

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.

1.1 Whilst policy STR 1 - The Development Strategy advises that the broad development strategy for the borough over the period 2020-2038, is to ensure that a minimum of 12,006 dwellings are delivered, the plan only delivers sufficient housing to meet the needs to 2034/35 i.e. 10,005 dwellings¹ based on an annual local housing need of 667 dwellings.

1.2 Whilst we believe the annual housing requirement remains justified, we leave the council to respond on the matter of the plan period. That said, in order for policy STR 1 to be clear and effective we would suggest the plan period is actually amended to 2020/21 – 2034/35 and that the minimum housing requirement is set at 10,005 dwellings. Thus, policy STR 1 would start with: *‘The broad development strategy for Tunbridge Wells borough over the period 2020/21-2034/35, 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.’*

1.3 Subject to this amendment the real issue is does the plan as now proposed meet the housing needs of the borough for the next 10 years given the proposed buffer and housing trajectory, and if not, how can this be addressed.

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?

2.1 Whilst we understand the Council are reviewing the housing trajectory in light of recent discussions we have had with them about the effect of the delays in the determination of the land east of Paddock Wood on the proposed trajectory, and at the same time are reviewing the time horizon of other allocations, some of which have been approved, have a resolution to grant or are subject to current applications, it may well be that given the under supply to date² and the lead in times for the land at PWeC, that despite their position on the 5 year housing Land Supply (HLS) (see issue 2 question 5 below) and the fact this is now only a 10 year plan, the council look in this instance to adopt a stepped trajectory, with for example policy STR 1 added to, to explain that the 10,005 new residential dwellings (net) to be built in the borough over the period 2020/21 – 2034/35 will be delivered at an annual average rate of 625 dwellings per year to 2024/5, followed by 675 dwellings per year to 2029/30 and then 701 dwellings per year to 2034/35.

2.2 Whilst we would not normally advocate such an approach, the position as it has evolved at Tunbridge Wells and the reliance on strategic sites which will not start to deliver until the later part of the plan period, would in this instance appear to support a stepped

¹ 667 x 15 = 10,005

² PS_054-Development-Strategy-Topic-Paper-Addendum confirms that 1,842 completions occurred during the 3 year period 2020-2023 against a requirement for 2,001.

trajectory. The alternative being to delay the plan to facilitate further allocations which could put the council at risk of speculative applications in the light of the current housing land supply shortfall and further delays in the delivery of the strategic sites.

2.3 We would however like to reserve the right to respond further on this matter at the examination given the work we understand the council to be undertaking at present.

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

3.1 Whilst we note appendix c of PS_054 includes an updated Table 3: Housing Need and Supply 2020-2038, and that this includes a windfall allowance of 1,464 for small sites at 1 April 2023 (to 2038), and a windfall allowance of 360 for large urban sites at 1 April 2023 (to 2038), the former being higher than that promoted in the Submission Local Plan³; we also note that section 11 of PS_054 looks to justify this based on past trends, and leave the council to address this point.

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?

4.1 Whilst the plan is now only looking to deliver for the period to 2034/35, i.e. 10 years from adoption, it would in our opinion still deliver specific, developable sites for years 6-10 given the proposed allocations. The issue really is years 11-15, as whilst the plan overall looks to deliver 15 years' worth of LHN from 2020/21 to 2034/35, the time horizon from adoption is such that with the exception of the residual units at PWeC (circa 170 dwellings based on current trajectories, nothing else is identified in terms of specific, developable sites or broad locations for growth beyond 2034/35. The suggested plan review policy set out in our reps on matter 1 issue 3 could help address this without prejudging potential sites/ the future of the land at Tudeley.

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?

5.1 We believe the plan as modified does try to meet the areas OAHN/ the LHN for a 15 year period from 2020/21 to 2034/35, but with little room for manoeuvre, the proposed surplus of 275 dwellings leaving the plan very vulnerable should there be any delay in the delivery of sites/ non delivery of sites.

5.2 The above begs the question, should the council have done more to look to address this by way of additional allocations, or can, in the light of the clear need for the plan to be adopted to help facilitate housing deliver, a more nuanced approach be taken by way of a stepped trajectory/ the use of Liverpool rather than Sedgefield/ an early review mechanism. None are options we would normally promote and Liverpool will probably not be justified/ assist in this instance, but given the time it has taken to get the plan to this point, and the potential delays inherent in further consultation on additional allocations, we do wonder

³ The Submission Plan includes a windfall allowance of 1,310 for small sites and 360 for large urban sites.

whether, in this instance, it would be best to look to alternatives rather than stall the plan still further.

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

6.1 See above.

Issue 2 – Five-Year Housing Land Supply

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

1.1 Assuming the plan is adopted late 2024/ early 2025, the five year period from adoption would be April 2025 – March 30, which taking our response to question 5 below, would, given completions to date, expected completions in 23/24 and 24/25⁴, the surplus/ shortfall, and annualised requirement, lead to a Total Five-Year requirement of 3,412 / 682.5 dpa.

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?

2.1 PS_062 suggests that for the period following adoption April 2025 – March 30 the council have a Total Identified Supply of 4,238 dwellings⁵, which comprises 1,267 from extant permissions, 608 windfalls and 2,363 proposed allocations, including 1,126 from PWeC. We understand however that an updated trajectory is being prepared. As such we reserve the right to respond further on this matter at the examination.

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?

3.1 Whilst we understand the Updated Local Plan Housing Trajectory included in PS_062 is being updated for the stage 3 examination hearing sessions, as published it identified 831 dwellings being delivered on PWeC between 2024/25 and 2028/29. Whilst Redrow and Persimmon have hybrid applications with the council, these are still subject to ongoing discussions and it is unlikely that these applications will be determined before the final report is received. As such we have proposed a revised trajectory as per appendix 1 attached, which would see 330 dwellings completed on land east of Paddock Wood between 2024/25 and 2028/29; which together with a potential 290 on the Crest and Dandara land to the west would see 620 dwellings completed on PWeC between 2024/25 and 2028/29; some 211 dwellings less than anticipated. The comparable figures for 2025/26 – 29/30 being 450 dwellings on land east of Paddock Wood, and 450 dwellings on land west of Paddock Wood i.e. 900 in total as compared with 1,126 in the trajectory in PS_062 i.e. 226 less than anticipated.

3.2 As the Redrow and Persimmon applications are hybrid applications with phase 1 detailed plans providing for 170 and 160 dwellings respectively, and as both sites are being

⁴ These have not yet been released.

⁵ 758 + 1049 + 798 + 926 + 707 = 4,238

promoted by national housebuilders with proven track records of delivery, and an agreed strategy in place with the Council, we believe the proposed trajectory to be as accurate as it can be in the circumstances. The landowners and their agents having been kept up to date on progress on both applications and their associated infrastructure requirements throughout, and detailed discussions having taken place in terms of developer's agreements and infrastructure delivery⁶.

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?

4.1 We note that the Updated Local Plan Housing Trajectory included in PS_062 suggests that 456 windfalls will be delivered between 2024/25 and 2028/29, with a further 152dpa thereafter for the rest of the plan period. Whilst nothing the content of section 11 of PS_054 on windfalls, we leave the council to justify its inclusion of this level of windfall development within the first 5 years given the aims and objectives of national planning policy guidance.

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

5.1 We note that para 3 of PS_062 suggests 6.13 years supply for the period April 2025 – March 30 based on the Liverpool method⁷. Why the council have looked to adopt the Liverpool method given the scale of the suggested surplus and the advice in PPG, we do not know, especially as, when taking the figures in PS_062 at face value the position moving forward continues to be strong, even talking account of the reduced scale of deliver expected at Paddock Wood and a possible reappraisal of the position on windfalls, albeit we accept this could make the position very tenuous, hence the possible need to consider a stepped trajectory.

⁶ Whilst we acknowledge that the above, is less than the medium average timeframes taken from validation to gaining consent to first completions as set out in figure 3.1 of Lichfields Start to Finish (Third Edition (March 2024) (<https://lichfields.uk/content/insights/start-to-finish-3>)), (we are looking at 3 years from validation to planning consent and 14 months from consent to first occupations rather than a medium average of 4.9yrs and 1.3 years (14months) respectively according to Lichfield's), we believe, given the PPA we have in place and the work that has already taken place on the applications, and the commitment of both parties to the delivery of this site, that it is achievable.

Furthermore, Persimmon achieved occupations within 14 months of starting on site at Mascalls Court Farm in Paddock Wood -14/506766/HYBRID refers- The Hybrid permission in that case was granted 23 March 2018 and first occupation took place on 17th May 2019

The proposed build out rates are comparable to those found in Figure 4.1: Lichfields Start to Finish (Third Edition (March 2024) which suggest build-out rates of on average 68 - 101dpa for sites of 1,000-1,499, and 74 – 130 dpa for sites of 1,500 -1,999.

⁷ It actually appears from p5 of document PS_077(f) and PS_065 that the Council are using the Sedgfield approach is assessing shortfall and the Liverpool method for assessing surplus.

JAA for Redrow and Persimmon Homes (South East)
 JAA ID: 1233764
 Tunbridge Wells Borough Council Local Plan Examination – Stage 3
 Matter 8 Issues 1 & 2
 To be debated Thursday 20th June 2024

Row	Five-Year HLS Component	TWBC HLS Calculations (April 2024 – March 29) From PS_062.	TWBC HLS Calculations (April 2025 – March 30) From PS_062.
1	Annualised Figure Across Five-Year Period	677	
2	Completions April 20 – March 23	1,842	
3	Expected completions in 23/24	842	Expected completions in 23/24 and 24/25 = 1,578 (842 + 736)
4	Shortfall / Surplus	$667 \times 4 = 2668 - 1842 - 842 = +16$	$667 \times 5 = 3,335 - 1842 - 1,578 = +85$
5	Five-Year Requirement	3,319 $667 \times 5 - 16$	3,250 $667 \times 5 - 85$
6	5% Buffer	166	162
7	Total Five-Year requirement	3,485	3,412
8	Five-Year Requirement annualised	697	682.50
9	Total Identified Supply NB taken at face value	4,267	4,238
10	Supply Position	+782 6.12 yrs. supply 4267/697	+ 826 6.2 yrs. supply 4,238/ 682.50

5.2 Again as we understand an updated trajectory is being prepared, we reserve the right to reponed further on this matter at the examination.

JAA for Redrow and Persimmon Homes (South East)
JAA ID: 1233764
Tunbridge Wells Borough Council Local Plan Examination – Stage 3
Matter 8 Issues 1 & 2
To be debated Thursday 20th June 2024

Appendix 1

Paddock Wood Housing Delivery Trajectory

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	Total
Redrow	0	0	0	40	60	60	60	60	60	60	60	60	60	20	600
Persimmon	0	0	10	40	60	60	60	60	60	60	60	60	30	0	560
Annual totals	0	0	10	80	120	120	120	120	120	120	120	120	90	20	1160
Cumulative position	0	0	10	90	210	330	450	570	690	810	930	1050	1140	1160	
Crest	0	0	0	30	80	80	100	100	100	100	100	60	20		770
Dandara	0	0	0		40	60	60	67	67	60	60	60	40		514
Annual totals	0	0	0	30	120	140	160	167	167	160	160	120	60		1284
Cumulative position	0	0	0	30	150	290	450	617	784	944	1004	1224	1284		
Total			10	110	240	260	280	287	287	280	280	240	150	20	2444
Cumulative position			10	120	360	620	900	1187	1474	1754	2034	2274	2424	2444	

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	Total
TWBC Updated Trajectory STR1/SS1 Dec 23			50	206	285	290	295	295	295	295	275	103	30	34	2453
Cumulative position			50	256	541	831	1126	1421	1716	2011	2286	2389	2419	2453	