

Examination of the Tunbridge Wells Borough Local Plan

Statement on behalf of Taylor Wimpey UK Ltd

**Matter 3 – Spatial Strategy and Distribution of Development
(Policy STR1, STR3, STR9 and STR10)**

March 2022

Turley

Contents

1.	Introduction	3
2.	Response to Issues and Questions for Matter 3 – Spatial Strategy and Distribution of Development (Policy STR1, STR3, STR9 and STR10)	4

Ryan Johnson
ryan.johnson@turley.co.uk

Client

Taylor Wimpey UK Ltd

Our reference

TAYS3041

March 2022

1. Introduction

- 1.1 This statement is submitted on behalf of Taylor Wimpey UK Ltd for purposes of the Examination of the Tunbridge Wells Borough Local Plan.
- 1.2 The statement responds to the Inspectors' Issues and Questions for Matter 3 – Spatial Strategy and Distribution of Development (Policy STR1, STR3, STR9 and STR10).
- 1.3 The concerns outlined by our client at the Regulation 19 stage (letter to TMBC dated 25th May 2021), on issues pertaining to the plan's legal compliance and soundness, have not been overcome thus far. If anything, the documents published by the Council for submission purposes only serve to highlight the deficiencies evident in the production of the plan now submitted.
- 1.4 Accordingly, we have examined the Inspector's questions for Matter 3 and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

2. Response to Issues and Questions for Matter 3 – Spatial Strategy and Distribution of Development (Policy STR1, STR3, STR9 and STR10)

Issue 1 – Spatial Strategy

Question 5. The Development Strategy also supports the “...creation of a new garden settlement: Tudeley Village...”. What were the reasons for pursuing a new, standalone settlement, rather than the expansion of existing towns and villages? Is this justified?

- 2.1 National guidance [Paragraph: 010 Reference ID: 2a-010-20201216 (NPPG, 2020)] states that the housing requirement ‘...will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).’
- 2.2 As outlined in our Matter 2 Statement, we are concerned that the housing requirement deduced as the base for the Local Plan has not been positively prepared, or informed by a robust SA process that aligns with the SEA Regulations. Taking this our as position, we have sought to examine the spatial strategy justification for directing nearly 70% of the boroughs housing provision to two strategic sites, in close proximity to each other, in one part of the borough. The decision to do so has a significant impact on the quantum of growth to distribute to other settlements in the borough, in pursuit of meeting needs where they arise, and for delivering the sustainability objectives of the Local Plan more widely.
- 2.3 The proposed garden village of Tudeley is of a scale that seems unlikely to be wholly self-sustainable within the plan period, and will consequently rely to an extent on Paddock Wood, Tonbridge and other locations for some services, facilities and employment for the foreseeable future. Paragraph 5.221 of the Submission Local Plan confirms that a new rail station will not be delivered alongside these proposals within the plan period, and there is no evidence tabled to suggest such a proposal is deliverable at all at this time. This is a significant unknown and a negative for a location and proposal such as this, leaving homes and employees indefinitely without access to rail, unless they travel toward Paddock Wood or Tonbridge to access this. Significant strategic road infrastructure and junction improvements are instead proposed to service this proposal, alongside and near the strategic site proposed at Paddock Wood. It is not clear therefore how this serves to reduce ‘*the need to travel, especially by car*’, a key sustainability and climate change objective under Policy STR7 of the Local Plan. Therefore, we would question the justification for Policy STR/SS3 as an effective policy that aligns with STR 7 and the Council’s stated climate change emergency plans.
- 2.4 Secondly, it is also important to examine the spatial strategy implications of relying on so much growth being delivered in one geography of the borough. As outlined at pages 15-19 of our Regulation 19 representations, we point to evidence to suggest the quantum of growth envisaged at the two strategic sites, in such proximity, are unlikely

to be delivered as fast as the Council envisage, and as a result are unlikely to be delivered wholly within the plan period.

- 2.5 As Table 9 of the Housing Supply and Trajectory Topic Paper (TWBC, 2021) illustrates, both sites are envisaged to be delivering at full annual production rates (300pa & 150pa) three years post anticipated adoption of the Local Plan in year 2022/23. We outline and will elaborate at Matter 9, that the lead-in time for such large strategic sites, particularly the infrastructure lead in alone, has been significantly over-estimated; and importantly runs contrary to the latest version of the evidence referenced by the Council¹.
- 2.6 In addition, very little if any evidence is presented on the implications for absorption rates for two strategic sites of this scale so close together. A significant amount of infrastructure disruption is likely given the scale of the projects and their proximity to each other. Existing local housing market delivery, coupled with two large strategic sites being delivered at the same time will inevitably influence market absorption rates. Further work is advised on this given how critical the delivery path and rates for these two sites are to the Council's Development Strategy.
- 2.7 Given the proportion of supply these two strategic sites contribute to total housing land supply, it is essential that lead-in times and delivery rates are realistic and justified by evidence. It is equally important that sufficient contingency is built into the housing land supply to account for slower delivery rates and yields, particularly in the first five years of the plan period.
- 2.8 Suffice to say we suggest there are spatial strategy implications for the Local Plan that flow from this, if, as we contend, the lead-in time for such strategic sites need to be modified to be more realistic; and corresponding shortfalls need to be distributed to the rest of the borough. This includes the need to reassess the contribution more sustainable settlements could make in the early phases of the plan period, having regard to the Council's Settlement Role and Function Study. Not just to compensate for the shortfall from the two strategic sites within the plan period, but as we set out in our Matter 2 Statement, to also determine whether any further contribution could be made to meeting the uncapped housing needs of the area, particularly for affordable housing, and the unmet needs of adjoining LPAs. This would provide an opportunity to explore a more balanced housing distribution strategy across the borough that fosters more sustainable patterns of movement; and one that importantly helps maintain a rolling five-year supply of land for housing. We note that housing land supply issues are to be explored in more detail under Matter 9 of this examination, so we defer to that session to elaborate on such matters.

¹ *Start to Finish What factors affect the build-out rates of large-scale housing sites?* SECOND EDITION (Lichfields, 2020)

Issue 2 – Distribution of Development

Q1. How was the distribution of development established? Has the Council sought to direct housing growth towards settlements based on their scoring in the Settlement Role and Function Study, or by another means?

- 2.9 Whilst there are many factors the Council should rightly consider in assessing and selecting an appropriate distribution strategy, the sustainability credentials of the settlement, and the role and function it plays to the local and wider area are clearly key factors. As outlined at page 19-20 of our Regulation 19 representations, there are instances where perhaps this has not been given sufficient weight in distribution options, which may well run contrary to the climate change objectives in Policy STR7.
- 2.10 Table 5 of the Settlement Role and Function Study (TWBC, 2021) for example, ranks the settlement of Horsmonden as 12th out of 21 settlements assessed for their sustainability and appropriateness to accommodate further growth. This is in recognition of the fact it is a small rural settlement with very few local services and facilities. Yet the level of growth (320 homes) proposed to this rural settlement under Policy PSTR/HO 1 rivals that proposed at Cranbrook (429 homes), which is ranked second only after Southborough. The level of growth proposed at Horsmonden is therefore out of kilter with the conclusions of the Settlement Role and Function Study (TWBC, 2021). The paucity of local services and facilities is likely to increase the need to travel by car, leading to unsustainable travel patterns that run contrary to Policy STR 7. We would suggest growth at this settlement is reduced to address local needs only, commensurate with local services and facilities.
- 2.11 Any deficit should be directed to more sustainable settlements, such as Cranbrook. As we outline at paragraphs 2.12-2.15 of our Matter 2 Statement, the level of growth directed to Cranbrook was halved between Draft Local Plan and Submission Local Plan stages, despite corresponding Sustainability Appraisals indicating this level of growth was justified in the Draft Local Plan. Whilst we accept further analysis may have resulted in the need to delete particular sites, there were / are in our view modest reasonable alternative sites that could have been revisited to ensure sustainable settlements like this contribute more to meeting needs in a sustainable manner, particularly in the first five years of the plan period. This includes sites that score better in the submitted SA (TWBC, 2021), than some of those deleted and indeed proposed for allocation (i.e. Site 25).
- 2.12 We elaborate further on this in our Matter 5 Statement, in relation to the site selection methodology deployed by the Council in support of their distribution strategy.

-End-