



**Examination Statement – Matter 8**  
**Meeting Housing Needs**  
**Tunbridge Wells Local Plan Examination**  
**Stage 3**

**Representations on behalf of Crest Nicholson**

**May 2024**

On behalf of **Crest Nicholson**

## Document Control Sheet

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Tunbridge Wells Local Plan Examination Stage 3

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	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>
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## 1 Introduction

- 1.1 This Statement has been prepared by Stantec on behalf of our Client, Crest Nicholson, who has an interest in the land to the north west of Paddock Wood that forms a significant part of the housing allocation STR/SS1: The Strategy for Paddock Wood, including land east of Capel. This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.3 This Statement does not respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.4 These representations have been considered in the context of the tests of 'soundness' as set out at paragraph 35 of the NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

## 2 Response to Matter 8 – 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.***

2.1 To reflect the revised TWBC development strategy, the Council's Proposed Modifications published in January 2024, suggest Policy STR 1 - The Development Strategy be amended to state:

*“The broad development strategy for Tunbridge Wells borough over the period 2020-2038... is to ensure that a minimum of 12,006 dwellings... are developed...”*

*Following adoption, the Council will undertake an early review of the Local Plan which will include further investigation of ways of meeting identified housing needs for the period post 2034”*

2.2 As shown in the Updated Local Plan Housing Trajectory, however, the plan can only deliver sufficient housing to meet the needs up to 2034/35. Based on an annual local housing need of 667 dwellings, this equates to 10,005 dwellings. The trajectory shows provision of 10,280 dwellings.

2.3 In our statement to Matter 1, Issue 3 – Proposed Strategy and Early Review, Crest suggested a further amendment to Policy STR1 to address the matter of an early review of the local plan to address housing need post 2034.

2.4 In order for Policy STR 1 to be clear and effective with regard to the Plan period and housing requirement within that time period, Crest also suggests that the time period stated in the first paragraph of Policy STR1 is amended to “2020/21 – 2034/35” and that the minimum housing requirement is set at 10,005 dwellings.

### **Suggested Change to Policy STR1**

- 2.5 It is suggested to be clear and effective that the Proposed Modification, published in January 2024, to Policy STR 1 - The Development Strategy be further amended to state, in the first and final paragraph:

*“The broad development strategy for Tunbridge Wells borough over the period 2020- 2035, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 10,005 dwellings and 14 hectares of employment (use classes B and E) land are developed, together with supporting infrastructure and services... “*

*Following adoption, the Council will bring forward a partial update of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. The review will commence immediately upon the adoption of this Plan with submission of the review for examination within 28 months. Specific matters to be addressed by the update shall include the following (amongst all other matters that need to be assessed and taken into account for the purposes of plan preparation):...”*

### **Q2. What Main Modifications are required to the housing trajectory and projected sources of supply as a consequence of the Council’s suggested changes to the Plan? Are the suggested changes based on accurate and up-to-date information?**

- 2.6 We understand the Council is reviewing the housing trajectory in light of recent discussions:
- with Crest and Dandara regarding the effect of the Revised Strategy for the reduced number of dwellings under STR/SS1 and delays in the progress of the Local Plan
  - with Redrow and Persimmon and the delay in the determination of the applications on land east of Paddock Wood.
- 2.7 We also expect the Council to provide a general update to reflect progress of other allocations, some of which have been approved, have a resolution to grant or are subject to current applications. This information has yet to be published, and as such, Crest reserves its position to respond further on this matter at the Examination.

***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?***

2.8 Whilst the plan is now only looking to deliver for the period to 2035, i.e. 10 years from adoption, it would in our opinion still deliver specific, developable sites for years 6-10 given the proposed allocations.

2.9 The Suggested Change to Policy STR1, set out in paragraph 2.5 of this statement would help address this issue for years 11-15.

***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?***

2.10 We believe the plan as modified, along with Crest's Suggested Changes to Policy STR1, does provide a strategy to meet the areas objectively assessed need, as a minimum.

## **Issue 2 – Five Year Housing Land Supply**

2.11 Crest is aware that the Council is updating its five year housing land supply. As such, Crest reserves its position to respond further on this matter at the Examination.