
Examination Statement – Matter 9 Housing Land Supply

Tunbridge Wells Local Plan

Representations on behalf of Crest Nicholson

May 2022

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore now 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, which provides for circa 3,490-3,590 new dwellings across Paddock Wood. This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 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).
- 1.4 These representations respond to the Inspectors' questions within Matter 9 – Housing Land Supply. 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.
- 1.5 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.

2.0 RESPONSE TO MATTER 9 – HOUSING LAND SUPPLY

Issue 1 – Total Housing Supply

Question 1: How has the housing trajectory in Figure 9 of the Plan been established? What factors were considered in arriving at the figures in the trajectory and are they accurate and robust?

Issue 2 – Five Year Housing Land Supply

Question 6: How have the projected rates of housing delivery been established for the strategic sites at Tudeley Village and Paddock Wood and East Capel? Are the figures realistic when taking into account the need for supporting infrastructure?

- 2.1 The Council's Housing Supply and Trajectory Topic Paper (February 2021) sets out a robust approach to considering housing supply and trajectory of new build houses.
- 2.2 The Council has also had discussions with developers and housebuilders, incorporating their experience. This is set out in the housing trajectory in the Statement of Common Ground between TWBC and Crest. Whilst this is a refinement, the trajectory for the whole STR/SS1 site remains the same as set out in the Housing Supply and Trajectory Topic Paper.
- 2.3 The figures in the Statement of Common Ground provided by Crest are based on its experience of bringing forward similar sized sites in similar markets. This along with the experience of the other major housebuilders (Dandara, Redrow and Persimmon) makes the assumptions made for STR/SS1 robust. All developers have been working together with the Council as part of a wider Developer Group and are continuing to do so to ensure delivery of much needed housing.
- 2.4 The figures provided in the tables will depend on a number of factors, including when the Plan is adopted. This is particularly an issue for those sites that are currently in the Green Belt and need to be removed by the adoption of the Plan.
- 2.5 This will not prevent Crest from collaborating with the Council in the meantime to prepare the SPD and have pre-application discussions. A PPA for this work is currently being drafted. Although Crest are working at risk, this will ensure minimal delay.

- 2.6 On large sites, such as STR/SS1, there clearly is a period of preparation but this is balanced by the number of housebuilders/outlets that will be constructing on site STR/SS1 once work starts. The number of new homes being built quickly reaches a large optimum number which can then be sustained until completion. As such, the numbers in Table 9 of the Housing Supply and Trajectory Topic Paper whilst not reflecting the true anticipated numbers year on year, do provide an accurate start date of 2025/26 and an average annual completion, which provides the requisite information for five year housing land supply and the total Local Plan period. Individual trajectories for each of the developer parcels of STR/SS1 are provided in the relevant Statements of Common Ground.
- 2.7 This issue is also related to a number of policies in the Local Plan, and all need to provide sufficient flexibility to minimise delays in delivery over the Plan period, particularly in the earlier years, to ensure the Council has a rolling five year housing land supply and that the housing need and trajectory is met in full within the Plan period.
- 2.8 As one of the developers of the Paddock Wood allocation STR/SS1, Crest recognises the benefits of strategic site allocations and is keen to ensure development is planned for comprehensively. Crest believes this will be achieved via the policy mechanisms put forward by the Council – the Masterplan and the Development Framework SPDs. A slightly more flexible approach is required to be set out in the Local Plan, however, to recognise that strategic sites do take longer to plan for and start delivering new homes, so as set out in other Hearing Statements, it is important that the Local Plan:
- Recognises that development will be brought forward in a variety of planning applications by different developers and not unduly restrict or delay development coming forward that is in general conformity with a co-produced Strategic Site Masterplan and Development Framework (see Matter 6 Issue 3 Hearing Statement)
 - Sets out clearly and concisely what is required of each allocation, and parcel therein (see Matter 6 Issues 1 & 3 Hearing Statement)
 - Evidences and clearly sets out what is fair and reasonable infrastructure required to be provided and by which development parcel, subject to viability (see Matter 6 Issue 3 Hearing Statement)
 - Minimises repetition and confusion overall, as the Plan will be read as a whole.