

**Tunbridge Wells Local Plan
Examination – Stage 3
Response to Matter 8, Issue 1:
Meeting Housing Needs**

Berkeley Homes (Eastern Counties) Ltd

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LICHFIELDS

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1.0 Introduction

- 1.1 This Statement for Matter 8 (Meeting Housing Needs) of the examination of the Tunbridge Wells Local Plan ('the Plan') Part 3 is submitted by Lichfields on behalf of Berkeley Homes (Eastern Counties) Ltd ('Berkeley Homes'). It follows the submission of representations to the EiP Part 2 and the Regulation 19 Draft Local Plan (March to June 2021) in respect of land at Turnden, Land adjacent to Hartley Road, Cranbrook (allocation AL/CRS 3), in which Berkeley Homes owns.
- 1.2 As the Inspector will be aware, the land at Turnden has been subject to a Call-in Inquiry (ref. 20/00815/FULL, APP/M2270/V/21/3273015) seeking permission for the construction of 165 new dwellings and associated landscape management works, with the remaining 14.5 ha given over to landscaping, enhanced green and blue infrastructure and ecological works. Notwithstanding a positive Inspector's conclusion there is no decision on the application. Issues around the site allocation are covered under Matter 6.
- 1.3 This Statement has been prepared as input into the considerations on the housing requirement, housing land supply and the importance of seeking to have a sound local plan in place to enable the delivery much needed homes in the Borough.

Meeting Housing Needs

Issue 1: Housing Requirement and Meeting Housing Needs

Q1. Does the housing requirement and plan period from the submission Plan remain justified and up-to-date? If not, what changes are required to make the Plan sound?

- 1.4 We are aware that the Development Strategy for the Local Plan has been modified by the Council in response to the Inspector’s findings, particularly on a number of major sites, which has had an impact on the housing supply position.
- 1.5 It is a positive that TWBC are proposing to proceed on the basis of meeting the OAN by use of the Standard Method.
- 1.6 The NPPF states that Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for five years following the intended date of adoption³⁵; and
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 1.7 On this basis, the Plan can be found sound on the basis of identifying a 10year supply of developable sites. While this is not ideal, Berkeley Homes consider that it is more important to have a development plan in place that can plan to deliver the homes required over a 10 year period than to delay having any plan for a number of years while further work is undertaken to establish a greater supply of deliverable and developable sites.
- 1.8 This is on the basis that, as set out in paragraph 14.7 of the Local Plan Development Strategy Topic Paper – Addendum (January 2024) there is a clear commitment to undertake an early review of the Plan that will investigate ways of meeting the housing need post 2034.

Issue 2: Five year housing land supply

Q2. Based on the latest housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

- 1.9 Berkeley Homes can confirm that, as they own the Turnden site (allocation AL/CRS 3), this could comprise part of the five year housing land supply whether permitted by the Secretary of State or allocated through the Local Plan with a subsequent permission.

Q.3 Where sites have been identified in the Plan, but do not yet have planning permission, or where major sites have only outline planning permission, is there clear evidence that housing completions will begin within five years?

- 1.10 Through the currently outstanding application for the Turnden site it has been demonstrated that it is deliverable. Berkeley Homes can confirm that if the current application for the Turnden site is permitted or allocated they will commence work as soon as practicable.
- 1.11 As a consequence of the current application, Berkeley Homes have full knowledge of the site and the issues affecting development. There is already a draft set of conditions and a S106 agreement in place. As such, there is nothing to delay delivery once permission is granted. If permission is not granted by the Secretary of State, but the allocation remains, a revised application could be submitted and determined within a year.
- 1.12 Given the position with the draft Plan, following the Inspector’s initial findings, and the Council’s and government’s desire to have a Local Plan adopted as soon as possible, it is more important than ever that the sites allocated in the draft Plan can and will be delivered as soon as practicable.
- 1.13 Given the advanced state of the application proposals for the Turnden site, this must be one of the more secure options in the draft Local Plan for delivering new homes.