

Wiltshire Local Plan Review – Examination in Public

Note: Example of a potential Main Modification introducing clause to require early Plan review
13th November 2025

- 1.1. This note has been prepared by Wiltshire Council as part of the examination of the Wiltshire Local Plan review (the Plan) in response to a request from the Inspectors during the examination hearing session on Matter 2, Issue 1, on Wednesday 12th November.
- 1.2. During this session, discussion was held around the potential for a Main Modification to the Plan to make provision for a prompt review of the Plan following its adoption. The council made reference to the Tunbridge Wells Borough Local Plan (TWBLP) examination and the Inspectors invited a note on that plan.
- 1.3. In the TWBLP examination, the Inspectors found an early review to be a sound way forward. Relevant excerpts from the Report on the Examination of the TWBLP¹ and Schedule of Main Modifications² (14th October 2025) are included at Appendix 1 and Appendix 2 to this note.
- 1.4. The TWBLP Inspector's findings in relation to housing supply within the TWBLP plan period can be found at paragraphs 319-329 of the Inspector's report. It is clear in this case that the Inspector took a pragmatic approach in making a series of Main Modifications (including MM3, MM15, MM16, MM254) to introduce an 'early review' clause which commit the council to publishing an update to its Local Development Scheme following adoption of the TWBLP which will set a timetable for an early review of the TWBLP. The early review is to commence within six months of adoption, and the LDS is to provide an indicative timescale for submission of the updated TWBLP, to take place within a set timeframe.

¹ Full document available at:

https://tunbridgewells.gov.uk/_data/assets/pdf_file/0009/509589/Inspectors-Report-FINAL.pdf

² Full document available at:

https://tunbridgewells.gov.uk/_data/assets/pdf_file/0010/509590/Appendix-to-Inspectors-Final-Report.pdf

Appendix 1:
Relevant excerpt from the Report on the Examination of the Tunbridge Wells
Borough Local Plan

Issue 6 – Whether the policies and allocations in the Plan will be effective in ensuring that the housing requirement will be met, and whether there will be a five-year supply of deliverable housing sites on adoption

Total Housing Land Supply

319. The annual housing requirement is 678 houses per year. When applied across the plan period, this gives a total requirement of **12,204** new homes (2020-2038).

320. In advance of the Stage 3 hearing sessions, the Council's Matter 8 Statement set out an updated housing trajectory. Based on the suggested changes to the Plan (notably the deletion of Tudeley Village and alterations at Paddock Wood), the Council could only identify land sufficient for **10,983** dwellings.

321. An update was provided in December 2024 and was published alongside the consultation on the MMs. This showed a slight improvement to **11,026** units. Both figures fall short of the minimum housing requirement for the plan period. Paragraph 35 of the Framework states that, amongst other things, Plans are sound if they are positively prepared. This means providing a strategy which, as a minimum, seeks to meet an area's objectively assessed needs.

322. One way of addressing this shortfall would have been to pause the examination further and look to allocate more sites. However, there are several reasons for recommending that the Plan is adopted without seeking to allocate more land now.

323. Firstly, in identifying a sufficient supply of housing sites, paragraph 68 of the Framework requires planning policies to identify a) specific, deliverable sites for years 1 to 5 of the plan period, and b) specific, developable sites or broad locations for growth for years 6-10, and where possible, years 11-15. In this case, the updated trajectory identifies specific, developable sites which have been updated throughout the examination process. For the first 10 years of the plan period, total completions are expected to exceed the housing requirement. In the 10 years following adoption (2025-2035), housing completions are also broadly consistent with the housing requirement (**10,143** against a requirement for **10,170** new homes). The Plan therefore provides a healthy supply of housing land up to approximately 2035. This is because whilst Tudeley Village has been deleted, it was not expected to start delivering a significant amount of new housing until the latter stages of the plan period and beyond.

324. Secondly, as identified throughout this Report, Tunbridge Wells is heavily constrained, with large areas of Green Belt and/or National Landscape


designations. Where Green Belt sites are concerned, boundaries can only be altered through the preparation or updating of the Local Plan. Finding additional sites to offset the loss of Tudeley Village would take time, during which, currently allocated sites would remain in the Green Belt. Housing needs exist now, and delaying adoption to find more sites for years 10-15 is only likely to exacerbate current housing needs, including current affordability in the borough.

325. Finally, I am also mindful that as part of the examination process, the Council has assessed options for housing around Royal Tunbridge Wells in detail. Beyond the Green Belt, towns such as Paddock Wood are also expected to grow significantly over the plan period, and major development is proposed in the High Weald National Landscape. The Council has given consideration to a range of alternatives, but no obvious candidates have been identified of a scale sufficient to replace Tudeley Village, either individually or cumulatively. As a result, there is no guarantee that pausing the examination would lead to the identification of enough suitable sites at this stage.
326. Instead, it is recommended that a more appropriate and effective way of meeting housing needs would be through the adoption of this Local Plan with a clear requirement for the Council to undertake an immediate review. This is achieved through modifications to the development strategy (Policy STR/SS1). To ensure that the Plan is justified and effective, **MM16** requires the Council to start work on a new Local Plan within six months of adoption, which shall include ways of meeting identified unmet housing needs. It then states that submission should occur within 30 months (2.5 years) from commencement of the early review. Consequential changes are made by **MM3** and **MM254**. The latter includes reference to monitoring for effectiveness.
327. As consulted upon, **MM3** and **MM16** state that the strategy provides a housing land supply for the first 10 years of the plan period (2020-2030). That is correct. However, the strategy provides a supply for approximately 10 years following the intended date of adoption (2025 up to 2035). I have rectified this factual position in the schedule of MMs in the Appendix to this Report.
328. It has been suggested that the review mechanism should refer to the reassessment of Tudeley Village by the Council. Conversely, it has also been suggested that the Council should explicitly preclude Tudeley Village from any future review. Neither are necessary for soundness. Instead, **MM15** is provided for effectiveness and states that the Council will consider all options for meeting future housing needs through a call for sites and SHELAA process. It is not the purpose of this examination to predetermine the Council's future strategy.
329. To reflect the latest evidence and bring the Plan up to date on adoption, **MM14** and **MM253** update the housing trajectory and associated tables for effectiveness.

Appendix 2:
Relevant excerpts from the Schedule of Main Modifications on the Tunbridge
Wells Borough Local Plan

Appendix – Schedule of Main Modifications

MM Ref.	Page	Policy/ Paragraph	Main Modification
MM1	14	Paragraphs 1.6 and 1.7	<p>Section 1: Introduction <i>Amend paragraphs 1.6 and 1.7 as follows:</i></p> <p><i>Paragraph 1.6</i></p> <p>The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 was originally adopted by Kent County Council in July 2016 and has been was subject to an Early Partial Review of certain waste management capacity requirement and mineral and waste safeguarding policies. The Plan was adopted in its modified form in September 2020. <u>A new KMWLP was adopted in 2025.</u></p> <p><i>Second sentence of paragraph 1.7</i></p> <p>... and the extension to Stonecastle Farm Quarry at Hadlow (adjoining <u>straddling</u> the borough boundary)), and those...</p>
MM2	14	Paragraphs 1.9 and 1.10	<p>Section 1: Neighbourhood Plans <i>Amend paragraphs 1.9 and 1.10 as follows:</i></p> <p><i>Paragraph 1.9</i></p> <p>At present, following a successful referendums in February 2018, there are is a <u>10</u> 'made' (i.e. approved) Hawkhurst <u>Neighbourhood Plans within Tunbridge Wells borough. Within these areas the respective Neighbourhood Plans form part of the Development Plan under which planning applications</u> against which development proposals within Hawkhurst parish are assessed.</p> <p><i>Paragraph 1.10</i></p> <p>Details of these se <u>Hawkhurst</u> Neighbourhood Plans <u>and others within the borough</u> can be found on the Council's website under Neighbourhood Plans.</p>
MM3	15	Figure 1 and paragraph 1.13	<p>Section 1: The Local Plan Process <i>Amend Figure 1 and paragraph 1.13 as follows:</i></p>

MM Ref.	Page	Policy/ Paragraph	Main Modification
			<p><i>Figure 1</i></p>  <pre> graph LR A[Issues and Options Consultation May/June 2017] --> B[Draft Local Plan Consultation September/November 2019] B --> C[Pre-Submission Local Plan Consultation March/June 2021 Submission for examination November 2021] C --> D[Examination Examination 2021 - 2025] D --> E[Adoption March - May 2025] </pre> <p><i>Paragraph 1.13:</i></p> <p>In accordance with national policy, which states that the strategic policies in a local plan must look ahead over a minimum 15-year period from the date of adoption, this Plan <u>period</u> runs from 2020 to 2038, following anticipated adoption in June 2022. <u>The Local Plan provides a housing supply for ten years following adoption, with any remaining needs to be planned for through an early review of the Local Plan, as set out in strategic policy STR 1 – The Development Strategy.</u></p>
MM4	16	Paragraph 1.19 and throughout Plan	<p>Section 1: Draft Local Plan</p> <p><i>In the third bullet point of paragraph 1.19 and for all subsequent references amend name of the High Weald Area of Outstanding Natural Beauty (AONB) as follows:</i></p> <p>the Plan's consistency with national policies in relation to the release of Green Belt land, as well as the number of major developments in the High Weald Area of Outstanding Natural Beauty (AONB) <u>National Landscape</u>, and its conservation;</p>

MM Ref.	Page	Policy/ Paragraph	Main Modification																
MM15	38 - 41	Paragraphs 4.47 and 4.49	<p>Section 4: Formulating the Development Strategy</p> <p><i>Insert new paragraphs and table, amend paragraphs 4.47 and 4.49 as follows:</i></p> <p><i>After paragraph 4.35 add</i></p> <p><u>A key evidence document is the Council's 'Settlement Role and Function Study'. This groups settlements in terms of their characteristics, focusing on the range of services and facilities they currently provide. These groupings are shown in NEW FIGURE (figure number to be confirmed ahead of adoption) below.</u></p> <p><u>NEW FIGURE (figure number to be confirmed ahead of adoption) Settlement groupings in the Role and Function Study (2021)</u></p> <table><tr><th><u>Grouping</u></th><th><u>Settlement</u></th></tr><tr><td><u>A</u></td><td><u>Royal Tunbridge Wells (RTW) *</u></td></tr><tr><td><u>B</u></td><td><u>Southborough*, Cranbrook, Paddock Wood and Hawkhurst</u></td></tr><tr><td><u>C</u></td><td><u>Rusthall and Pembury</u></td></tr><tr><td><u>D</u></td><td><u>Goudhurst, Langton Green, Benenden, Brenchley and Horsmonden</u></td></tr><tr><td><u>E</u></td><td><u>Lamberhurst, Speldhurst, Sandhurst, Five Oak Green, Sissinghurst and Bidborough</u></td></tr><tr><td><u>F</u></td><td><u>Matfield and Frittenden</u></td></tr><tr><td><u>G</u></td><td><u>Kilndown and Iden Green</u></td></tr></table>	<u>Grouping</u>	<u>Settlement</u>	<u>A</u>	<u>Royal Tunbridge Wells (RTW) *</u>	<u>B</u>	<u>Southborough*, Cranbrook, Paddock Wood and Hawkhurst</u>	<u>C</u>	<u>Rusthall and Pembury</u>	<u>D</u>	<u>Goudhurst, Langton Green, Benenden, Brenchley and Horsmonden</u>	<u>E</u>	<u>Lamberhurst, Speldhurst, Sandhurst, Five Oak Green, Sissinghurst and Bidborough</u>	<u>F</u>	<u>Matfield and Frittenden</u>	<u>G</u>	<u>Kilndown and Iden Green</u>
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		<p><u>*RTW and Southborough are also jointly considered as the main urban area</u></p> <p><u>While this gives an indication of the relative level of sustainability in terms of access to goods and services and the need to travel, it is only one of a number of factors to be considered in the selection of appropriate locations for new development; other factors to be taken into account include housing need, employment/economic factors, transport and infrastructure provision, landscape, historic and environmental considerations, and flooding issues. It is also important to note that the Study is a snapshot in time and that current services and facilities available in the settlements may be subject to change in the future.</u></p> <p><i>Delete paragraph 4.47</i></p> <p>Tudeley Village would involve the loss of a large area of Green Belt but is outside the AONB, is well located in terms of accessibility to nearby towns, would be of a scale that supports a good range of services, and can be planned in a holistic, comprehensive manner, achieving very high standards of sustainable design and development. Moreover, no sustainable option has been identified and, without this new settlement, the borough's housing need would not reasonably be capable of being met.</p> <p><i>Paragraph 4.49</i></p> <p>The development strategy retains the use and definition of Limits to Built Development (LBDs) around settlements, as 'policy lines'. <u>These do not define settlements as such, and there may be fringe areas as well as some smaller settlements and enclaves of development in the countryside, that are excluded in order to maintain the overall rural character of the locality and to focus growth in more sustainable locations.</u>, indicating where Proposed development would <u>within the LBD boundaries, such as for new housing and business, will</u> be acceptable in principle, subject to other Plan policies. <u>Outside of the LBDs,</u> and where a more restrictive approach <u>countryside policies apply. However, some development, such as that for farming, tourism, recreation, equestrianism, rural workers' dwellings, and affordable housing as provided for by specific polices in the Plan, may be</u> is appropriate, this is also set out in the policy. <u>Incorporated into the Local Plan are Site Layout Plans for each site allocation policy. These are indicative maps that provide an indication of how a site may come forward in line with the associated policy box.</u></p> <p><i>After paragraph 4.49 add the following new paragraphs</i></p> <p><u>Following the deletion of Tudeley Village, the adopted Local Plan does not provide for the full housing needs up to 2038. As such the Council is committed to an early review of the</u></p>
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MM Ref.	Page	Policy/ Paragraph	Main Modification
			<p><u>Plan to seek ways of meeting unmet housing needs in the later part of the Plan period. All other policies included in the Plan remain applicable for the entire plan period 2020-2038.</u></p> <p><u>As part of this early review the Council will identify and assess reasonable options for meeting unmet housing needs, and without prejudice to any decisions made about a future development strategy to meet this unmet need, will consider all reasonable sites put forward through a 'Call for Sites' and other land identified by the Council to be assessed as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) process.</u></p>
MM16	41 - 42	Policy STR 1	<p>Policy STR 1 The Development Strategy <i>Amend Policy STR1 as follows:</i></p> <p>The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 12,204 dwellings and 14 hectares of employment (Use Classes B and E) land are developed, together with supporting infrastructure and services.</p> <p><u>The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 12,204 dwellings and 14 hectares of employment (Use Classes B and E) land are developed, together with supporting infrastructure and services. The strategy of this plan provides for a housing supply for 10 years from the date of adoption including necessary supporting infrastructure, but with a requirement for an early review of the plan to include ways of meeting identified unmet needs.</u></p> <p>To achieve this, the Local Plan:</p> <ol style="list-style-type: none"> 1. Promotes the effective use of urban and previously developed (brownfield) land, having due regard to relevant Plan policies; 2. Looks to focus new development within the Limits to Built Development of settlements, as defined on the Policies Map, where proposals accord with other relevant policies of this Plan; 3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities, together with the <u>major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions</u> development of two strategic sites, namely: <p>a. major, transformational expansion of Paddock Wood (including land at east</p>

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			<p>Capel), following garden settlement principles and providing flood risk solutions; and b. the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge;</p> <p>4. Includes an allowance for potential delays or non-delivery of sites;</p> <p>5. Provides for a prestigious new business park to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21;</p> <p>6. Provides a framework for the preparation of a holistic Area Plan for Royal Tunbridge Wells Town Centre;</p> <p>7. Provides for some reductions in the area of the Green Belt, notably for <u>land in east Capel (adjacent to Paddock Wood) and</u> the strategic sites and around Royal Tunbridge Wells and Pembury, where exceptional circumstances warrant <u>release of land from the Green Belt</u> this, and where an effective long-term Green Belt is maintained;</p> <p>8. Limits development within the High Weald Area of Outstanding Natural Beauty <u>National Landscape</u> to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances are demonstrated;</p> <p>9. Normally limits development in the countryside (being defined as that outside the Limits to Built Development) to that which accords with specific policies of this Plan and/or that for which a rural location is fully demonstrated to be necessary.</p> <p><u>Early Review of the Local Plan</u></p> <p><u>Following adoption of the Local Plan, the Council will publish an update to its Local Development Scheme (LDS). This shall set out a timetable for an early review of the Local Plan, which shall commence within six months of adoption of the Local Plan. The LDS shall provide an indicative timescale for submission of an updated Local Plan for Examination, to take place no later than 30 months from commencement of the early review of the Local Plan. The Council shall then undertake the early review which shall include ways of meeting identified unmet housing needs.</u></p>
MM17	42 - 43	Table 4, Paragraphs 4.43, 4.47, 4.53, 4.54 and Table 5	<p>Section 4: Development Strategy</p> <p><i>Update Table 4, amend paragraphs 4.53 and 4.54 and update Table 5 as follows:</i></p> <p><i>Update Table 4: Distribution of housing allocations</i></p>

MM Ref.	Page	Policy/ Paragraph	Main Modification
			<p><i>Amend first sentence of paragraph 7.12</i></p> <p>To further support housing delivery, the Council has also prepared a 'Housing Delivery Test Action Plan' (2018/20192019/2020), in accordance with the provisions of the NPPF and related Planning Practice Guidance (for the latest version, see Monitoring Information).</p>
MM254	478	Paragraphs 7.20, 7.21, 7.22 and 7.25	<p>Section 7: Monitoring</p> <p><i>Amend paragraphs 7.20, 7.21, 7.22 and 7.25 as follows:</i></p> <p><i>Paragraph 7.20</i></p> <p>The trajectory of housing completions to meet the Local Plan target is reviewed and updated yearly and set housing monitoring is regularly undertaken specifically in relation to whether there is a continuing supply of housing land (for five years with an appropriate buffer) to meet development requirements (see the most recent Five Year Housing Land Supply Statement (2019/2020) for the latest Five Year Housing Land Supply Statement see Monitoring Information).</p> <p><i>Paragraph 7.21</i></p> <p>The Housing Delivery Test (HDT) has been introduced as a monitoring instrument to demonstrate whether local authorities are delivering sufficient homes to meet their housing need. The HDT, which was introduced in November 2018, compares the number of new homes delivered over the previous three years with the authority's housing requirement, and measures housing delivery rather than monitoring the supply of land available for housing. The results from the HDT will be used to determine the buffer that should be applied in local housing supply calculations and whether the presumption in favour of sustainable development should apply (a 20% buffer is applied to the Council's Five-Year Housing Land Supply housing target if delivery falls below 85% of the HDT requirement) in addition to the requirement for an action plan.</p> <p><i>Second sentence of paragraph 7.22</i></p> <p>As a matter of good practice, it is recommended that local authorities produce Action Plans regardless of their HDT result in order to identify processes to exceed housing requirements and support future housing delivery within an area (for the latest version see Monitoring Information).</p> <p><i>Paragraph 7.25</i></p>

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			<p>At this point, it is anticipated that at least the development strategy and place shaping policies will need to be reviewed five years after adoption of the Local Plan. <u>In this instance, the Development Strategy in this Local Plan provides sufficient sites to meet a 10-year rather than a 15-year housing land supply, and as such the Council is committed to undertaking and early review of the Local Plan. This is explained in more detail at Policy STR 1 The Development Strategy.</u></p>