

Tunbridge Wells Borough Local Plan Examination

**Hearing Statement prepared on behalf of the Hadlow Estate (hereafter referred to as “The Estate”)
Matter 8 – Meeting Housing Needs**

Issue 1 – Housing Requirement and Meeting Housing Needs

Q4. Does the Plan identify specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan? If not, how many years’ worth of supply does it identify?

The Updated Local Plan Trajectory (Document PS_062) includes the following table:

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	518	636	842	736	758	1049	798	926	707	663	614	567	523	255	182	230	241
Cumulative Projected Housing Completions	688	1206	1842	2684	3420	4178	5227	6025	6951	7658	8321	8935	9502	10025	10280	10462	10692	10933
Housing Target	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667
Cumulative Housing Target	667	1334	2001	2668	3335	4002	4669	5336	6003	6670	7337	8004	8671	9338	10005	10672	11339	12006

This table confirms that the Plan will provide sufficient supply only until Year 15 (2034/35). From Year 16 onwards there is an under supply against the Cumulative Housing Target. Assuming the Plan is adopted in Year 5 (2024/25), the Plan would only provide a maximum of 10 years of supply.

The Plan does identify specific, developable sites for growth for years 6-10. It does not identify specific, developable sites or any broad locations for growth for years 11-15 of the Plan despite this being possible to do.

Q5. As modified, would the Plan be positively prepared? Would it provide a strategy, which, as a minimum, seeks to meet the area’s objectively assessed needs?

NPPF (Sept 2023) Para 23 defines positively prepared as:

“Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹”

NPPF Footnote 21 states:

“Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.”

NPPF Paragraph 61 states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”

NPPF Paragraph 22 states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” (emphasis added)

Paragraph 22 goes on to state:

“Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

Given that the Plan only provides a maximum of 10 years of housing land supply from adoption, particularly when the opportunity is available to achieve the minimum requirement as set out in the NPPF by including the Tudeley Village allocation, the Plan is not positively prepared or sound but can be rendered so by the Tudeley Village allocation.

Q6. If not, how could the Plan be modified to make it sound?

The Plan can be made sound by including Tudeley Village as part of the overall development strategy for the Borough. Tudeley Village provides a sustainable location for the delivery of a high quality, sustainable new community. The evidence base demonstrates that there are no planning barriers to the delivery of Tudeley Village, as well as confirming there are no alternative sites to meet the shortfall in housing arising from the removal of Tudeley Village.

The Plan can be made sound by making the following amendments:

- Amending Policy STR 1 such that it reverts to including the requirement for *“the development of two strategic sites”* and *“the creation of a new garden settlement: Tudeley Garden Village between Paddock Wood and Tonbridge”*; and
- Retaining Policy STR/SS 3 which is proposed to be removed as part of the Main Modifications.

This approach aligns with Option 2 set out in the Development Strategy Topic Paper (PS_054) for which the Authority provides the following commentary:

*“10.11 This option recognises the sequential test issue highlighted by the Inspector in relation to housing growth at Paddock Wood and east Capel (with no housing proposed in Flood Zones 2 or 3), while still promoting Tudeley Village, with a revised trajectory. **Of particular note, the reduction of c.1,000 dwellings covered by Policy STR/SS 1, even coupled with the deferral of construction at Tudeley Village, may (if the further work on housing need and supply set out below is accepted) have the clear merit of still providing 15 years’ supply of housing post adoption, albeit with a reduced/marginal buffer (SA Option number 19B)...***

Alternative Approach – Tudeley Village focused review of the Local Plan

Without prejudice to the positions set out above, if the Inspector were still not minded to include Tudeley Village in this Plan, it is essential that **Policy STR 1 is amended to specifically require the early review of the Local Plan to be focused upon the delivery of a new settlement at Tudeley** given all of the evidence and work done to date which confirms this as the appropriate solution.

The wording to Policy STR1 would therefore be amended as follows:

Following adoption, the Council will undertake an early review of the Local Plan, which will focus on the creation of a new garden settlement at Tudeley Garden Village between Paddock Wood and Tonbridge to meet identified housing needs for the period post 2034. Development at Tudeley Garden Village will be supported in principle, subject to the conclusions of any early plan review conducted within the next two years, and that policy support will be treated as forming part of very special circumstances for the consideration of such development proposals, in the absence of any early review concluding within two years of the adoption of the Plan.

The reasoned text should explain that conclusion reflecting, in particular, the Council's stated position in paragraph 3.78 of its own Local Plan Development Strategy Topic Paper – Addendum (December 2023), and so be to the following effect:

Tudeley Garden Village was withdrawn from allocation in the Local Plan Process to allow for further consideration about it. However, the Council found from the review of Green Belt alternative sites that those do not suggest any more appropriate site allocations that would provide any meaningful quantum of housing supply. Also, the Council is confident in its SHELAA site assessments and its site selection methodology generally. The Local Plan is only meeting housing needs for the next 10 years and has to be subject to an early review. In light of all the findings on the evidence, the early plan review should therefore focus on the principle of creating a new garden settlement at Tudeley Garden Village given the absence of any other more appropriate site allocations to provide a meaningful quantum of housing supply to address the Council's identified needs after the first 10 years of the Plan.