

## Home Builders Federation

### Matter 9

## TUNBRIDGE WELLS LOCAL PLAN EXAMINATION

### Matter 9 – Housing land supply

#### Issue 1 – Total Housing Supply

Q1. 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?

For council.

Q2. 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.

Q3. Paragraph 4.54 of the submission version Local Plan states that there is a 'buffer' of approximately 1,000 dwellings (based on the mid-point of dwelling ranges) over and above the minimum housing requirement across the plan period. Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met?

Local Plans that have a significant reliance on strategic sites to meet its housing needs, especially in the first five years of the plan post adoption, need to be cautious with regard to the speed at which these will come forward and the overall level of deliver during the plan period. In bringing forward sites it is likely that the best-case scenario for the delivery of development is envisaged. However, in taking such an approach it is important to recognise that the proposed trajectory may not come forward as planned and that it is prudent to include a buffer in overall supply. This has been recognised by the Council who are proposing a buffer of around 8%. Whilst the HBF would agree with the need for a buffer we would suggest that the level being proposed is insufficient to provide the necessary certainty that needs will be met in full.

In our representations we refer to the Lichfields Study Start to Finish which provides a helpful overview as to the pace at which larger developments come forward. For example, figure 4 of this report outlines that average timescale from validation to the first



application to the completion of the first dwelling is 8.4 years. Therefore, if the application for a strategic site allocated in this plan is submitted in 2022/23 then compared to the average of other similar sites it can be expected to start delivering in 2030/31. Whilst clearly these sites may come forward more quickly, and the use of Planning Performance Agreements (PPA), promotion of hybrid applications and adopting Master Plans as SPDs will aid this process, the research indicates that there is the very real possibility that delivery may take much longer than is expected by the Council, especially where there is no national housebuilder involved.. As such it is important that either the buffer is increased to ensure that any delays are adequately addressed within the Council's housing supply, or the trajectories are adjusted to provide a more cautious assessment of the delivery expectations on the strategic sites.

Q4. In the event that new housing is delivered as expected, what is the justification for the size of the buffer proposed?

A buffer is included in the housing supply to take account of any delays to the delivery of a site or slower than expected delivery. As outlined above the complexity of delivering larger sites can see them come forward much slower than expected. Whilst the Council is taking steps to mitigate this through the preparation of Framework Master Plans and PPAs, and the site promoters may well be looking to submit hybrid applications, in order to ensure the plan is deliverable it is necessary to include a buffer.

Q5. Paragraph 69 of the Framework states that in order to promote the development of a good mix of sites, local planning authorities should (amongst other things) identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why this cannot be achieved. What proportion of the housing requirement will be met from sites no larger than 1 hectare in Tunbridge Wells?

Whilst this is for Council to answer the HBF consider that it is essential they meet this key requirement of national policy. The Government have recognised the importance of having small sites allocated in local plans in order to support smaller and medium sized house builders who face disproportionate costs and higher risks in bring forward sites. The Government's drive to support smaller developers recognises the contribution they make in ensuring that more homes can be delivered more quickly as well as ensuring a diversity of homes in an area to meet consumer demands. We therefore consider it essential for the Council can show that at least 10% of its requirement comes forward on identified sites of 1 ha or less.

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

Q1. Taking into account completions since the based date of the Plan, what will be the anticipated five-year housing land requirement upon adoption of the Plan?

The Council are proposing, as set out in paragraph 11 of CD 3.163, to average any surplus delivery from previous years over the remaining plan period. On the basis of this approach, and if the plan is adopted in 2022/23, the five-year housing requirement



on adoption will 3,537 homes. However, If the surplus is ignored, as was the case in appeal on Land South of Oakridge, Highnam, (APP/G1630/W/17/3184272), then there would be a shortfall in the five-year land supply from 2024/25, then the five-year housing requirement increases slightly to 3,560 homes. Given that the decision from the subsequent legal challenge found that the inspector was not wrong in taking this position, whilst also outlining that national policy was silent on the matter, there remains a debate as to whether surplus from previous years should be included in the assessment of the five-year housing land supply.

Q2. How does the five-year housing land requirement compare to previous rates of delivery in Tunbridge Wells?

For Council.

Q3. Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

For Council.

Q4. What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

As set out above the HBF have some concerns regarding the Council's proposed timeframes for the delivery of the strategic sites. Whilst we would consider, where promoted by national housebuilders these sites to be developable, the Council will need to provide further evidence that the Council, and its partners, have the resources and capacity to ensure these strategic sites can come forward concurrently within the next five years.

Q5. Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years?

See response above.

Q6. 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?

For Council.

Q7. 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 over the plan period, as required by paragraph 70 of the Framework?

No comment.





Q8. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

We would suggest that expecting the strategic sites at Tudeley and Paddock Wood to come forward concurrently and within five years is ambitious. Of the evidence provided the proposed development at Paddock Wood with multiple house builders involved would seem the most likely candidate to come forward within five years with Tudeley more likely to come forward in years 6 to 10. Taking even a slightly more cautious approach to delivery on both these sites - a year delay to Paddock Wood and a two-year delay to Tudeley - would see the five-year housing land supply on adoption of 5.26-years based on the Council's approach that any surplus is averaged over the remaining plan period. However, should the plan be adopted in 2023/24 the five-year land supply would be 4.94-years. Clearly there is limited flexibility in the housing supply to take account of slight shifts in the delivery expectations of these strategic sites. For this reason, the HBF advocates that alongside the current allocations in the local plan the Council should allocate more small and medium sized sites to come forward early in the plan period and provide a more robust supply across the whole of the plan's timeframe.

Q9. What flexibility does the plan provide if some of the larger sites do not come forward in the timescales envisaged?

As set out above the Council should have allocated more small and medium sized sites alongside the strategic sites to ensure that there was a robust supply of homes in the first five years and across the plan period.

Q10. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Identifying and allocating additional sites should be the priority to ensure that there is consistent supply across the whole plan period and avoid the need for early reviews. However, should this not be considered appropriate by the inspector a review mechanism is required. Whilst the Council is required to review their plan every five years this may be too late should it come to light much sooner that there is likely to be a delay in delivery.

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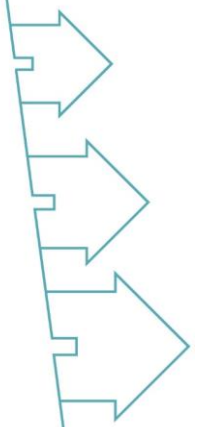


**Appendix A – Five Year Land Supply assessment based on delivery at Paddock Wood being pushed back by 1 year and Tudeley by 2 years.**

**No carry forward of surplus**

	20/21	21/22	22/23	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	37/38
Req.	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative	678	1,356	2,034	2,712	3,390	4,068	4,746	5,424	6,102	6,780	7,458	8,136	8,814	9,492	10,170	10,848	11,526	12,204
Delivery	767	932	990	986	801	435	510	737	686	623	736	733	720	661	598	655	656	631
Cumulative	767	1,699	2,689	3,675	4,476	4,911	5,421	6,158	6,844	7,467	8,203	8,936	9,656	10,317	10,915	11,570	12,226	12,857
Surplus/ deficit	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Five-Year req.	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390				
add deficit/ surplus	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390				
Buffer	170	170	170	170	170	170	170	170	170	170	170	170	170	170				
Total req.	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560	3,560				
Five-Year supply	4,476	4,144	3,722	3,469	3,169	2,991	3,292	3,515	3,498	3,473	3,448	3,367	3,290	3,201				
Surplus/ deficit	917	585	163	-91	-391	-569	-268	-45	-62	-87	-112	-193	-270	-359				
SYHLS	6.29	5.82	5.23	4.87	4.45	4.20	4.62	4.94	4.91	4.88	4.84	4.73	4.62	4.50				

**Surplus delivered over remaining plan period**



	20/21	21/22	22/23	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	37/38
Req.	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative	678	1,356	2,034	2,712	3,390	4,068	4,746	5,424	6,102	6,780	7,458	8,136	8,814	9,492	10,170	10,848	11,526	12,204
Delivery	767	932	990	986	801	435	510	737	686	623	736	733	720	661	598	655	656	631
Cumulative	767	1,699	2,689	3,675	4,476	4,911	5,421	6,158	6,844	7,467	8,203	8,936	9,656	10,317	10,915	11,570	12,226	12,857
Surplus/deficit	89	343	655	963	1086	843	675	734	742	687	745	800	842	825	745	722	700	653
Five-year req.	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390	3,390				
add deficit/ surplus	3,390	3,385	3,369	3,346	3,321	3,306	3,320	3,329	3,317	3,308	3,304	3,284	3,257	3,222				
Buffer	170	169	168	167	166	165	166	166	166	165	165	164	163	161				
Total req.	3,560	3,554	3,537	3,514	3,487	3,472	3,486	3,495	3,482	3,473	3,469	3,448	3,420	3,383				
Five-Year supply	4,476	4,144	3,722	3,469	3,169	2,991	3,292	3,515	3,498	3,473	3,448	3,367	3,290	3,201				
Surplus/deficit	917	590	185	-45	-318	-481	-194	20	16	0	-21	-81	-130	-182				
5YHLS	6.29	5.83	5.26	4.94	4.54	4.31	4.72	5.03	5.02	5.00	4.97	4.88	4.81	4.73				