

Home Builders Federation

Matter 8

Tunbridge Wells Local Plan – Stage 3 Hearings

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?

Planning Practice Guidance allows LPAs to rely on the local housing needs assessment for two years from the date on which the plan is submitted and should be revised where appropriate. The Tunbridge Wells Local Plan was submitted over 2 years ago in November 2021. Using the most recent affordability data and using household growth figures from the current year the local housing needs assessment using the standard method is 660 dpa capped and 725 dpa uncapped. Given that the housing requirement is marginally higher than the most recent local housing needs assessment the housing requirement of 678 dpa in the submitted plan remains sound.

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?

For council.

Q3. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?

No comment.



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 plan identifies developable sites that will deliver in years 6 to 10 and 11-13 post adoption, should the plan be adopted later this year. No allocations appear to deliver beyond the end of the plan period if the plan were to include a policy compliant plan period which looks forward 15 years from the point of adoption. From years 11 to 13 post adoption just 196 homes of the 653 homes to be delivered are expected to come forward on developable sites with the remaining homes to be delivered during this period expected to come forward on windfall. This is 1,381 homes short of housing needs in years 11 to 13 post adoption.

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?

No. The plan identifies supply to deliver 10,933 homes over the whole plan period, 1,073 homes short of what is needed based on the amended housing requirement and 1,271 homes short of the level of supply in the submitted local plan. The Council have said that they will undertake early review in order to identify supply later in the plan period. The HBF do not consider statements on early reviews to be effective with the majority of local authorities promising early reviews failing to deliver against such policies. The only review the HBF are aware of that has delivered an updated local plan within timescales is Bedford (policy attached in Appendix 1). This plan was adopted on the basis of a 10-year plan period with the review stating that the plan would be considered out of date if a replacement plan was not submitted within three years of the plan being adopted.

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

The plan must allocate additional sites that ensure housing needs are met in full over a policy compliant plan period that looks ahead for at least 15 years post adoption.

However, if the inspector concludes that this is not possible then the review policy must be more robust setting out when a new plan is expected to be submitted and that should the council not meet this objective the plan will be considered out of date. This would provide some incentive for the council as from this point they would then not benefit from the

provision in paragraph 76 the 2023 NPPF that removes the requirement for Council's to identify and update annually its five-year housing land supply.

Issue 2 – Five-Year Housing Land Supply

Q1. What will be the five-year housing land requirement upon adoption of the Plan?

This will depend on the annual requirement that is considered to be sound. In addition, whilst the plan is being examined under the transitional arrangements the latest NPPF removes the need to adopt a 5% buffer in supply. We also note that the Council are using the Sedgefield approach is assessing shortfall and the Liverpool method for assessing surplus. This was not clear in the Topic Paper and the HBF assumed that the Liverpool method would be used in both circumstances. However, it must be noted that the NPPF and PPG are both silent on how surplus should be treated, and that at appeal some inspectors have not allowed any surplus to be carried forward into the five-year land supply assessment from previous years.

On the basis of 678 dpa as submitted the five-year housing requirement, with a 5% buffer and surplus applied using the Liverpool approach the total requirement on adoption in 2024/25 would be 3,570. At 667 dpa it would be 3,496 homes. At 660 dpa it would be 3,449.

Q2. Based on the latest housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

For council.

Q3. Where sites have been identified in the Plan, but do not yet have planning permission, or where major sites have only outline planning permission, is there clear evidence that housing completions will begin within five years?

No comment.

Q4. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward as expected in the first five years?

No comment.

Q5. Will there be a five-year supply upon adoption of the Plan? If not, is the Plan sound?

No comment.

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Appendix 1: Bedford Local Plan 2030 – Review policy

Bedford Borough Local Plan 2030

The National Planning Policy Framework (NPPF)

1.7 The revised NPPF was published just before the Local Plan 2030. The revised NPPF provides transitional arrangements for plans in their latter stages of preparation and this means the Local Plan 2030 has been examined against the 2012 NPPF. For this reason, references within the local plan are to the 2012 NPPF.

Reviewing Local Plan 2030

1.8 Due to the changes to national planning policy, in particular the need for the borough to plan for higher housing numbers beyond this local plan, the Council will undertake an early review of the local plan. Significant infrastructure proposals such as the A428 road link between the Black Cat roundabout on the A1 and Caxton Gibbet, the redesign and reconstruction of the A421/A1 junction itself, the A421 expressway, East/West rail link and potential A1 north/south realignment between the A1/A14 intersection and south of Biggleswade will bring very significant change and potentially new and better connected development opportunities both within and beyond the borough.

1.9 The government is currently exploring prospects for strategic growth within the Oxford-Cambridge Arc. The local plan review will provide the opportunity to reflect those decisions with future housing and employment growth aligned with infrastructure delivery timetables. Working with nearby authorities either through the duty to cooperate or jointly on cross boundary strategic plans the Council will seek to deliver sustainable solutions to the challenge of increasing housing delivery.

1.10 The local plan review may also provide the opportunity for the Council to make site allocations in the rural part of the borough if neighbourhood plans have failed to deliver them in the timescale anticipated (see Policy 4S).

Policy 1 - Reviewing the Local Plan 2030

The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.

The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.