

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 9: Housing Land
Supply**
**Issue 2: Five Year Housing Land
Supply**

Document Reference: TWLP/039



Contents

Inspector's Question 1: [re. anticipated five-year housing land requirement].....	3
TWBC response to Question 1.....	3
Inspector's Question 2: [re. past delivery].....	5
TWBC response to Question 2.....	5
Inspector's Question 3: [re. expected housing supply post-adoption].....	6
TWBC response to Question 3.....	6
Inspector's Question 4: [re. housing trajectory evidence].....	8
TWBC response to Question 4.....	8
Inspector's Question 5: [re. clear evidence of deliverability].....	9
TWBC response to Question 5.....	9
Inspector's Question 6: [re. projected housing delivery for strategic sites].....	12
TWBC response to Question 6.....	12
Inspector's Question 7: [re. windfall allowance].....	17
TWBC response to Question 7.....	17
Inspector's Question 8: [re. five-year supply on adoption].....	18
TWBC response to Question 8.....	18
Inspector's Question 9: [re. flexibility for delays at larger sites].....	19
TWBC response to Question 9.....	19
Inspector's Question 10: [re. review mechanism].....	20
TWBC response to Question 10.....	20
Appendix 1: Updated Housing Trajectory – Update of Figure 9 of the Submission Local Plan (Housing Trajectory).....	23
Appendix 2: Updated Local Plan Housing Trajectory – Update of Table 9 of the Housing Supply and Trajectory Topic Paper.....	24
Appendix 3: Deliverability of sites without current full planning permission.....	28

Matter 9 – Housing Land Supply

Issue 2 – Five Year Housing Land Supply

Inspector's Question 1: [re. anticipated five-year housing land requirement]

Taking into account completions since the base date of the Plan, what will be the anticipated five-year housing land requirement upon adoption of the Plan?

TWBC response to Question 1

1. The Council's latest Local Development Scheme (LDS; October 2021 [[CD 3.143](#)]) expects adoption of the Local Plan to be in January 2023. However, given the extended examination programme, it is now more likely to be in March 2023. Therefore, for the purpose of responding to this Question, the anticipated five-year housing land supply position as at 1 April 2023 provides the basis for the Council's response. The Council will update the LDS in due course to reflect the change in the examination programme and any consequential changes because of that.
2. In essence, the position at April 2023 amounts to rolling forward the latest Five-Year Housing Land Supply Statement from 2020/2021, [[PS 020](#)] taking account of the most recent information. In effect, the Council has used the figures in the Updated Housing Trajectory, set out at Appendices 3 and 4 in response to Matter 9, Issue 1, Question 1.
3. This Updated Trajectory is reproduced in **Appendices 1 and 2** of this Hearing Statement. This anticipates that there will be 744 completions for the period 1 April 2021 to 31 March 2022, and 859 completions for the period 1 April 2022 to 31 March 2023. Hence, as at 1 April 2023 (post-adoption of the Local Plan), it is anticipated that there will be 2,291 completions since the base date of the Plan, including the completions (688) during 1 April 2020 to 31 March 2021.
4. In calculating the five-year housing supply, these completions are deducted from the overall housing requirement and the residual requirement is divide by the number of years that would remaining (i.e. 15). Hence, the maths is:

12,204 dwellings minus 2,291 dwellings = 9,913 divided by 15 years = 661 dwellings pa

5. In applying the 5% buffer in accordance with the NPPF, the Council anticipates a total five-year housing land supply requirement of **3,470 dwellings** over the period of 1 April 2023 to 31 March 2028. This equates to **694 dwellings per annum** (inclusive of a 5% buffer).

Inspector’s Question 2: [re. past delivery]

How does the five-year housing land requirement compare to previous rates of delivery in Tunbridge Wells?

TWBC response to Question 2

6. The anticipated five-year housing land requirement at adoption, including a 5% buffer, is 694 dwelling per annum (pa), as stated in response to Question 1 above. This is compared to actual housing delivery over the last 15 years – see Table 2 below, taken from the Council’s latest Authority Monitoring Report [[PS 018](#)].

Table 1 - Reproduced Table 19 of Latest Authority Monitoring Report (Net Additional Dwellings Complete by Monitoring Year)

Year	Total Net Completions
2006/2007	517
2007/2008	517
2008/2009	411
2009/2010	104
2010/2011	315
2011/2012	212
2012/2013	-5
2013/2014	-16
2014/2015	323
2015/2016	447
2016/2017	461
2017/2018	537
2018/2019	554
2019/2020	474
2020/2021	688

7. Of most relevance the average over the last five years (2016/17 to 2020/21), being 543 per annum (pa) on average, with the last year being the highest (notwithstanding the context of Covid-19 and its impact on the development industry at a national scale). Furthermore, the ‘Review of Local Housing Needs’ report by Icen Projects [[CD 3.75](#)] indicates, at paragraph 1.18, that this level of construction is achievable. Also, as further explained within Paragraph 2.16 of the Council’s latest [Housing Delivery Test Action Plan \(2019/2020\)](#), this “*increase in recent housing delivery has partially occurred due to the significant increase in the number of new net dwellings approved over the last few years*”, particularly on major site allocations adopted in the 2016 Site Allocations Local Plan which have come forward in recent years.

Inspector's Question 3: [re. expected housing supply post-adoption]

Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

TWBC response to Question 3

8. The Council's response to this question follows the Council's response to Question 1 where regard is given to the Updated Housing Trajectory in **Appendices 1 & 2**.
9. Table 3 below takes the anticipated annual completions from Appendix 1 and shows that it estimates a total of **4,386 dwellings** being delivered in the first five years following adoption of the Plan (i.e., from 1 April 2023 to 31 March 2028).

Table 2 - Anticipated Housing Supply in Plan Period (Updated Housing Trajectory)

Plan Year	Updated Trajectory Projected Housing Completions	Updated Trajectory Cumulative Projected Housing Completions
2020/21	688	688
2021/22	744	1432
2022/23	859	2291
2023/24	895	3186
2024/25	763	3949
2025/26	968	4917
2026/27	865	5782
2027/28	895	6677
2028/29	900	7577
2029/30	855	8432
2030/31	831	9263
2031/32	817	10080
2032/33	710	10790
2033/34	681	11471
2034/35	468	11939
2035/36	507	12446
2036/37	456	12902
2037/38	441	13343

10. This supply figure incorporates the expected delivery of extant planning permissions as at 1 April 2021 and anticipates delivery to have begun on the strategic site allocations proposed at Paddock Wood and Tudeley Village, as well as a number of other proposed site allocations across the borough, in addition to a windfall allowance. (For details see **Appendices 1 & 2**). This includes some sites allocated in the Submission Local Plan on which there has been planning activity already, and are awaiting the adoption of the Plan – including for example for release of land from the Green Belt,

Inspector's Question 4: [re. housing trajectory evidence]

What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

TWBC response to Question 4

11. The Council considers that its response to Question 1 of Matter 9, Issue 1 [TWLP/038] also relates to this question. That response draws upon the underpinning methodology applied in determining the phasing and build-out rate of sites, as well as the site-specific factors which have been considered.
12. As stated in that earlier response, the five-year housing land supply has been closely scrutinised, and tested, at appeals recently. The methodology and phasing of sites have been essentially endorsed, while the Updated Trajectory takes account of the respective outcomes, as well as drawing on the most recent advice from promoters on programmes.

Inspector's Question 5: [re. clear evidence of deliverability]

Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years?

TWBC response to Question 5

Introduction

13. As noted in response to previous questions, the Council has demonstrated clear evidence of deliverability in relation to its current, published five-year housing land supply position via its most recent Five-Year Housing Land Supply Statement for 2020/2021 [[PS 020](#)].
14. However, it is assumed that, as this question follows on from previous questions relating to the position at adoption – that is, at April 2023 – the following Consideration relates to the deliverability of sites over the extended five-year period from April 2023 to March 2028.
15. In this situation, the Council acknowledges that sites phased within the five years should still meet the NPPF definition of deliverable, namely that: *“to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years”*. The definition further clarifies that, where a site *“has been allocated in a development plan ... it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”*. (NPPF Glossary)
16. The Council believes that those sites in its Updated Housing Trajectory (**Appendices 1 & 2**), that do not currently have full planning permission, but which are anticipated for delivery up to March 2028, are justified in terms of there being clear evidence of their deliverability.
17. At the same time, it should be noted that the deliverability of some sites is inherently dependent upon the successful adoption of the Plan (for example, the strategic sites). As such, it is emphasised that the housing trajectory assumes successful adoption of the Plan.

Consideration

18. The list below lists those proposed allocations within **Appendices 1 & 2** which are yet to gain full/detailed planning permission for the full extent of the allocation, and/or which have outline permission only, as of May 2022, but which the Council considers to be deliverable within the first five years post adoption of the Local Plan. Summary justifications in relation to each site are contained in **Appendix 3**.
- AL/RTW 1 (Former Cinema Site, Mount Pleasant Road)
 - AL/RTW 6 (Land at 202 and 230 Upper Grosvenor Road)
 - AL/RTW 7 (Land at Former Gas Works, Sandhurst Road)
 - AL/RTW 11 (Former Plant & Tool Hire, Eridge Road)
 - AL/RTW 13 (Turner's Pie Factory, Broadwater Lane)
 - AL/RTW 15 (Land at Showfields Road and Rowan Tree Road)
 - STR/SS 1 (The Strategy for Paddock Wood and east Capel)
 - STR/SS 3 (The Strategy for Tudeley Village)
 - AL/CRS 3 (Turnden Farm, Hartley Road, Cranbrook)
 - AL/CRS 6 (Land South of The Street, Sissinghurst)
 - AL/BM 2 (Land at Maidstone Road)
 - AL/FR 1 (Land at Cranbrook Road, Frittenden)
 - AL/LA 1 (Land to the west of Spray Hill)
 - AL/PE 2 (Land at Hubbles Farm and South of Hastings Road)
 - AL/SA 2 (Sharps Hill Farm, Queen Street)
 - AL/SP 1 (Land to the West of Langton Road and South of Ferbies)
19. As listed above, there are 16 site allocations without full/detailed planning permission, and/or which have outline permission only, as of May 2022, that are phased for delivery within the five years from 1 April 2023 to 31 March 2028.
20. As can be seen from the site-specific circumstances, as set out within **Appendix 3**, their likely delivery within these five years draws upon recent planning activity, such as the submission of planning applications and/or pre-application discussions that are currently taking place, as well as ongoing discussions with site promoters.

Conclusion

21. Given the above, the Council considers that, for those sites proposed for allocation in the Local Plan, but which do not yet have full/detailed planning permission, and/or which have outline permission only, as of May 2022, there is clear and sufficient evidence that housing completions will begin within the five-year period post-adoption of the Local Plan (i.e., from 1 April 2023 to 31 March 2028). It is noted however, that deliverability for some site allocations (particularly the site allocations involving Green Belt, notably the strategic releases) is inherently dependent upon the adoption of the Local Plan.

Inspector's Question 6: [re. projected housing delivery for strategic sites]

How have the projected rates of housing delivery been established for the strategic sites at Tudeley Village and Paddock Wood and East Capel? Are the figures realistic when taking into account the need for supporting infrastructure?

TWBC response to Question 6

Introduction

22. The Council considers that its response to this Question should be read in conjunction with the Council's response to Question 5 which provided a commentary on the deliverability of these strategic sites (subject of course to the adoption of the Local Plan). In addition, this response should also be read in conjunction with the Council's response to Questions in Matter 6, Issue 1 (Tudeley Village) and Issue 3 (Paddock Wood and east Capel) [TWLP/022 and TWLP/024 respectively].
23. The proposed housing trajectory has stemmed from detailed and ongoing discussions with each of the Strategic Site promoters. As previously stated, the Council has signed Statements of Common Ground (SoCG) with all the site promoters at STR/SS 1 (Paddock Wood and East Capel) and STR/SS 3 (Tudeley Village). The site promoters for STR/SS 1 include Redrow, Persimmon, Crest Nicholson, and Dandara, and the site promoter for STR/SS 3 is Hadlow Estate. These SoCGs set out the agreed anticipated phasing for each relevant parcel.
24. It is noted that, while the Tudeley Village phasing, as addressed within the SoCG with Hadlow Estate, reflects the Submission Local Plan phasing, the phasing for STR/SS 1 in the updated Housing Trajectory (**Appendices 1 & 2**) reflects the updated/amended phasing addressed within the SoCGs with Redrow and Persimmon, Crest Nicholson, and Dandara. As also mentioned in the Council's response to Question 5 (in **Appendix 3**), it should be noted that a relatively small revision to the trajectory for the eastern parcel of STR/SS 1 was made by Redrow and Persimmon on 6 May 2022 (less 50 units in 2023/24, and plus 50 units in 2033/34) due to a minor delay in the submission of a planning application due to the amended timetable of the Local Plan examination. The commentary below provides further commentary on how the anticipated phasing was

established and the extent to which they are considered to be realistic when taking into account the need for supporting infrastructure.

Consideration

Tudeley Village (STR/SS 3)

25. Paragraph 5.29 (Bullet Point 1) of the Council's Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)] explains that *"additional consideration has been given to the phasing and expected annual delivery/build-out rates beyond the Council's Housing Delivery Phasing and Build-Out Rate Methodology"* with regard to the strategic sites.
26. In particular for Tudeley, it is noted that *"it is proposed that for the first 10 years of delivery from 2025/26, 150 units are expected per annum, increasing to 200 per annum during the year after. Although lower than ... that proposed in the phasing methodology (based on sites of 2,000+ dwellings), further analysis of the data analysed in the Letwin Review (2018) indicates that, for sites between 2,000 and 4,000 units, 181 units are generally delivered per annum (see [Annex AX26](#) of Letwin Review (2018)). Consequently, as Tudeley is expected to in total deliver up to 2,800 units, it is considered that the expected delivery of 150-200 per annum is appropriate. It should also be noted that, due to the expected start date of 2025/26, delivery of this site is expected to extend beyond the Plan period (i.e. beyond 2038)"*.
27. Hadlow Estate have put forward a trajectory, which aligns with the Council's own assessment and understanding of the local market; hence, it is reflected in the SoCG between the Council and Hadlow Estate. [[CD 3.139](#)] Hadlow Estate, within paragraph 2.40, anticipate that, *"assuming the Local Plan is adopted early in 2023, the Estate is targeting the submission of an Outline and Phase 1 planning application in 2023. The commencement of enabling infrastructure works could begin in 2024 and construction of the first units in 2025"*.
28. Furthermore, particularly with regard to the infrastructure requirements of Policy STR/SS 3, Hadlow Estate explain in Paragraph 2.42 that they *"will ensure the timely and consistent delivery of Tudeley Village through a delivery model which will bring key infrastructure to sites ahead of delivery to the market. The first phase of development will start at the south west of the site, with a new access point from the B2017 Five Oak*

Green Road allowing for a new entrance road running eastwards to the first neighbourhood centre. The Estate will deliver this road and ensure there is capacity and connection points to key infrastructure, before appointing housebuilders to deliver housing on plots served by this new infrastructure”.

29. Moreover, as also explained in Paragraph 2.43, *“utilities providers have confirmed that the site can be enabled from existing and new infrastructure with Hadlow Estate meeting proportionate contributions for such improvements. For example, a new electricity substation would be developed from the outset. Southern Water has advised there is existing capacity in the foul drainage network for a small number of units before upgrades are required, to include the provision of a new main, and there is existing capacity available via a local point of connection for potable water. The Council confirms ongoing and regular discussions have taken place with Southern Water to enable this growth to be considered and accounted for in Southern Water’s next Business Plan from 2025, AMP8”.*
30. Hadlow Estate, within Paragraph 2.44, consider that *“this approach, by which the Estate enables sites for development by apportioning them into accessible, serviced plots, is a tried and tested model which has been successfully undertaken at comparable developments, such as Chapelton in Aberdeenshire and Tornagrain near Inverness”.*
31. The Tudeley Village Delivery Strategy, submitted by Hadlow Estate at Regulation 19 Stage (PSLP_1630), sets out in detail its proposed delivery of the new settlement, including phasing. This includes (at page 57) details of the landowner-led delivery model. The Estate will take the role of Master Developer and will employ builders to construct the village.
32. The Council has confidence that the indicative phasing for Tudeley Village, to begin delivery by 2025/26, is realistic and achievable when taking into account the required infrastructure. Discussions are ongoing and will continue to take place between the Council, Hadlow Estate, and relevant key stakeholders regarding the detailed schedule of infrastructure delivery, including key trigger points.

Paddock Wood and East Capel (STR/SS 1)

33. As above, paragraph 5.29 (Bullet Point 2) of the Council’s Housing Supply and Trajectory Topic Paper explains that *“additional consideration has been given to the*

phasing and expected annual delivery/build-out rates beyond the Council's Housing Delivery Phasing and Build-Out Rate Methodology" with regard to the strategic sites.

34. In particular for Paddock Wood, while the Topic Paper refers to 300 units expected to be delivered per annum from 2025/26 (which has subsequently been further refined), which was based on a similar assessment of the Letwin Review (2018), it is noted that *"this site has been strategically masterplanning by David Lock Associates, a reputable national consultancy who has considerable experience of undertaking masterplanning work for large scale strategic settlements"*. Further, *"the masterplan for Paddock Wood and east Capel has been informed through discussions with the four main housebuilders around Paddock Wood (Crest Nicholson, Dandara, Redrow and Persimmon) and it is anticipated that all four will build on their site approximately simultaneously in response to market conditions"*. In addition, DLA considered that the initially anticipated delivery of 300 units per annum as being a reasonable expectation for strategic sites (which equates to four outlets delivering one market home per week).
35. As outlined previously, all the SoCGs between the Council and Crest Nicholson [[CD 3.137](#)], Dandara [[CD 3.138](#)], and Redrow and Persimmon [[CD 3.140](#)] include an agreed delivery trajectory for each relevant parcel, whereby both the Council and the site promoters have determined through discussions and subsequently agreed the anticipated trajectories to be reasonable and achievable for the parcels at STR/SS 1. As noted previously, this updated phasing has been incorporated into the updated Housing Trajectory in **Appendices 1 & 2**.
36. Within the SoCG with Redrow and Persimmon in particular, it is noted that the intention is for two separate hybrid applications to be submitted in due course to reflect the different land ownerships, while *"discussions are taking place over the approach for a third [joint] application to be submitted dealing with associated infrastructure works"* which will include a proposed bridge to facilitate the proposed bus crossing (Paragraphs 2.14 and 2.39). Within Paragraph 2.42, Redrow and Persimmon explain that they have *"committed to progressing the application in line with the policy requirements of the TWLP, and specifically policy STR/SS1 and the principles of the DLA Masterplanning and Infrastructure Study. This includes the provision of the identified infrastructure to deliver the strategic growth around Paddock Wood on garden settlement principles"*.

37. The Strategic Sites Masterplanning and Infrastructure study identifies the comprehensive framework of infrastructure required to deliver the sites on garden settlement principles [CD 3.66a]. This is accompanied by broad phasing assumptions as set out in Table 11- short (pre-2024), medium (2025-2032) and long (2032 onwards). This information has fed into discussions on the housing trajectory for the Strategic Sites. It has also fed into the viability assessment which has deemed the delivery of the Strategic Sites to be viable, and not reliant on external funding. It is considered that this level of information is appropriate at this time, but the Council is further refining the infrastructure delivery through the identification of more detailed trigger points in close discussions with the infrastructure providers.
38. It is further noted within all SoCGs that there may be a requirement for Shared infrastructure provision between site promoters in relation to the delivery of the infrastructure requirements of Policy STR/SS 1, and as such *“it is agreed that all parties will work together positively and expeditiously to agree an appropriate mechanism for equitable and timely infrastructure delivery”*. Each SoCG also explains that all *“parties agree that further work is required to develop the delivery of the infrastructure associated with the growth around Paddock Wood, from the schedule set out in the DLA Masterplanning and Infrastructure Study”*. As such, it is acknowledged that *“further work is required to aid delivery on the ground”*, the information of which *“will be produced through ongoing discussions with the key stakeholders, and set out within the Framework Masterplan”*. A recent Position Statement has been prepared (please see Appendix 1 of the Council’s Hearing Statement for Matter 6, Issue 3) which demonstrates the large measure of consensus that exists between those parties on the delivery and shared funding of the infrastructure requirement aspects of the proposed strategic site allocations.
39. The Council therefore has confidence that the indicative phasing for Paddock Wood and east Capel, to begin delivery by 2023/24 (on the eastern parcel), is realistic and achievable when taking into account the required infrastructure, although it should be noted that discussions are ongoing and will continue to take place between the Council, the site promoters, and relevant key stakeholders regarding the detailed schedule of infrastructure delivery, including key trigger points. The outcome of these discussions is anticipated to be provided within Supplementary Planning Documents associated with each parcel.

Inspector's Question 7: [re. windfall allowance]

What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 70 of the Framework?

TWBC response to Question 7

Consideration

40. It is considered that this question is covered within the Council's response to Matter 9, Issue 1, Question 2 [TWLP/038].

Inspector's Question 8: [re. five-year supply on adoption]

Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

TWBC response to Question 8

Introduction

41. The Council's response to this Question follows its response to Questions 1 and 3. This assumes that the Local Plan will be adopted in early 2023, and therefore the five-year supply position would relate to the period 1 April 2023 to 31 March 2028, and which will also have regard to completions prior to 1 April 2023.

Consideration

42. In summarising the calculations from the Council's responses to Questions 1 and 3, which have regard to the Council's updated Housing Trajectory (**Appendices 1 & 2**), it is estimated that, as at 1 April 2023, there would have been 2,291 completions between 1 April 2020 and 31 March 2023. Accounting for these and dividing the residual requirement over the plan period to provide an annual requirement, generates a five-year housing requirement (inclusive of a 5% buffer) of 3,470 dwellings as at 1 April 2023.
43. Within the five-year supply from 1 April 2023 to 31 March 2028, the Council anticipates a total of 4,386 completions. It is therefore expected that there will be 4,386 completions against a housing requirement of 3,470 dwellings, which equates to an anticipated five-year housing land supply of **6.32 years** on adoption of the Plan (5 divided by 3,470, multiplied by 4,386).
44. The Council is therefore confident that there will be a strong five-year housing land supply position on adoption of the Plan.

Inspector's Question 9: [re. flexibility for delays at larger sites]

What flexibility does the plan provide if some of the larger sites do not come forward in the timescales envisaged?

TWBC response to Question 9

45. Flexibility is provided by the overall housing supply, which includes a “buffer”, effectively a potential over-supply, over both the short and medium terms. This is reflected in the anticipated healthy supply of deliverable sites to meet the five-year rolling requirement, with a 5% buffer, up to March 2028, as set out in response to previous question. The trajectory at **Appendices 1 & 2** amply illustrates this through the comparison of anticipated completions against the annual requirement.
46. It is also stressed that, especially for those larger sites anticipated to be delivered earlier in the plan period, there has been, and will continue to be, regular, positive engagement to enable suitable schemes to come forward.

Inspector's Question 10: [re. review mechanism]

Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

TWBC response to Question 10

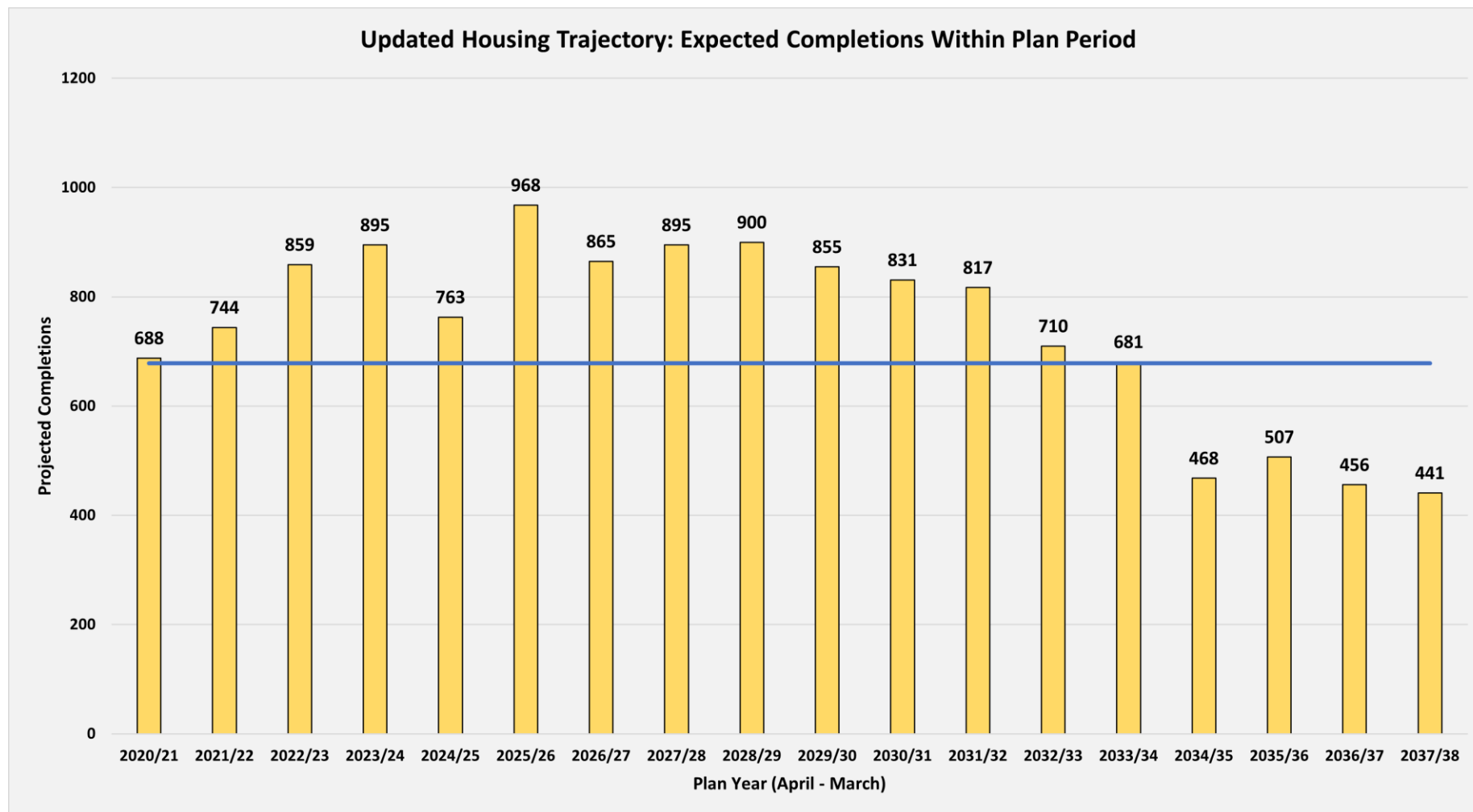
47. Section 7 of the Submission Local Plan [[CD 3.128](#)], particularly Paragraphs 7.13 – 7.25, outlines the Council's approach to monitoring and reviewing all policies within the Plan to ensure that they remain effective for their intended purpose. As Paragraph 7.15 notes, "*it is particularly important to monitor if the Plan is delivering the amount and type of development identified, and that it is being delivered in the right place at the right time*".
48. Moreover, paragraph 7.20 explains that "*the trajectory of housing completions to meet the Local Plan target is reviewed and updated yearly and set housing monitoring is regularly undertaken specifically in relation to whether there is a continuing supply of housing land (for five years with an appropriate buffer) to meet development requirements*".
49. The Council will therefore provide an updated housing trajectory for the Local Plan on an annual basis once the latest data has been obtained as part of the monitoring work required for updated to the five-year housing land supply position.
50. Within Appendix 3 of the Submission Local Plan is the Plan's Monitoring Framework. This outlines the targets and indicators for each policy in the Plan to be assessed against as a measure of their success. The targets and indicators which relate to the delivery of housing (and employment) relate to those for Policies STR 1 (The Development Strategy) and STR 3 (Brownfield Land); in addition, all site allocation policies have targets and indicators relating to their delivery. The performance of these policies against their targets and indicators will be monitored annually with their findings reported within the Council's Authority Monitoring Report (which will be published annually on the Council's [Monitoring webpage](#)).
51. Furthermore, the Council is confident, as per its updated Housing Trajectory in **Appendices 1 & 2**, that there will be a rolling five-year housing land supply throughout

the plan period, particularly given the high anticipated delivery within the early years of the plan period.

52. The Council therefore considers it to be unlikely that the identification of additional sites to increase supply will be necessary. However, it should be noted that the Council has published, and will continue to publish, a Housing Delivery Test Housing Action Plan on an annual basis (this is also/will also be published on the Council's Monitoring webpage). The latest [Housing Delivery Test Action Plan 2019/20](#) was published in September 2021 and seeks to address any causes of under-delivery and to outline actions to be undertaken by the Council to boost housing delivery within the borough in future years.
53. Indeed, while it is a requirement within the National Planning Policy Framework (Paragraph 76) to publish an action plan every year if previous housing delivery has fallen below 95% (based on the past three recorded years' worth of completions against housing targets), the Council will continue to publish an action plan regardless of whether delivery has exceeded the target.
54. Notwithstanding the above, as highlighted at paragraph 7.23 of the SLP, the Council will undertake a formal review of the Local Plan, in line with legislative requirements.
55. In summary, it is believed that there are appropriate review mechanisms, as identified in the Plan, to consider progress against and to identify any appropriate steps to increase supply if required.

Appendices

Appendix 1: Updated Housing Trajectory – Update of Figure 9 of the Submission Local Plan (Housing Trajectory)



Appendix 2: Updated Local Plan Housing Trajectory – Update of Table 9 of the Housing Supply and Trajectory Topic Paper

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441
Cumulative Projected Housing Completions	688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343
Housing Target	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative Housing Target	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	Royal Tunbridge Wells	150	175	200	0	0	0	0	0	0	0	0	0	0	0	0	44	44	44	43	0	0	175
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	-8	0	0	0	0	0	0	0	0	0	0	0	0	-8
AL/RTW 2	Land at the Auction House, Linden Park Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	100
AL/RTW 4	Land at 36-46 St John's Road	Royal Tunbridge Wells	65	78	90	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	100
AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	Royal Tunbridge Wells	40	43	45	0	0	0	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42
AL/RTW 7	Land at former Gas Works, Sandhurst Road	Royal Tunbridge Wells	170	185	200	0	0	0	0	0	0	0	70	70	45	0	0	0	0	0	0	0	0	185
AL/RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 9	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	69	69	69	0	0	0	0	0	0	0	0	0	69	0	0	0	0	0	0	0	0	69
AL/RTW 9 (C2 discount)	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	-33	-33	-33	0	0	0	0	0	0	0	0	0	-33	0	0	0	0	0	0	0	0	-33
AL/RTW 10	Montacute Gardens	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	21
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	Royal Tunbridge Wells	45	45	45	0	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	40
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	Royal Tunbridge Wells	50	50	50	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0	0	0	50
AL/RTW 13	Turners Pie Factory, Broadwater Lane	Royal Tunbridge Wells	100	100	100	0	0	0	0	70	24	0	0	0	0	0	0	0	0	0	0	0	0	94

		Plan Year						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
		Actual Year						2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
		Projected Housing Completions						688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441
		Cumulative Projected Housing Completions						688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343
		Housing Target						678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
		Cumulative Housing Target						678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204
Ref	Site Address	Parish	Lower	Mid	Upper																			Totals	
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	Royal Tunbridge Wells	25	28	30	0	0	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	0	28
AL/RTW 15	Land at Showfields Road and Rowan Tree Road	Royal Tunbridge Wells	155	155	155	0	0	0	0	0	0	0	0	37	0	0	0	0	0	0	0	0	0	0	37
AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	Royal Tunbridge Wells	120	120	120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60	60	0	120
AL/RTW 17	Land adjacent to Longfield Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 20	Land at Culverden Stadium, Culverden Down	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30
AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	Royal Tunbridge Wells	80	80	80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	36	80
AL/RTW 22	Land at Bayham Sports Field West	Royal Tunbridge Wells	20	23	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	23
AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	Southborough	16	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SO 2	Land at Mabledon House	Southborough	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SO 3	Land at Baldwins Lane	Southborough	26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
STR/SS 1	The Strategy for Paddock Wood and east Capel	Paddock Wood	3490	3540	3590	0	0	0	10	120	233	310	420	420	390	390	340	290	280	170	102	50	50	3575	
STR/SS 2	The Strategy for Paddock Wood Town Centre	Paddock Wood	30	30	30	0	0	0	0	14	0	0	0	5	5	5	1	0	0	0	0	0	0	30	
STR/SS 3	The Strategy for Tudeley Village	Capel	2100	2100	2100	0	0	0	0	0	150	150	150	150	150	150	150	150	150	150	150	200	200	200	2100
AL/PW 1	Land at Mascalls Farm	Paddock Wood	412	412	412	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 1	Land at Brick Kiln Farm, Cranbrook	Cranbrook & Sissinghurst	180	180	180	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	Cranbrook & Sissinghurst	35	40	45	0	0	0	0	0	0	0	0	0	0	0	0	0	40	0	0	0	0	40	
AL/CRS 3	Turden Farm, Hartley Road, Cranbrook	Cranbrook & Sissinghurst	200	202	204	0	0	0	0	34	70	62	0	0	0	0	0	0	0	0	0	0	0	166	
AL/CRS 4	Cranbrook School	Cranbrook & Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 5	Sissinghurst Castle Garden	Cranbrook & Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Plan Year		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18					
Actual Year		2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38					
Projected Housing Completions		688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441					
Cumulative Projected Housing Completions		688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343					
Housing Target		678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678					
Cumulative Housing Target		678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204					
Ref	Site Address	Parish	Lower	Mid	Upper																			Totals
AL/CRS 6	Land south of The Street, Sissinghurst	Cranbrook & Sissinghurst	20	20	20	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	19	
AL/CRS 7	Land at corner of Frittenden Road and Common Road, Sissinghurst	Cranbrook & Sissinghurst	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 1	Land at the White House, Highgate Hill	Hawkhurst	42	42	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 2	Brook House, Cranbrook Road	Hawkhurst	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 3	Former Site of Springfield Nurseries	Hawkhurst	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 4	Land off Copthall Avenue and Highgate Hill	Hawkhurst	70	75	79	0	0	0	40	31	0	0	0	0	0	0	0	0	0	0	0	0	71	
AL/HA 5	Land to the north of Birchfield Grove	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 6	Sports Pavilion, King George V Playing Fields, The Moor	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 7	Hawkhurst Station Business Park	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 8	Site at Limes Grove (March's Field)	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 1	Land adjacent to New Pond Road (known as Uphill), Benenden	Benenden	18	19	20	0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	19	
AL/BE 2	Feoffee Cottages and land, Walkhurst Road, Benenden	Benenden	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	24	
AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	24	
AL/BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	Brenchley and Matfield	45	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BM 2	Land at Maidstone Road	Brenchley and Matfield	11	13	15	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	15	
AL/FR 1	Land at Cranbrook Road, Frittenden	Frittenden	25	28	30	0	0	0	23	0	0	0	0	0	0	0	0	0	0	0	0	0	23	
AL/GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	Goudhurst	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/GO 2	Land at Triggs Farm, Cranbrook Road	Goudhurst	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	Horsmonden	45	50	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Plan Year		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18					
Actual Year		2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38					
Projected Housing Completions		688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441					
Cumulative Projected Housing Completions		688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343					
Housing Target		678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678					
Cumulative Housing Target		678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204					
Ref	Site Address	Parish	Lower	Mid	Upper																			Totals
AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	Horsmonden	80	90	100	0	0	0	0	0	0	0	0	0	0	0	44	44	2	0	0	0	90	
AL/HO 3	Land to the east of Horsmonden	Horsmonden	115	140	165	0	0	0	0	0	0	0	0	0	0	70	50	0	0	0	0	0	120	
AL/LA 1	Land to the west of Spray Hill	Lamberhurst	25	28	30	0	0	0	0	28	0	0	0	0	0	0	0	0	0	0	0	0	28	
AL/PE 1	Land rear of High Street and west of Chalket Lane	Pembury	50	55	60	0	0	0	0	0	0	0	0	0	44	11	0	0	0	0	0	0	55	
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	Pembury	80	80	80	0	0	0	0	0	44	36	0	0	0	0	0	0	0	0	0	0	80	
AL/PE 3	Land north of the A21, south and west of Hastings Road	Pembury	80	80	80	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	0	80	
AL/PE 4	Land at Downingbury Farm, Maidstone Road	Pembury	25	25	25	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	25	
AL/PE 5	Land at Sturgeons fronting Henwood Green Road	Pembury	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 6	Woodsgate Corner	Pembury	80	100	120	0	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	100	
AL/PE 6 C2 Discount	Woodsgate Corner	Pembury	-18	-29	-40	0	0	0	0	0	0	0	0	0	0	0	-20	-9	0	0	0	0	-29	
AL/PE 7	Cornford Court, Cornford Lane	Pembury	68	68	68	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 7 C2 Discount	Cornford Court, Cornford Lane	Pembury	-33	-33	-33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8	Owlsnest Wood, Tonbridge Road	Pembury	75	75	75	0	0	0	0	35	40	0	0	0	0	0	0	0	0	0	0	0	75	
AL/PE 8 C2 Discount	Owlsnest Wood, Tonbridge Road	Pembury	-37	-37	-37	0	0	0	0	-17	-20	0	0	0	0	0	0	0	0	0	0	0	-37	
AL/RU 1	Lifestyle Motor Europe, Langton Road	Rusthall	15	15	15	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	15	
AL/SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst	Sandhurst	10	13	15	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	15	
AL/SA 2	Sharps Hill Farm, Queen Street	Sandhurst	10	13	15	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	13	
AL/SP 1	Land to the west of Langton Road and south of Ferbies	Speldhurst	10	11	12	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	11	
AL/SP 2	Land at and adjacent to Rusthall Recreation Ground, Southwood Road	Speldhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total from Allocations						0	0	130	355	523	590	713	761	733	729	715	608	579	366	405	354	339	7900	
Windfall Allowance									122	122	122	122	122	122	102	102	102	102	102	102	102	102	102	1548
Total from Extant Planning Permissions (01 April 2021)							744	859	765	286	323	153	60	17	0	0	0	0	0	0	0	0	0	3207

Appendix 3: Deliverability of sites without current full planning permission

For clarification, in line with the National Planning Policy Framework's definition of deliverable, the sites listed below are those sites proposed for allocation which do not have full/detailed planning permission, and/or which have outline permission only, as of May 2022. The exception is AL/RTW 1 where the current permission onsite is not considered to be 'live'. The sites listed below are those which are considered to be deliverable within the five years following adoption of the Plan (from 1 April 2023 – 31 March 2028).

AL/RTW 1 (Former Cinema Site, Mount Pleasant Road)

1. While this site technically has planning permission (19/01869/FULL, as a minor material amendment to 17/02262/FULL), granted in September 2019, which has been lawfully implemented (as determined through a lawful development certificate), it is accepted that it will not be built out. In fact, control of the site was recently acquired by Retirement Villages Group, a developer which specialises the delivery of older persons' housing. The developer has a track record of delivery, is keen to progress with the site and carried out a public consultation in March-April 2022 to inform a subsequent revised planning application. The developer has also produced a website which outlines their proposals and any latest updates toward developing the site (see [website](#)). The developer is seeking a higher number of units on this site than the existing permission and allocation – however the figures in the trajectory reflect that of the allocation. The agent (DHA Planning) for Retirement Villages also confirmed to the Council on 9 May 2022 that, based on the current programme, the first unit is expected to be completed in 2025 and all other units will be completed by the end of that year, hence the site has been phased for completion in 2025/26. Further, the agent considered that the development would be completed as a single phase, hence all units are currently phased for completion within this single year. The number of units to be proposed in the revised application are at present being determined and therefore, as above, the allocation capacity has been phased accordingly. Therefore, given that there is a new developer on board keen to progress with a planning application and bring the site forward, it is considered that there

is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/RTW 6 (Land at 202 and 230 Upper Grosvenor Road)

2. Outline planning permission (21/00460/OUT) was recently granted for this site on 30 March 2022. The permission is for 44 units (net 42 as the proposals includes the demolition of two existing properties, hence the allocation has been accordingly phased for 42 units within the updated Housing Trajectory, rather than the allocation mid-point capacity of 43 units). There is also a pending Reserved Matters application (awaiting validation). Therefore, given that there is an outline planning permission on site with a pending Reserved Matters application, and that there is a developer on board (Silverleaf Group), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/RTW 7 (Land at Former Gas Works, Sandhurst Road)

3. It is acknowledged that there is no current planning application or any pre-application discussions taking place onsite. However, the Council received confirmation from the agent (Carter Jonas) acting on behalf of Southern Gas Networks (SGN) that SGN have now sold the site, which is understood to be to J Murphy and Sons (JMS; a construction company). Previous correspondence (August 2021) with the architects (Richard Hopkinson Architects) acting on behalf of JMS confirmed that (subject to the sale proceeding) JMS will seek to commence pre-applications discussions/bring the site forward within the short-term. A provisional timetable was provided which sought to commence pre-application discussions end of 2021/early 2022 with completion by mid-2025; given that pre-application discussions are yet to take place (considered likely to be due to the sale having now just been completed), it is considered reasonable to expect that the site will begin delivering units in 2027/28 as currently phased. It is also understood that JMS were undertaking further land contamination investigations in September 2021 to determine the extent of land contamination and any resultant strategy, the details of which will be provided by HMS as part of the planning application process. Therefore, given that the sale of the site from SGN has now been completed, and that previous correspondence with the new owners indicates that the site will come forward within the short to medium term, it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/RTW 11 (Former Plant & Tool Hire, Eridge Road)

4. A planning application (21/03298/FULL) for this site was submitted in September 2021 and is currently awaiting a decision. The proposal is for 40 retirement apartments and the refurbishment of two existing properties (hence the allocation has been accordingly phased for 40 units within the updated Housing Trajectory, rather than the allocation capacity of 45 units). It is currently expected that the application will be determined via Planning Committee within the summer 2022. Therefore, given that there is a planning application submitted on site, and that there is a developer on board (Beechcroft Developments), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan. The Planning Inspector for the Hawkhurst Golf Club appeal also considered that this site should be included within the five-year housing land supply from 1 April 2021 (see [Inspector's Report](#)).

AL/RTW 13 (Turner's Pie Factory, Broadwater Lane)

5. A planning application (22/00238/FULL) for this site was submitted in January 2022 and is currently awaiting a decision. The proposal is for 94 dwellings (36 houses and 58 apartments) and a remote working/community hub (hence the allocation has been accordingly phased for 94 units within the updated Housing Trajectory, rather than the allocation capacity of 100 units). Therefore, given there is a planning application submitted on site, and that there is a developer onboard (Urban Life), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan. The Planning Inspector for the Highgate Hill and Copthall Avenue appeal also considered that this site should be included within the five-year housing land supply from 1 April 2021 (see [Inspector's Report](#)). In particular, the Inspector considered that the submission of the planning application "*shows that firm progress is being made and the site is deliverable*", with the phasing considered to be "*realistic and in accordance with the Council's Housing Supply and Trajectory Topic Paper*".

AL/RTW 15 (Land at Showfields Road and Rowan Tree Road)

6. It is noted that the phasing for this site has reduced down to 37 units following further discussions with Town and Country Housing Group who currently own the site (please refer to Matter 11, Issue 4, Questions 10 and 11 for further information on this site). While

it is acknowledged that there is no current planning application submitted, there are on-going pre-application discussions taking place. It is understood that there is an urgent need to address fire risks in some units but balanced against this are timescales to resolve community use on the site and the need to arrange for the potential re-housing of existing residents (although it is understood that good progress on planning for the latter is being made). Given the above the Council therefore considers that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

STR/SS 1 (The Strategy for Paddock Wood and east Capel)

7. A total of 1,093 dwellings are phased within the five years post-adoption of the Plan as part of STR/SS 1. While it is acknowledged that there is currently no planning permission on this site in any of the parcels, it is anticipated that the eastern parcel, currently promoted by Redrow and Persimmon, could begin delivery in 2023/24 subject of course to the submission of a planning application (which is expected imminently following the submission of an EIA Scoping Opinion application on a proposal for 1,200 dwellings, a local centre, a two-form entry primary school, and land to accommodate a 2 form-entry extension to Mascalls Academy (21/02129/EIASCO) in June 2021) and subsequent planning permission(s) (provided that the application(s) accord(s) with the Submission Local Plan).

8. The Council has had ongoing discussions with both site promoters whereby all three parties have entered into a Planning Performance Agreement (PPA) to progress pre-application discussions on this eastern parcel. As noted within Paragraph 2.41 of the Statement of Common Ground (SoCG) between Tunbridge Wells Borough Council, Redrow and Persimmon [CD 3.140], *“this PPA runs up to the submission of a planning application, and it is anticipated this will be extended following submission through to determination. The aim of this Agreement is to continue to facilitate joint collaborative working”*. As per Paragraph 2.42, *“Redrow and Persimmon have committed to progressing the application in line with the policy requirements of the TWLP, and specifically policy STR/SS1 and the principles of the DLA Masterplanning and Infrastructure Study. This includes the provision of the identified infrastructure to deliver the strategic growth around Paddock Wood on garden settlement principles”*. All parties

have also been collaboratively working on the Supplementary Planning Document for the eastern parcel.

9. Paragraphs 2.43-2.44 and Table 1 of the SoCG also outline the indicative and anticipated phasing of the sites as determined by Redrow and Persimmon (subject of course to planning permission), which has accordingly been incorporated into the updated Housing Trajectory. However, it should be noted that a relatively small revision to this trajectory was made by Redrow and Persimmon on 6 May 2022 (less 50 units in 2023/24, and plus 50 units in 2033/34) due to a minor delay in the submission of a planning application due to the amended timetable of the Local Plan examination. Therefore, given the above, the Council considers that there is clear evidence that approximately 490 dwellings (of the total 1,093 phased in the five years post-adoption of the Plan as part of STR/SS 1) will be delivered within the five-year period post-adoption of the Plan on this parcel.

10. It is also anticipated that 283 dwellings will be delivered within the five-year period post-adoption of the Plan on the northern part of the western parcel currently being promoted by Crest Nicholson. Within Paragraph 2.28 of the SoCG between Tunbridge Wells Borough Council and Crest Nicholson [CD 3.137], it is noted that Crest aimed to commence *“formal pre-application discussions with TWBC in November/December 2021”* (whereby initial pre-application discussion have subsequently taken place), *“with the intention of submitting a hybrid application in Summer 2022”*. Paragraph 2.29 further states that *“both parties agree that they will work proactively and collaboratively throughout the planning process from commencement of preapplication discussions, through to the determination of the planning application. A Planning Performance Agreement will be entered into to facilitate discussions and help aid the delivery of a comprehensive planning permission in line with the Policy requirements on this site”*. An SPD will also be progressed for this parcel in collaboration with Dandara (who are promoting the southern section of the western parcel). Paragraphs 2.31-2.32 and Table 1 also outline the indicative and anticipated phasing of the site as determined by Crest (subject of course to planning permission), which has accordingly been incorporated into the updated Housing Trajectory. Therefore, given the above, the Council considers that there is clear evidence that approximately 283 dwellings (of the total 1,093 phased in the five years post-adoption of the Plan as part of STR/SS 1) will be delivered within the five-year period post-adoption of the Plan on this parcel.

11. Similarly, it is also anticipated that 200 dwellings will be delivered within the five-year period post-adoption of the Plan on the southern part of the western parcel currently being promoted by Dandara. Within Paragraph 2.25 of the SoCG between Tunbridge Wells Borough Council and Dandara [CD 3.138] noted that Dandara aimed to commence pre-application discussions on the site in October 2021 (whereby initial pre-application discussion have subsequently taken place), and similarly that “*both parties agree that they will work proactively and collaboratively throughout the planning process from commencement of pre-application discussions, through to the determination of the planning application. A Planning Performance Agreement will be entered into to facilitate discussions and help aid the delivery of a comprehensive planning permission in line with the Policy requirements on this site*”. An SPD will also be progressed for this parcel in collaboration with Crest Nicholson (who are, as above, promoting the northern section of the western parcel). Paragraphs 2.29-2.30 and Table 1 also outline the indicative and anticipated phasing of the site as determined by Dandara (subject of course to planning permission), which has accordingly been incorporated into the updated Housing Trajectory. Therefore, given the above, the Council considers that there is clear evidence that approximately 200 dwellings (of the total 1,093 phased in the five years post-adoption of the Plan as part of STR/SS 1) will be delivered within the five-year period post-adoption of the Plan on this parcel.

12. It is also anticipated that approximately 60 units will be delivered within the five-year period post-adoption of the Plan on the northern part of the Town Centre (north of the railway line). This relates specifically to the site of the Barth-Haas UK headquarters and production facilities which was submitted by DHA Planning on behalf of Barth-Haas UK Ltd during the Regulation 18 consultation on the Draft Local Plan (DLP_7242/7260/7261) and further promoted during the consultation on the Pre-Submission Local Plan (PSLP_2019-2025). This site is DPC14 (as assessed in the SHELAA [CD 3.77I]) where a potential residential capacity of 40-140 units is identified (hence 90 units, the mid-point, has been phased in the trajectory). It should be noted that the identified capacity of 40-140 units follows the assessment made by David Lock Associates (DLA) in the Strategic Sites Masterplanning and Infrastructure Study [[CD 3.66a](#)] in Paragraph 4.63. The Regulation 19 representation from DHA on behalf of Barth-Haas confirms that the site is deliverable for residential-led development (potentially including some retail and/or leisure uses too) over the plan period. It was also confirmed in the Regulation 19 representation

that Barth-Haas were considering relocation with an alternative location in or close to Paddock Wood preferred, which would then free up the site. It is understood from correspondence with the agent on 11 May 2022 that Barth-Haas is actively exploring relocation in Paddock Wood and within the strategic development area. Therefore, given that the site has been promoted by a planning agent on behalf of the current landowner for residential development and their consideration that the site is deliverable, and that Barth-Haas are actively exploring relocation, the Council considers that there is clear evidence that approximately 60 units (of the total 1,093 phased in the five years post-adoption of the Plan as part of STR/SS 1) will be delivered within the five-year period post-adoption of the Plan on this site.

13. In addition, 60 units currently phased for 2025/26 are expected to be delivered by Countryside in the eastern parcel (as part of the existing permitted Church Farm development) in 2025/26. These 60 units are currently subject to an existing full planning application (21/01862/FULL) which is awaiting a decision. Therefore, given that there is a planning application submitted on site, and that there is a developer onboard (Countryside), it is considered that there is clear evidence that 60 units (of the total 1,093 phased in the five years post-adoption of the Plan as part of STR/SS 1) will be delivered within the five-year period post-adoption of the Plan on this site.

STR/SS 3 (The Strategy for Tudeley Village)

14. A total of 450 dwellings are phased within the five-year period post-adoption of the Plan as part of STR/SS 3. While it is acknowledged that there is no current planning application on the site, Hadlow Estate in the SoCG between Tunbridge Wells Borough Council and Hadlow Estate [CD 3.139] state, in Paragraph 2.40, that, “*assuming the Local Plan is adopted early in 2023, the Estate is targeting the submission of an Outline and Phase 1 planning application in 2023. The commencement of enabling infrastructure works could begin in 2024 and construction of the first units in 2024*”. The anticipated delivery would be 150 dwellings per annum for the first 10 years, followed by 200 per annum thereafter. Hadlow Estate further note that “*this development trajectory is based on the landowner’s assessment and understanding of the local market as well as Tunbridge Wells Borough Council’s own assessments*”. While there are no current housebuilders onboard, Hadlow Estate note that “*the landowner will seek to appoint several housebuilders who will work concurrently to deliver each phase of Tudeley Village*”, with a detailed exercise to identify

housebuilders capable of taking on the first phase of development planned alongside the determination of the planning application for the first phase.

15. It is further noted by Hadlow Estate that “*there is sufficient capacity within the proposed trajectory to accommodate some flexibility in the pace of delivery. The Estate has taken a relatively cautious approach to trajectory planning and an improved pace of delivery may be possible, depending on the successful delivery of the first phase and the market demand*”. It is added that an SPD will also be progressed for Tudeley Village through joint working with all parties. Therefore, given the above, subject to the adoption of the Local Plan, the Council considers that there is clear evidence that 450 units will be delivered within the five-year period post-adoption of the Plan on this site.

AL/CRS 3 (Turnden Farm, Hartley Road, Cranbrook)

16. A planning application (20/00815/FULL) has been submitted and received a resolution to grant by the Council’s Planning Committee in February 2021. This application is for 165 dwellings, and so it is acknowledged that this is 1 unit lower than the balance of the allocation mid-point capacity of 200-204 which is currently phased (i.e., 166, mid-point of 164-168) when taking into account the existing permission (18/02571/FULL) of 36 dwellings as at 1 April 2021 (although, it should be noted that a further 3 dwellings were permitted as per 21/01379/FULL on 22 October 2021 (which has not yet been incorporated into the updated Housing Trajectory given the decision date), meaning that, subject to permission of the current application for 165 units, the overall capacity for this site would equate to 204 dwellings (equating to the upper capacity identified within the site allocation)).

17. It is acknowledged, however, that this current application for 165 units, while having received a resolution to grant, is subject to a call-in decision for the determination by the Secretary of State. It is currently expected that a decision will be issued on or before 4 July 2022. Despite this, the Council is confident that the application will be approved, following the Council having resolved to grant the application. If the application is not approved, the Council is confident that the allocation is sound and therefore should be allocated within the Plan. Therefore, presuming that the Local Plan (and this allocation) is adopted, given that there is already a developer onboard (Berkeley Homes) who are delivering part of the site which has already been permitted under 2 separate permissions

referred to above, the Council considers that there is clear evidence that this site will be delivered within the five-year period post-adoption of the Plan.

AL/CRS 6 (Land South of The Street, Sissinghurst)

18. A planning application (21/03914/FULL) for this site was submitted in November 2021 and is currently awaiting a decision. The proposal is for the demolition of the existing St George's Institute building and the erection of a new building providing community facilities alongside 19 dwellings (hence the allocation has been accordingly phased for 19 units within the updated Housing Trajectory, rather than the allocation capacity of 20). Therefore, given that there is a planning application submitted on site, and that there is a developer onboard (Fernham Homes), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/BM 2 (Land at Maidstone Road)

19. An outline planning application (22/00757/OUT) for this site was submitted on 8 March 2022 and is currently awaiting a decision. The proposal is for 15 dwellings alongside additional car parking for Matfield Village Hall (hence the allocation has been accordingly phased for 15 dwellings within the updated Housing Trajectory, rather than the allocation mid-point capacity of 13). Therefore, given that there is now an outline planning application submitted on the site, and that there is a developer onboard (Kent Land and Planning), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/FR 1 (Land at Cranbrook Road, Frittenden)

20. A planning application (21/01638/FULL) for this site was submitted in May 2021. The Council's Planning Committee resolved to grant consent for this on 16 March 2022. The proposal is for 23 dwellings (hence the allocation has been accordingly phased for 23 dwellings within the updated Housing Trajectory, rather than the allocation mid-point capacity of 28). Therefore, given that there is now a planning application submitted on the site, and that there is a developer onboard (Jarvis Land Promotions), it is considered that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/LA 1 (Land to the west of Spray Hill)

21. While this site does not currently have any planning applications submitted, the site has been proactively promoted through various pre-applications discussions with the Council. The site has a developer onboard (Jarvis Homes) and Lee Evans Partnership (acting on behalf of Jarvis Homes) provided a representation to the Council during the Pre-Submission Local Plan (Regulation 19) consultation (PSLP_1136). Within the representation, it was stated that “*a planning application is currently being prepared, following a positive pre-application with the Council’s planning department, for residential development as prescribed in the draft allocation policy*”. While concerns were raised by the site promoter regarding pedestrian linkages/access, it is understood that the developer is looking at other approaches to delivering a pedestrian access from the site to that included within the Policy criteria which are being discussed during ongoing pre-application discussions with both KCC Highways and the Council. The Council is therefore confident that this issue will be overcome, and a suitable scheme can be agreed following these ongoing pre-application discussions. The Council is therefore confident that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan given the ongoing pre-application discussions, the likely submission of a planning application in due course following these discussions, and that there is a developer onboard.

AL/PE 2 (Land at Hubbles Farm and South of Hastings Road)

22. It is acknowledged that no planning application has been submitted on this site, although an EIA Screening Opinion for residential development (21/03366/ENVSCR) was issued on 2 November 2021. The site is also being actively promoted by Barton Willmore on behalf of a developer (Obsidian Strategic) who the Council understands will be preparing pre-application discussions in due course. The Council is therefore confident that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan given the recent issued EIA Screening Opinion, the imminent commencement of pre-application discussions, and that there is a developer onboard.

AL/SA 2 (Sharps Hill Farm, Queen Street)

23. It is acknowledged that an outline application for up to 16 units was refused on 5 Feb 2021 and dismissed on appeal on 5 November 2021 (19/01493/OUT) and therefore will unlikely be resubmitted and subsequently approved until after the adoption of the Local Plan. It is noted that the planning Inspector in their [Inspector’s Report](#) gave limited weight

to the emerging Local Plan allocation Policy. Despite this, the Council is confident that the site allocation remains sound and should remain an allocation in the Plan, and also notes that the site has a housebuilder onboard (Jarvis Homes). Given the above, the Council is therefore confident that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.

AL/SP 1 (Land to the West of Langton Road and South of Ferbies)

24. While it is acknowledged that no current planning application is submitted on this site, the site promoter in their representation submitted on 1 June 2021 during the Regulation 19 consultation on the Pre-Submission Local Plan noted that the landowners entered into an Option Agreement with a developer, Calverley Estates Ltd in November 2020. The landowner also anticipates that the site could come forward relatively quickly within the plan period. Given the above, the Council is therefore confident that there is clear evidence that the site will be delivered within the five-year period post-adoption of the Plan.