

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Note Requested by the Inspector

**Local Plan Examination Note for
Inspector in response to Action Point 26
regarding Early Review of the Local Plan**

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1.0 Introduction

- 1.1 During the Stage 3 Hearing Sessions on the Tunbridge Wells Borough Local Plan, the Inspector asked the Council to prepare a number of Notes on “Action Points”, essentially to clarify its position on certain matters that were discussed.
- 1.2 This Note relates to Action Point 26 relating to Matter 1, Issue 3 – Proposed Strategy and Early Review, and specifically how a policy commitment by the Council could be appropriately embedded into the Local Plan, through Main Modifications to strategic Policy STR 1 The Development Strategy in the Submission Local Plan [[CD 3.128](#)].
- 1.3 In considering this it is necessary to incorporate into the early review policy an appropriate mechanism regarding timescales for both the commencement of an early review and submission of the Local Plan review document for Examination. This being to seek to ensure the Council delivers on its commitment to conduct the review, which will seek to meet unmet housing need for the later part of the plan-period, the Council having a 10-year rather than a 15-year Housing Land Supply.
- 1.4 Related to this is Matter 3, Issue 4 – The Strategy for Tudeley Village, where at Question 1 the Inspector asks whether the suggested early review of the Plan should include reference to Tudeley Village, either as a future development option or broad location for growth.
- 1.5 Section 2 of this Note, presents a suggested modified Policy STR 1 The Development Strategy, incorporating both the commitment to the early review and the mechanism by which this would be controlled, namely timescales for commencement of the review and submission for Examination. A suggested approach as to how Tudeley Village might be appropriately addressed in this Local Plan is then set out.

2.0 Policy STR 1 The Development Strategy – Proposed Modifications

2.1 The suggested modified wording for Policy STR 1 The Development Strategy set out at para 2.2 below, seeks to address the points identified in Section 1 above. The proposed modifications to Policy STR 1 would embed the Council’s commitment to an early review within the Plan and would ensure appropriate trigger points are included within the policy text to ensure a timely commencement of the review, with an appropriate commitment to the then timely submission of the Local Plan review for Examination.

2.2 Early Plan Review: Suggested Policy Wording – Policy STR 1 The Development Strategy

Policy STR 1

The Development Strategy

The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of ~~12,006~~ **11,880** dwellings and 14 hectares of employment (use classes B and E) land are developed, together with supporting infrastructure and services.

To achieve this, the Local Plan:

1. Promotes the effective use of urban and previously developed (brownfield) land, having due regard to relevant Plan policies;
2. Looks to focus new development within the Limits to Built Development of settlements, as defined on the Policies Map, where proposals accord with other relevant policies of this Plan;
3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities, together with the ~~development of two strategic sites, namely:~~
 - a) major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions; ~~and~~
 - b) ~~the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge;~~
4. Includes an allowance for potential delays or non-delivery of sites;

5. Provides for a prestigious new business park to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21;
6. Provides a framework for the preparation of a holistic Area Plan for Royal Tunbridge Wells Town Centre;
7. Provides for some reductions in the area of the Green Belt, notably for land in east Capel (adjacent to Paddock Wood)~~the strategic sites~~ and around Royal Tunbridge Wells and Pembury, where exceptional circumstances warrant this, and where an effective long-term Green Belt is maintained;
8. Limits development within the High Weald National Landscape Area of Outstanding Natural Beauty to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances are demonstrated;
9. Normally limits development in the countryside (being defined as that outside the Limits to Built Development) to that which accords with specific policies of this Plan and/or that for which a rural location is fully demonstrated to be necessary.

Early Partial Review of the Local Plan

Following adoption of the Local Plan, the Council will publish an update to its Local Development Scheme (LDS). This shall set out a timetable for an early review of the Local Plan, which shall commence within six months of its adoption. It shall provide an indicative timescale for submission for Examination, to take place no later than 30 months from commencement of the early review. The Council shall then undertake the early review which shall include investigation of ways of meeting identified unmet housing needs until the end of the plan period (2038).

The early review will:

- i) Commence within six months following adoption of the Local Plan;
- ii) Seek ways of meeting the Council's unmet need (897 dwellings) for the period post adoption to the end of the plan period until 2038;
- iii) Should it be necessary, seek ways of meeting unmet housing need for older people and people with disabilities, including extra care and care home provision;
- iv) Should it be necessary, seek ways of meeting unmet housing needs for Gypsy and Traveller and Travelling Show People;

- v) Include a review of transport and highway issues to cater for local plan growth arising from the Local Plan review (in consultation with National Highways and Kent County Council);
- vi) Include a review of Educational needs to cater for local plan growth arising from the Local Plan review (in consultation with Kent County Council);
- vii) Include a review of Employment needs to cater for local plan growth arising from the Local Plan review;
- viii) Plan for any other infrastructure needs associated with local plan growth arising from the Local Plan review;
- ix) Include a review of joint working with neighbouring planning authorities.

Consideration of Tudeley Village for inclusion in Local Plan Review policy

2.3 In its Hearing Statement response to Matter 3, Issue 4, Question 1 – The Strategy for Tudeley Village, the Council set out its response to the Inspector’s question relating to whether there should be reference to Tudeley Village, either as a future development option or broad location for growth in the Local Plan review policy [[TWLP/126](#)].

2.4 In the conclusion to Question 1 set out in document TWLP/126, the Council set out that:

Para 12. Given the work undertaken to date, particularly on identifying sites in the borough where there are many constraints to development, Tudeley Village has been explored in significant detail and, ultimately, it remains a reasonable option to consider as part of that early review. It is inevitable, therefore, that the Council will have to evaluate it further as an option to form part of its growth strategy in the future, alongside any other reasonable alternatives as they come forward through the local plan review process.

Para 13. Without prejudice to this exercise, given the limited options available to the council at this stage and the extensive level of evidence supporting the Tudeley Village option, the early review of the Plan should also include reference to Tudeley as a broad location for growth.

2.5 At the Stage 3 hearing session held on 19th June, there was discussion about this, including whether it could prejudice the outcome of the Local Plan review.

- 2.6 Having regard to the Council's earlier response on this matter along with discussion at the Stage 3 hearing session, the Council suggests it could be more appropriate to deal with this matter through appropriate new wording in the supporting text to Policy STR 1 The Development Strategy, rather than by direct reference in the policy box itself.
- 2.7 The Council recognises that as part of the main modifications process, a comprehensive review of supporting text to the policy will be needed (set out at pages 35-44 of the Submission Local Plan).
- 2.8 This could incorporate additional text as follows:
- Changes to the Development Strategy in response to the initial findings of the Inspector mean that the Local Plan includes a 10-year rather than a 15-year Housing Land Supply. As such the Council is committed to a partial, early review of the Plan to seek ways of meeting unmet housing need in the later part of the Plan period. All other policies included in the Plan remain applicable for the entire plan period 2020-2038.
 - In carrying out the early review, the Council will identify and assess reasonable options for meeting housing needs, and without prejudice to any decisions made about a future development strategy to meet the unmet need, will consider, as part of this work the potential for land at the previously proposed Tudeley Village (former Strategic Policy STR/SS 3 The Strategy for Tudeley Village) to assist with meeting the housing growth need. Without prejudice, this former strategic allocation would be assessed as part of a wider assessment of sites submitted through a 'Call for Sites' and other land identified by the Council.
- 2.9 The Council welcomes further discussion on this approach should the Inspector consider this necessary.

3.0 Summary and Conclusion

- 3.1 Section 2 of this Note sets out a suggested draft Policy STR 1 The Development Strategy incorporating details of a Local Plan Review policy, and which demonstrates the Council's commitment to the early review. Timescales for commencement of the early review and submission of the review Local Plan for Examination provide appropriate mechanisms to ensure the Council delivers on its commitment.

3.2 It is explained that it is appropriate to consider how Tudeley Village might help meet unmet housing needs as part of the review, but rather than placing direct reference to it in the policy box, the Council suggests that this could be appropriately addressed by additional text to be incorporated into the supporting text to Policy STR 1. Suggested wording is provided.