

Sent by email to: planning.policy@tunbridgewells.gov.uk

26/02/2024

Dear Sir/ Madam

Tunbridge Local Plan – Local Plan Development Strategy

1. Thank you for consulting the Home Builders Federation (HBF) on the Local Plan Development Strategy Topic Paper. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. Whilst the HBF welcome the decision to move forward with the plan the HBF do have the following concerns with regard to the changes being proposed to policy STR1.
 - STR 1 in effect looks ahead for only 10 years rather than the 15 required by national policy.
 - The supply over the 10 years provides very little headroom.
 - The use of the Liverpool methodology for assessing the five year housing land supply.

STR1 looks ahead only 10 years in relation to housing land supply and as such is inconsistent with paragraph 22 of the NPPF.

3. SLP Mod 3 (PS_063) outlines that the broad development strategy for Tunbridge Wells borough over the period 2020 - 2038, is to ensure that a minimum of 12,006 dwellings are developed and that the Council will undertake an early review of the Local Plan, which will include further investigation of ways of meeting identified housing needs for the period post 2034. As such STR1 looks ahead for only 10 years rather than the 15 years with regard to housing provision, with delivery in the final years of the plan being identified through an

early review rather than broad locations as is required in the NPPF. The Council did look at pausing the plan to look at alternative sites in order to meet needs in full but went against the decision on the basis that it was too similar to not having a local plan. The HBF would disagree with this conclusion and believe that the Council could have looked to identify and allocate additional sites in this period in order to try and meet needs. This approach would have enabled the Council to be confident that it had a sound plan that addressed housing needs in full. Indeed, the benefits of such an approach seem to have been down played by the Council in Sustainability Appraisal which notes that slight improvements in the score relating to the housing objective are brought about by the certainty of having a 15-year supply of housing.

Housing supply lacks flexibility to ensure the plan is deliverable over the plan period.

4. In the context of delivery over the 10 years, we note that the Updated Local Plan Housing Trajectory (PS_062) sets out that 10,933 dwellings over the period to 2038, against a target of 12,006, based on a LHN figure of 667 dwellings per annum - a shortfall of 1,073 dwellings over the original plan period. With to supply over the proposed 10-year period from adoption to 2034/35 the council expect to deliver 10,280 dwellings against a target of 10,005 resulting in a surplus of 275 dwellings, a circa 2.8% buffer over the requirement.
5. The HBF are concerned that this is insufficient given that any delays in the delivery over a shortened plan period could see the council falling substantially short of what is required. Indeed, much of the buffer is a result of the amendments to the windfall which has added 520 homes to supply. The HBF would expect delivery over this shortened period to have a more substantial buffer in order for the council to be confident that the plan is an effective one and that delays in the delivery of sites will not impact on meeting housing needs in full. The HBF consider it necessary additional sites to be allocated to ensure the there is sufficient flexibility in supply to ensure the plan is deliverable.

The use of Liverpool methodology is inconsistent with national policy.

6. In addition, the HBF note that when considering the 5-year housing land supply situation (HLS) the Council have used the Liverpool method. The approach is inconsistent with national guidance, with the council providing insufficient justification as to why it should be permitted to adopt this approach. Given that the under the proposed trajectory the Council

seemingly will have a 5-year land supply using the Sedgefield approach there would appear to be no justification for adopting the Liverpool approach.

Yours faithfully

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