housing needs that cannot be met in neighbouring areas? If so, what should that figure be?

PWTC Response:

3. This is a matter that should have been clarified and agreed with absolute certainty well in advance of the Local Plan being submitted to the Secretary of State. As we have heard from TWBC in the Stage 1 Hearings this matter has not been resolved through the Duty to Cooperate and not properly tested in the Sustainability Appraisal.

Q4. Will the plan period look ahead over a minimum 15 year period from adoption, as required by paragraph 22 of the Framework?

PWTC Response:

4. We consider that regardless of how TWBC responds to this question that the Local Plan period is insufficient to deal with the complexity of the delivery of strategic development proposed through the introduction of a new settlement and strategic growth proposed at Paddock Wood. The revised NPPF in 2021 included important additional policy requiring that where a local authority is proposing larger scale developments such as new settlements or significant extensions to existing villages and towns as part of its strategy that the policies should be set within a vision that looks ahead at least 30 years to take into account the likely timescale for delivery:

“Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

NPPF Paragraph 22 (our emphasis)

5. Whilst the NPPF Transitional Arrangements for this policy may mean that the Tunbridge Wells Local Plan is not technically ‘caught’ by this policy (by approximately one month), we consider this to be irrelevant to the fact that the Local Plan has simply not dealt with the difficult delivery issues for the strategic growth it has included in its Local Plan including transport infrastructure, flood risk infrastructure, wastewater infrastructure or the phasing of the housing development itself. It is for these reasons that Government introduced this policy requiring that the Local Plan policies look ahead to at least a 30 year period.
6. TWBC’s proposed plan-period is ‘driving’ the Local Plan’s suggested delivery rates and phasing for the proposed strategic allocation at Paddock Wood and Tudeley which are entirely unrealistic. TWBC’s evidence¹ claims that the entirety of the proposals at Paddock Wood will be completed by 2036/37 and that delivery at Tudeley will extend beyond the plan period with 2,100 to be delivered by 2038 and 700 beyond the plan period.
7. Therefore, the plan period should be changed to 2020-2053. As a result of this change to the plan-period the majority of the Council’s evidence base will need to be reviewed and updated which presents the opportunity for TWBC to fulfil its

¹ CD3.74a-b Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan

Duty to Cooperate with its neighbouring authorities in the preparation of a new Local Plan and its supporting joint evidence base.

Q5. Do policies relating to the Green Belt and/or the High Weald AONB provide a strong reason for restricting the scale of development in Tunbridge Wells?

PWTC Response:

8. We consider that the existing extensive flood risk present in the borough and future impacts of climate change (particularly at Paddock Wood) should also be considered as a reason to restrict the scale of development in the borough to comply with the NPPF sections on 'Planning for Climate Change' and 'Planning and Flood Risk'.

Q6. Is the housing requirement justified, having particular regard to areas of Green Belt and AONB across Tunbridge Wells?

PWTC Response:

9. Please see our response to Question 5 which is also relevant here.

ISSUE 2 – Affordable Housing Needs

Q1. What is the annual net need for affordable housing? For clarity to decision-makers, developers and local communities, should the need for affordable housing be clearly set out in the Plan?

PWTC Response:

10. We consider that the annual net need for affordable housing should be set out in Plan and specifically it should be set out in Policy STR1 and the Strategic Site Policies at Paddock Wood to ensure the policies' effectiveness.

Q2. Has the need for affordable housing been accurately established and is it based on robust, up-to-date information?

PWTC Response:

11. No Comment.

Q3. How does the need for affordable housing compare to the housing requirement? Based on the thresholds and requirements in Policy H3, will affordable housing needs be met?

PWTC Response:

12. It is currently unclear how the need for affordable housing compares to the housing requirement as it does not set out the affordable housing need or target anywhere in the Local Plan as far as we can see.

13. The thresholds in Policy H3 are too complicated and are not clear to users of the Local Plan. For instance, in relation to "Overall Approach" it refers to "sites comprising mostly greenfield land". How does one measure 'mostly' and why have these thresholds have been selected?

14. There does not appear to be evidence by the Council which assesses the potential delivery of affordable housing based on applying these thresholds to the housing supply therefore it is not possible to determine whether the affordable housing needs will be met.

ISSUE 3 – Employment Needs

Q1. The PPG advises that strategic policy making authorities will need to develop an idea of future economic needs based on a range of data which is current and robust. This includes analysis of labour demand, labour supply, past take-up and from consultation with relevant organisations² Does the Council’s assessment of economic and employment needs reflect the methodology in the PPG?

PWTC Response:

15. No, the Council’s Economic Needs Study³ is dated August 2016 and is clearly the primary evidence base that the Council relies on for its Development Strategy in relation to employment land. This study is nearly six years old and clearly out of date.

16. The future employment needs and land requirements in Sevenoaks and Tunbridge Wells were assessed in the Economic Nedes Study (2016) using three approaches:

- Labour Demand – this was based on Oxford Economics’ 2014 East of England Forecasting Model (EEFM). **This modelling used is approximately 8 years old and clearly out of date.**
- Labour Supply – trend-based demographic projection from the 2015 SHMA. **This is approximately 7 years and out of date.**
- Past Take Up – this is based on past take-up of employment land and / or future property market requirements. **We assume this was based on past take up at the time of the Economic Needs Study in 2016 so things will have clearly moved on from then and should have been updated to take account of take up from 2016 – 2021.**

Q2. Are there any significant differences in the projections when using labour demand, labour supply and past take-up?

PWTC Response:

17. According to Table 1 of the Economic Needs Study there is not a significant net difference between the projections however there are significant differences when assessing Office and Industrial individually.

- Offices: there is a difference of 4.5 hectares between the projections (using 2013 – 2035).

² Paragraph: 027 Reference ID: 2a-027-20190220

³ CD 3.87

- Industrial: there is a difference of 6.9 hectares between the projections (using 2013-2035)
- Warehouse: there is a difference of 1.5 hectares between the projections (using 2013-2035)

Q3. What are the reasons for the projected decline in industrial uses over the plan period? Does this accurately reflect the local market?

PWTC Response:

18. It is not possible to rely on the projected decline based on a study that is so dated however it would appear that the projected decline in industrial uses is based on the EEFM Model as set out in Table 8.1 of the Study.

Q4. The *Sevenoaks and Tunbridge Wells Economic Needs Study*⁴ was produced in 2016. It is based on data which is 'current and robust', as advised by the PPG?

PWTC Response:

19. Clearly it is not a current and robust piece of evidence on which to base the future employment needs and policies of Tunbridge Wells borough.

Q5. What implications has the current Coronavirus pandemic ('COVID 19') had on the assumptions in the Economic Needs Study, especially around projections for office space? Or is it too early to predict any longer-term changes in employment needs and patterns?

PWTC Response:

20. As the Economic Needs Study is so far out of date, the commissioning of a new Economic Needs Study is required to also assess the impacts of the Coronavirus pandemic on the employment market.

⁴ CD 3.87

Q6. The projections in the Economic Needs Study cover the period between 2013 and 2035. How does this correlate with the plan period?

PWTC Response:

21. The Local Plan period starts in 2020 which is 7 years after the Study starting period. The Local plan period ends in 2038 which is 3 years after the Study period ends. In total this equates to a 10 year difference.

Q7. In contrast to the identified need for 14 hectares of land, the Plan allocates sites sufficient to provide around 26.5 hectares of new employment land. What is the justification for this?

PWTC Response:

22. It is unclear why the Council has proposed to allocate nearly double the amount of employment land that it said it would in Policy STR1. The Economic Development Topic Paper ⁵states:

“While this appears substantially more than the 14ha minimum requirement, it is nonetheless considered appropriate with particular regard to the following:

- *It is made up of just four sites, which is seen as a minimum in terms of offering choice of locations for new development;*
- *Over a half of the total developable area is on one site, which together with the existing Longfield Road/North Farm area, will be a strategic employment location well sited in relation to the A21, that will serve a wider, west Kent area;*
- *The need for employment land releases as integral elements of the strategic growth of Paddock Wood, as well as to support that at the proposed nearby Tudeley Village;*
- *The nature of the sites, with a range of suitable uses, may well not be developed at the densities assumed in the ENS, such that the actual floorspace created would be closer to that assumed in the ENS;*
- *The allocation of the site at Gills Green in Hawkhurst will provide expansion space at an existing, successful business area in the east of the borough.*

Hence, it is concluded that the proposed site allocations are justified and, in conjunction with policies that provide for the retention and enhancement of existing sites and areas, will support the sustainable growth of the borough as a whole.”

⁵ CD 3.84 Paragraphs 4.33 – 4.34

23. This reasoning by the Council is troubling as it signals a poorly conceived economic strategy for the following reasons:

- If the economic strategy relies on only four sites and the Council is concerned this does not offer sufficient choice to the market then perhaps the Council has selected inappropriate sites;
- If the Council is concerned that over half of the total developable area is on one site, then perhaps it is inappropriate to include in the Local Plan;
- If the employment sites are needed as integral parts of Paddock Wood and Tudeley Village and the employment sites do not deliver, does that mean that the overall strategy for both of these areas are built on unsustainable and weak foundations to deliver employment alongside housing bringing the development strategy into question?
- If the Council is concerned that the sites might not be developed at the densities assumed, should the Council not do more work to build more of its confidence in its own assumptions before including as allocations in a Local Plan?
- Providing expansion space in Hawkhurst is still providing additional employment land so why is this considered an exception in the mind of the Council?

Q8. What are the implications if all of the planned employment land is taken up? Will there be sufficient labour to fill local jobs, or, will it lead to commuting from elsewhere?

PWTC Response:

24. This important analysis does not appear to be undertaken by the Council to inform its policy formulation or decision making. Such a meaningful analysis is unlikely to have been possible due to out of date nature of the Economic Needs Study and the SHMA.

Q9. In determining the need for future employment land, how has the Council taken into account qualitative needs for different types of accommodation?

PWTC Response:

25. No Comment.