

Tunbridge Wells Borough



Tunbridge Wells Borough Council  
**Housing Needs Assessment Topic Paper  
for Pre-Submission Local Plan**

**February 2021**



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# 1.0 Introduction and Purpose

- 1.1 Tunbridge Wells Borough Council is undertaking a full review of its Local Plan. Assessing housing need is the first step in the process of deciding how many homes to aim to plan for (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> ). This is an objective assessment, separate from and prior to the consideration of the potential to meet this need through ‘sustainable development’ ([see NPPF paragraphs 7 and 8](#)).
- 1.2 National policy is clear in expecting local plans to ‘*positively seek to meet the development needs of their area*’ (NPPF paragraph 11). It adds that, “*to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed*”, adding that the needs of groups with specific housing requirements should be addressed (NPPF paragraph 59).
- 1.3 Hence, the purpose of this paper is two-fold:
- Part 1 identifies the overall housing need for the borough that the Local Plan should aim to meet over the plan period
  - Part 2 identifies the particular housing needs, respectively relating to:
    - The need for affordable housing
    - The need for private rented housing
    - The housing needs of older people
    - The housing needs of people with disabilities
    - The housing needs of gypsies, travellers and travelling show people
    - The need for custom and self-build housebuilding opportunities
    - The need for a proportion of smaller housing sites
- 1.4 The findings of these assessments provide both a starting point for seeking development opportunities to meet the overall need and for developing policy approaches to meet specific identified housing needs within the population.
- 1.5 It is noted that this Topic Paper updates an earlier version prepared to support the Draft Local Plan that was published for public consultation under Regulation 18 of the [Local Planning regulations](#). It takes account of comments received during that consultation, as well as the recently revised (at December 2020) national Planning Practice Guidance (PPG) and further analysis of local housing needs undertaken by consultants for the Council specifically to inform the preparation of the Pre-Submission Local Plan. All supporting documents referred to throughout this document can be found under [Supporting Documents](#) on the Council’s Local Plan web page.

# 2.0 Part 1: Overall Housing Need

## Plan period and housing needs

2.1 Local Plans should look ahead at least 15 years from adoption (NPPF paragraph 22). Furthermore, in relation to housing, the NPPF, at paragraph 67, adds:

*“Planning policies should identify a supply of:*

*a) specific, deliverable sites for years one to five of the plan period (footnote 6: with an appropriate buffer), and*

*b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

2.2 The programme for the Local Plan, as set out in the current [Local Development Scheme](#) envisages adoption in June 2022. This latest programme takes account of the longer than previously anticipated timescale to consider the substantial level of comments on the Draft Local Plan, and to then commission and undertake further evidence work to address issues raised.

2.3 To maintain a full 15-year time horizon, the plan period is being extended for the Pre-Submission Local Plan to March 2038; that is, 15.75 years from the anticipated date of adoption. The base date of the Local Plan is April 2020, this being the most recent annual monitoring point. Hence, housing need calculations relate to the period from 1 April 2020 to 31 March 2038.

## ‘Standard Method’ calculation of housing need

2.4 The NPPF states, at paragraph 60:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

2.5 Details of the use of the Standard Method to calculate the minimum annual housing need figure are set out in the supporting PPG ([see PPG: Housing Need Assessment, Paragraph ID 2a-004-20201216](#)). The PPG also makes clear that other methods of calculating ‘housing need’ will only be allowed in exceptional circumstances, and would be closely scrutinised at examination ([see PPG: Housing Need Assessment, Paragraph ID: 2a-003-20190220](#)).

- 2.6 The Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply ([see Planning Practice Guidance: Housing and economic needs assessment, Paragraph 4](#)). Hence, there is no need to consider need and supply matters before the base year of the Local Plan.
- 2.7 The same paragraph highlights, under ‘Step 1’, that the annual target is based firstly on the projected average annual household growth over a 10-year period (which should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). There is then an uplift applied, to take account of affordability.
- 2.8 The extent of the uplift under the Standard Method is bounded. Where it identifies a minimum local housing need figure that is significantly higher than the number of homes currently being planned for, a ‘cap’ is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible. This is set at 40% above either the household projections or the existing Local Plan figure, whichever is the higher.
- 2.9 Very recently, in December 2020, following consultation on ‘Changes to the Current Planning System’, the Government updated the PPG in relation to identifying housing needs. This has determined that the existing standard method for calculating housing need (including its reliance on the 2014-based household projections) should continue to be used, subject to a new "*cities and urban centres uplift*" of 35% for England's 20 biggest cities and towns. Lichfields (see [Mangling the mutant: change to the standard method for local housing need](#)) have calculated that this updated Standard Method (i.e. with the cities/urban centres uplift and still applying the cap) generates a need to build the target 300,000 new homes each year nationally (although the precise figure will change over time in response to updated affordability ratios, projection periods, and outputs of the plan-based 'cap').
- 2.10 It is also worth highlighting that this outcome of the updated Standard Method fully aligns with the Government’s manifesto pledge to ‘continue our progress towards our target of 300,000 homes a year by the mid-2020’.
- 2.11 In terms of the effects of the updated Standard Method locally, it is the case that it provides stability for Tunbridge Wells, and for its neighbouring authorities, insofar as the local housing need calculation used in developing the Local Plan is unchanged.
- 2.12 London is the closest city with an uplifted figure, which will need to be considered by a future London Plan, in the context of the PPG clearly setting out that any increase in the number of homes to be delivered in urban areas "*is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations*".

- 2.13 The current calculation of the local housing need using the Standard Method, including application of the cap, for Tunbridge Wells borough is set out in Appendix 1 and summarised below.
- 2.14 Based on the 10-year household projections from the current year (i.e. for the period 2020-2030), the relevant household projection is for 484 dwellings/year. (NB This is the 2030 figure (56,293) minus the 2020 figure (51,450) = 4,843, divided by 10 years = 484 dwellings per annum (dpa)).
- 2.15 With its relatively high house prices, application of the affordability uplift to the borough produces a figure of 741 dwellings/year. However, due to the substantial increase above household growth projections, the above-mentioned 40% increase cap is applied. (i.e. 484 dwellings/year multiplied by 1.4)
- 2.16 Hence, applying the Standard Method, the local housing need for Tunbridge Wells borough is 678 dwellings/year, or 12,204 net additional dwellings over a plan period 2020 - 2038.
- 2.17 It can be seen that this target under the Standard Method is a little, 8.5%, less than the uncapped figure ( $678/741=91.5\%$ ). Further consideration of whether the Council should plan for the uncapped figure, or another level of need than set by the Standard Method, is given in the following section.

## Regard to demographic trends and market signals

- 2.18 The Council has to consider whether demographic trends and market signals suggest that the Local Plan should set a higher target than that determined using the Standard Method. The PPG highlights ([see Paragraph 7 of PPG: Housing and economic needs assessment](#)) that, while the cap reduces the minimum number generated by the Standard Method, it does not reduce housing need itself. It adds that, where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.
- 2.19 In addition, given the significant number of responses to the Draft Local Plan consultation arguing that using the 2014-based household projections overstates the actual local housing need, this viewpoint is also examined.
- 2.20 To assist it, the Council commissioned an up-to-date review of local housing needs from Icen Projects Limited (“Icen”). Its report, which specifically investigates the robustness of the Government-prescribed standard method formula and whether ‘exceptional circumstances justify an alternative approach’ in accordance with NPPF paragraph 60, is available under [Supporting Documents](#) on the Local Plan website.

- 2.21 In essence, Icení concludes that there are not the exceptional circumstances to justify an alternative assessment of housing need that would withstand scrutiny at a future Local Plan Examination.
- 2.22 Firstly, while noting that more recent population projections for Tunbridge Wells project lower population growth than the 2014-based population projections which currently feeds into the standard method, it found that this is a function in particular of weaker natural change and not factors unique to Tunbridge Wells, but reflective of wider national trends. Also, while the latest official household projections indicate a slowing rate of household growth, these are seen as a consequence of under-supply nationally, as reflected by higher affordability ratios. Therefore, they do not provide a locally specific rationale for deviating from the standard method.
- 2.23 Moreover, the PPG highlights that household growth on its own is insufficient as an indicator of future housing need because household formation is constrained by the supply, and cost, of available properties.
- 2.24 Icení's analysis shows that net migration to the Borough is likely to have been influenced by historic housing delivery, while deteriorating affordability can be assumed to have constrained household formation.
- 2.25 Icení acknowledges that the extent to which the inclusion of an uplift to the household projections will improve affordability in Tunbridge Wells will be influenced by the extent to which housing supply and delivery is increased across the wider region as well as London; also, that there are also wider macro-economic factors that will influence overall housing affordability and demand including wider economic trends, interest rates and access to mortgage finance. Nevertheless, while finding that a material change in the supply-demand dynamic across the wider South East is necessary to have a material effect on affordability, it highlights that Government policy requires each authority to play its part in this (whilst achieving sustainable development).
- 2.26 In relation to the achievability of a higher housing need than identified by the Standard Method, Icení notes that the level of housing delivery implied by the current capped Standard Method calculation is 1.20% pa, while the uncapped figure would be 1.30% pa. To put this in context, the Government's target of an increase to 300,000 new homes built nationally by the mid-2020's is equivalent to 1.2% stock growth pa. However, it also takes account of the fact that, as the extensive part of Tunbridge Wells borough affected by strategic development constraints, in particular the High Weald AONB, development would inevitably need to be concentrated in a more limited area of the Borough; hence, it considers the potential of the market to support high levels of housing delivery in those parts of the District which are outside of the AONB.

- 2.27 The analysis undertaken indicates that this results in relatively high levels of housing delivery relative to what has been seen in Tunbridge Wells historically. However, considered against wider benchmarks, it finds that the growth rates implied by the current standard method of 678 dpa can be achieved from a market capacity perspective with the emerging development strategy, subject to some ‘smoothing out’ of the trajectory.
- 2.28 It also finds that the higher, uncapped need may also be achievable, notwithstanding this would involve a further significant increase over recent building rates. However, it concludes that it would not be unreasonable for the Council to adopt the capped standard method need, having regard to the concentration of growth potential in the west of the borough, the fact that it will be a ‘minimum’ requirement, and the benefits to housing delivery of getting an up-to-date plan in place as soon as possible.
- 2.29 At the same time, Icenii state that the Sustainability Appraisal should further test a growth scenario for higher housing provision aligned to the uncapped housing need of 741 dwellings pa.
- 2.30 In addition, consideration is given to the fact that the capped Standard Method figure of 678 dwellings pa is well in excess of recent build rates. On average, 495 net additional dwellings have been built over the last five years (1 April 2015 – 31 March 2020). Hence, not only is the new target more than double the current (2010) Core Strategy requirement of 6,000 net additional dwellings over 20 years (300 per annum), it represents a 37% increase in recent house-building rates. This would be a very substantial boost in terms of the performance of the local housing market.
- 2.31 A further consideration is around matching housing growth with job supply. The earlier SHMA found that the likely job-growth scenario implied a housing need of 572 dwellings per year; hence, there is no economic need for a further upwards adjustment to that under the Standard Method. Nor are there local economic strategies or strategic infrastructure improvements that may drive further growth.
- 2.32 In conclusion, the Standard Method capped figure is regarded as being a realistic but achievable housing need target, seeking a significant increase in the level of housebuilding relative to what has been achieved in recent years (as well as being 40% above the projected household growth for the borough).
- 2.33 **Therefore, at least 678 dwellings a year is regarded an appropriate local housing need target for the new Local Plan for the borough.**



## Regard to housing need in neighbouring authorities

- 2.34 The NPPF, at paragraph 60, advises that any unmet need within neighbouring authorities should also be taken into account in establishing the amount of housing to be planned for.
- 2.35 Supporting guidance also advises that identifying the 'housing market area' is appropriate to assist in preparing policies for meeting housing need across local authority boundaries ([see Plan-making Paragraph: 039 Reference ID: 61-039-20190315](#)).
- 2.36 The [SHMA](#) defines the relevant housing market area as being the 'West Kent Housing Market Area' (HMA), reflecting the 2011 Tunbridge Wells TTWA, which includes Sevenoaks, Tonbridge and Tunbridge Wells, and extends to include Crowborough, Hawkhurst and Heathfield. GL Hearn would consider that provides an appropriate HMA geography. This is shown in Figure 1 below.

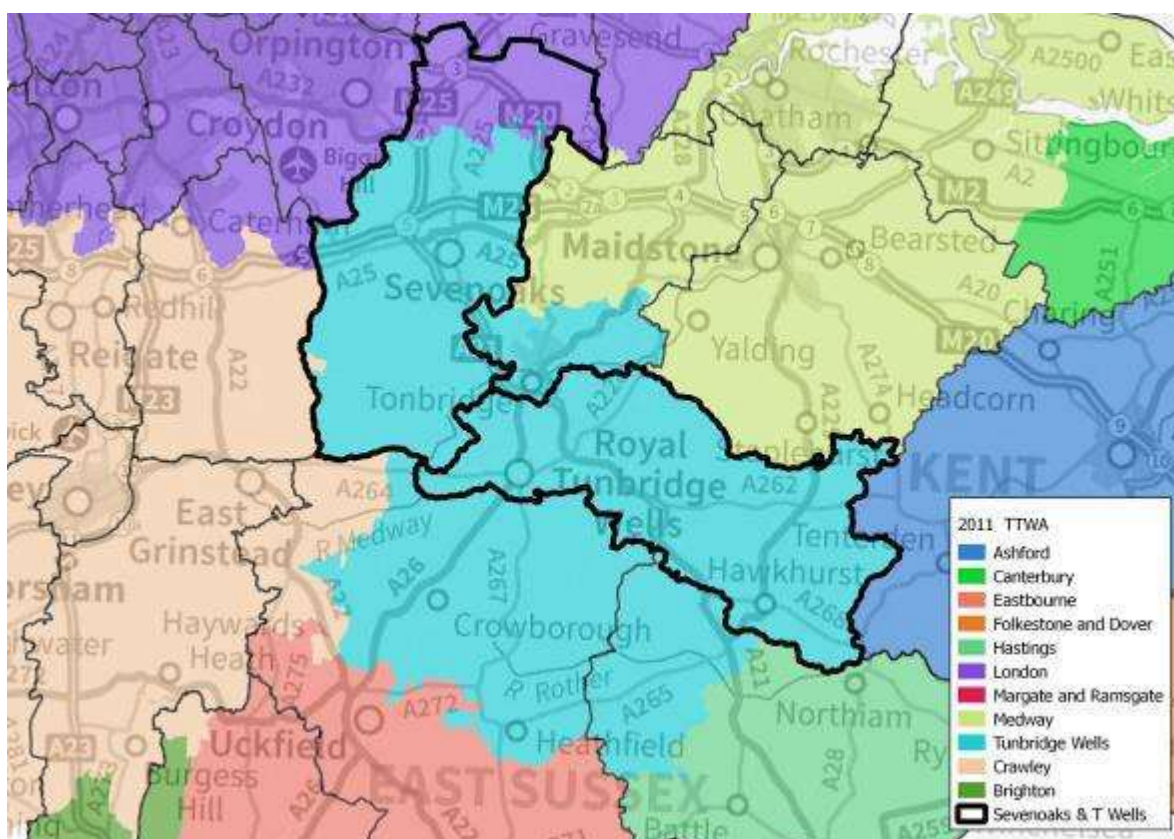


Figure 1: Local housing market area (from SHMA)

- 2.37 In terms the relationship to local authority boundaries, the TTWA covers most of Sevenoaks district, with the western part of Tonbridge & Malling borough, focused on Tonbridge itself, providing a key linkage. The HMA also extends into the northern part of Wealden district and the north-western, quite rural, part of Rother district.

2.38 In any event, given the various cross-boundary interactions and for completeness, consideration is given to the housing need and supply situation in all neighbouring local authority areas below. The current plan-making situation in neighbouring authorities, at January 2021, is set out in Table 1:

Table 1: Local Plan context in neighbouring Local Planning Authorities

<b>Local Planning Authority</b>	<b>Plan-making position</b>
Ashford	<u>Adopted Local Plan documents:</u> Ashford Local Plan February 2019  <u>Local Plan review documents:</u> Ashford Gypsy and Traveller Accommodation Local Plan Options Report (Regulation 18 Consultation) January 2020
Maidstone	<u>Adopted Local Plan documents:</u> Maidstone Local Plan October 2017  <u>Local Plan review documents:</u> Maidstone Regulation 18b Preferred Approach Consultation 1 December 2020 - 8 January 2021
Rother	<u>Adopted Local Plan documents:</u> Rother Core Strategy September 2014  Rother Development and Site Allocations Local Plan December 2019  <u>Local Plan review documents:</u> Rother Stakeholder Engagement/Evidence Gathering on a new Local Plan has commenced

Local Planning Authority	Plan-making position
Sevenoaks	<p><u>Adopted Local Plan Documents:</u></p> <p>Sevenoaks District Council Core Strategy February 2011  Sevenoaks District Council Allocations and Development Management Plan February 2015</p> <p><u>Local Plan review documents:</u></p> <p>Sevenoaks District Council Issues and Options Consultation Document July 2017  Sevenoaks District Council Regulation 18 Consultation Plan July 2018  Sevenoaks District Council Proposed Submission Version of the Local Plan (PSLP) (Regulation 19) December 2018  Submitted Local Plan at Examination</p>
Tonbridge & Malling	<p><u>Adopted Local Plan documents:</u></p> <p>Tonbridge &amp; Malling Core Strategy 2007  Tonbridge &amp; Malling Development Land Allocations April 2008  Tonbridge Central Area Action Plan April 2008  Compendium of Saved Policies April 2010:</p> <p><u>Local Plan review documents:</u></p> <p>Tonbridge &amp; Malling Local Plan The Way Forward (Issues and Options) September 2016  No Regulation 18 Draft Local Plan  Tonbridge &amp; Malling Local Plan Submission Version (LPSV) January 2019  Submitted Local Plan at Examination</p>
Wealden	<p><u>Adopted Local Plan documents:</u></p> <p>Wealden Local Plan adopted 1998  Wealden District Core Strategy Local Plan 2013  Affordable Housing Delivery Local Plan 2016</p> <p><u>Local plan review documents:</u></p> <p>Submitted Local Plan, January 2019, withdrawn following Examination (documents also withdrawn from website)  'Direction of Travel' consultation for new Local Plan, Nov 2020</p>

- 2.39 As can be seen from Table 1, none of the Borough Council's neighbours is at the same stage in the plan-making process; that is, preparing its Reg. 19 Local Plan.
- 2.40 Of the LPAs with up-to-date Local Plans (i.e. adopted within the last five years), both **Maidstone** and **Ashford** councils meet their housing need in full through their Local Plans. Although a review of the Maidstone Local Plan is underway, it is too early to know if it will be able to meet its future need. However, it has previously met its housing need and is not so constrained by Green Belt or Area of Outstanding Natural Beauty (AONB) designations. Ashford, whose Local Plan is barely two years old, is currently focussed on preparing a Gypsy and Traveller DPD.
- 2.41 None of the other four neighbouring councils has an up-to-date Local Plan and, moreover, there is currently uncertainty regarding their likely final form, including the extent to which they will meet their own (and any unmet) housing needs. The respective positions are summarised below.
- 2.42 The last submitted Local Plan for **Wealden** proposed to meet its local housing needs. However, this was withdrawn, in February 2020, following examination, which found failings in its approach to the Ashdown Forest SPA and to meeting the duty to cooperate. It has essentially started again with a new Local Plan. It is setting out to meet its own housing need. Additionally, there is the prospect of a further request from Eastbourne Borough Council to help meet its housing needs. Its initial consultative document does not indicate a likely scale of future development.
- 2.43 **Sevenoaks District Council's** submitted Local Plan identified a housing need of 707 dwellings per year, equivalent to 11,312 dwellings over its plan period (2019-2035). However, its identified supply leaves a shortfall of some 1,900 dwellings against this need. The District Council explains this position principally in relation to its substantial Green Belt coverage. However, it does not have any arrangements in place to meet the unmet need at the present time. There has been criticism of its efforts to address undersupply/unmet need by the examining Inspector, who has found that it has failed to meet the duty to cooperate in this respect. The District Council has very recently (January 2021) challenged a High Court ruling that dismissed its challenge to the Inspector's conclusion.
- 2.44 **Tonbridge & Malling's** Local Plan is currently at examination, albeit that the examining Inspectors have expressed, on a provisional basis, serious concerns in relation to whether it engaged adequately and on an ongoing basis with Sevenoaks in relation to helping meet its housing needs. In late January 2021, the Borough Council is preparing its response to the Inspectors. It is highlighted that the Tonbridge & Malling Local Plan proposes to meet its local housing needs in full.
- 2.45 **Rother** has embarked on the preparation of a new Local Plan, but has yet to undertake substantive work on it, or publish any consultative proposals, so there is no indication of an unmet need.

- 2.46 Further information in relation to the ongoing dialogue with the neighbouring councils on strategic matters, including housing, is contained in the Duty to Cooperate Statement that also supports the emerging Pre-Submission Local Plan. Within this Statement, the Borough Council clearly sets out the ongoing and purposeful nature of its dialogue with all its neighbours. The key points from this, which are supported by several recently agreed and draft 'statements of common ground', in relation to meeting housing needs are:
- a) The only formal, or informal, request to meet any neighbouring authority's unmet housing needs has been from Sevenoaks;
  - b) None of the Borough Council's own neighbouring authorities has responded positively to its request as to whether they could, or would be likely to be able to, assist meet its housing needs (on the basis that it is clear that to meet its own needs within Tunbridge Wells would involve both the removal of land from the Green Belt and major development in the High Weald AONB).

## Conclusions

- 2.47 It follows from the above that the Borough Council should, as a minimum, seek to meet its own local housing needs within the borough. In addition, although there is uncertainty about the robustness of the request by Sevenoaks District Council for help in meeting some of its housing need, it would be prudent to also consider the scope to help meet its unmet needs in order to ensure, as much as possible in accordance with the NPPF, that the full housing need across the West Kent housing market area is met.
- 2.48 Indeed, it is considered that the Sustainability Appraisal should assess a growth option that covers the scope for meeting up to the full unmet need (as currently advised) from Sevenoaks, of 1,900 dwellings. In addition, a further scenario with this in addition to the borough's own uncapped need should be assessed. This will provide an option with a relatively high level of growth, that covers both greater local needs than from Sevenoaks, or indeed elsewhere, if the current request is withdrawn or not found to be reasonable.

# 3.0 Part 2 – Particular Housing Needs

## Introduction

- 3.1 This section, Part 2, considers the housing needs of those groups highlighted in the NPPF with the exception of student housing, as there are no further education establishments in or close to the borough that generate a material level of demand.
- 3.2 The needs identified for each group do not necessarily equate to targets for the Local Plan. Rather, they should be considered in the context of the overall housing need figure calculated using the Standard Method. This recognises that the need for housing for particular groups of people may well exceed, or be proportionally high in relation to, the overall need. This may well be because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline, as opposed to the projected new households which form the baseline for the Standard Method. Hence, the Local Plan will need to produce policies to address the needs of specific groups as effectively as possible within the overall need established.

## The need for affordable housing

- 3.3 Affordable housing accounts for about 16% of the total stock of properties in the borough, the large majority of which are social rented. A further 17% are private rented, with some 66% owner-occupied (source: 2011 Census). Appendix 2 shows housing tenure as at the 2011 Census for each parish within the borough.
- 3.4 For clarity, the term 'affordable housing' is defined by the NPPF (Annex 2) as:
- “Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:*
- a) **Affordable housing for rent:** *meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to*

*be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

- b) **Starter homes:** *is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.*
- c) **Discounted market sales housing:** *is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*
- d) **Other affordable routes to home ownership:** *is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.”*

3.5 The NPPF (paragraph 62) clarifies that, where a need for affordable housing is identified, policies should specify the type of affordable housing required.

3.6 The PPG gives guidance in relation to calculating the need for affordable housing:

*“Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:*

- *the number of homeless households;*
- *the number of those in priority need who are currently housed in temporary accommodation;*
- *the number of households in over-crowded housing;*
- *the number of concealed households;*
- *the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and*
- *the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”*

- 3.7 Housing registers, as well as local authority and registered social landlord transfer lists, are seen as providing relevant information. While the borough's Register represents a tangible need, as opposed to a potential need, there is of course the prospect that households in need may not be on the Register (possibly due to being aware that they have little chance of being housed). Also, it does not consider future need – although the rate of additions to the Register may be a useful proxy.
- 3.8 Council's SHMA, 2015, found that the borough would need 341 affordable homes per annum to meet their housing needs and be eligible for affordable housing ([see SHMA, 2015](#) Table 39, page 90). This includes need arising from concealed and homeless households, as well as from overcrowded households, and those who seek an alternative tenure of accommodation, but would release a home for other households should a new affordable home be provided. This estimate is sensitive to assumptions on spending on housing costs relative to income. It assumes 30%, but the figure falls by about a quarter if 35% is assumed, or about 50% if 40% rent to income ratio is assumed ([see SHMA, 2015](#) Figures from Table 40, page 91).
- 3.9 A separate Housing Needs Study in 2018 ([see Housing Needs Study](#)), assessed affordable requirements by taking into account the need from existing and newly-forming households within sub-areas of the borough of Tunbridge Wells, and comparing this with the supply of affordable housing. Against a gross need for affordable housing of 662 dwellings each year, when the likely annual affordable supply is taken into account, the overall net imbalance is 443 affordable dwellings each year. This is considerably higher than the SHMA estimate of 341 dwellings, but includes significant numbers due to overcrowding, based on the bedroom standard. However, this may not represent actual demand in practice. Furthermore, this, and similar needs due to unsuitable housing, are assumed to be met within five years. The calculation includes meeting all the backlog within five years, but then applies the resulting annualised need for the first five years over the longer period of 15 years that the Local Plan covers. If the backlog is spread over the full 15-year period, based on the HNS estimate, the need is actually 391 dwellings per year.
- 3.10 An updated assessment recently commissioned by the Borough Council is provided in the 'Review of affordable housing needs in the context of 'First Homes' (2021). This suggests an annual need for around 323 affordable homes, essentially for rented housing, with some need for affordable home ownership, but which is difficult to quantify, given the supply of private renter accommodation. This figure broadly aligns with the earlier estimates. The main difference between in and the NHS estimate is the different data sources for income used.
- 3.11 Notwithstanding the variations, it should be noted that all three studies show that there is a substantial need for affordable housing in the Borough and that contributions to affordable housing should be maximised where possible.
- 3.12 Both the above estimates are forecasts of likely need arising. The Housing Register, while only covering need that is presented to the Council as housing authority, is a



useful source to point to for current, established need. Most recent (January 2021 information from the Council’s Housing team is that there are currently some 925 households on the Register. The number of households on the register has stayed consistent over the last five years. It fluctuates between 870 and 970, with the average time to be housed increasing somewhat.

- 3.13 The number of households housed over the last four years is shown below. The average is 310 households, of which some 66% are home seekers, (non-housing association tenants).

Table 2: Number of lets achieved for households on the Housing Register in financial years

<b>Lettings</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>
Home seekers	284	258	244	39
Transfers	88	59	67	200
<b>Total</b>	<b>372</b>	<b>317</b>	<b>311</b>	<b>239</b>

- 3.14 It should be noted that of the lets shown above the majority each year are one bedroom properties and sheltered, (older persons), housing. For example, 124 lets were of this size and/or tenure in the year 2019/20.

- 3.15 This leads to very long wait times for the larger households on our housing register. Given that these households are on the Housing Register because they have no other choice and may be sofa surfing, living in unsanitary and overcrowded situations, waiting times are becoming more and more unmanageable each year.

Table 3: Average wait times as of January 2021

<b>Type / Size</b>	<b>Average wait</b>
Sheltered accommodation	13 months
Studio general needs	5 months
1-bed general needs	12-18 months
2-bed flat or maisonette	24 -30 months
2-bed house	26 months
3-bed flat or maisonette	21 months
3-bed house	36 months
4-bed	48 months plus

- 3.16 Households on the Register are understandably seeking properties in their locality in most cases. Preferences for location are well distributed across the borough. There is more of a focus on the west of the Borough, including Royal Tunbridge

Wells/Southborough (201 people on the Register with a local connection). 118 residents on the Register with a local connection are looking to like in the western more rural part of the borough. It should be noted western areas of the borough are likely to be less appropriate for people in the east of the borough and vice versa.

- 3.17 Information from The Help to Buy Agent has suggested that there are some 161 households (either currently living or employed) in Tunbridge Wells borough who looking for shared ownership schemes (at January 2021)
- 3.18 In conclusion, it is clear that there is a relatively high need for affordable housing, as evidenced by high house prices and housing need. While effective demand appears lower than estimated total need, it is evident from the potential need for some 323 affordable homes per annum, relative to an overall need of 678 homes per annum (i.e. almost exactly 50%) that, even with an expanding private rented sector (see below), a significant number of new homes will need to be affordable.
- 3.19 It follows that planning policies should look at options to maximise delivery, both in terms of the proportion of affordable housing sought, and the thresholds applied, and to consider the most appropriate tenures to support those in greater housing need, subject to viability and housing mix considerations.

## Types of affordable housing

- 3.20 The SHMA estimated the likely need for intermediate and rented (social and affordable rents) of affordable homes. Taking the gross numbers for affordable housing need and comparing this against the supply from re-lets of existing stock, the analysis suggests that 64.3% of housing could be either social or affordable rented, with the remaining 35.7% being intermediate products ([see SHMA 2015 Table 42, page 96 \(227/353\)](#)).
- 3.21 The HNS also analysed the preference for rental (affordable/social rent) and intermediate (shared ownership) affordable housing. Analysis of tenure preferences for existing and newly forming households suggests a more even tenure split of 52.2% social/affordable rented, and 47.8% intermediate tenure. However, this does vary considerably depending on which part of the borough is studied.
- 3.22 The findings of the more recent Study essentially confirm the fairly compatible findings of the SHMA and the HNS in terms of tenure split. It supports the focus on social rent, as a greater proportion of social rented homes prioritises those in greatest housing need. At the same time, it recognises a need to provide some housing as affordable home ownership (i.e. intermediate housing) which would normally be in the form of or shared ownership and which, in the future, could also include First Homes, where this is genuinely affordable in a local context.
- 3.23 Overall, it is considered that affordable housing provision should normally involve 60% social rented and 40% intermediate tenures. As noted above, the focus on

social rented housing reflects that they will be affordable to a greater number of local households than affordable rents. There may be circumstances, such as scheme viability or to provide access to funding, where affordable rents may be acceptable. At the same time, affordability levels suggest a preference for normally seeking to maximise social rented units.

## First Homes

- 3.24 It is recognised that from 6 August 2020 to 1 October 2020 the Government carried out a consultation on the Changes to the Planning System White Paper. Part of this consultation included seeking feedback on securing First Homes that will be sold at a discount market price for first time buyers, including key workers. The Government intends to set out a policy that a minimum of 25 per cent of all affordable housing units secured through developer contributions should be First Homes which are sold at a minimum discount of 30% below the market price (with local authorities having discretion to increase the discount to 40% or 50%.)
- 3.25 The 'Review of affordable housing needs in the context of 'First Homes' (2021) study considered the potential requirements for First Homes on affordable housing in the Borough in terms of potential need and how it may be delivered. It estimates a need for around 363 affordable home ownership homes (priced for households able to afford to rent but not buy) per annum. However, it adds that caution should be exercised in trying to make a direct link between affordable need and planned delivery, as many of households picked up as having a need will already be living in housing; hence, providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else).
- 3.26 Overall, the 2021 study points towards a need to provide some housing as affordable home ownership, and the 25% First Homes would fall within this category. Given the high affordability of houses within Tunbridge Wells borough it will be important for the Council to ensure that such housing is genuinely affordable in a local context. Provision of 25% of affordable housing as First Homes is likely to be the most that is appropriate. It suggests that the Council should consider setting out expectations of costs of First Homes with reference to ONS private rental market data and a market survey or sale prices, which can be updated approximately every six months. As there will quite likely be occasions when a greater discount than 30% will be required, subject to scheme design. In these circumstances an additional discount can be considered, taking into account whether this would impact on viability.

## The need for private rented housing

- 3.27 As noted above, a significant proportion of homes - about 17% of the total stock - are rented in the private sector.
- 3.28 The SHMA notes that the proportion of households living in the private rented sector has increased by 6% over the 2001-11 period (and home ownership correspondingly reduced) as households are being forced to rent longer. Also, looking ahead, there is further potential for institutional investment in 'Build-to-Rent' housing schemes.
- 3.29 Younger households (based on household reference persons aged under 35 years) are found to have a high reliance on the private rented sector, as are Black and Minority Ethnic (BME) groups. Given that the housing options for young people may be more limited than for other groups, it will be important to monitor the accommodation quality – this will need to focus on the quality of shared accommodation and housing within the private rented sector.

## The housing needs of older people

- 3.30 The need to provide housing for older people is crucial, as the proportion of older people in the population is increasing. Drawing on Office for National Statistics data, the SHMA noted that the population of the borough of Tunbridge Wells aged 65+ years is expected to increase by 40.7%, from 22,600 in 2017 to 31,800 in 2033.
- 3.31 The latest Office for National Statistics (2018-based) demographic projections forecast a total population increase of some 6,155 people (5.1%) over the plan period (2020-2038). However, this shows substantial increases in the number of people aged over 65 years, and especially those over 85 years.
- 3.32 The table below shows the ONS projections increase in the older population by age cohort over the plan period, as well as the percentage increase for each age cohort. These are the population projections alone and do not take into account other demographics such as housebuilding or household formation. Overall, it shows that the proportion of the borough's population that is aged 65+ is likely to increase by 40% over the plan period.

Table 4: Populations change of older people

	<b>2020</b>	<b>2038</b>	<b>Increase</b>	<b>% increase</b>
65-74	11,921	15,611	3,690	31%
75-84	7,646	10,807	3,1612	41%

	<b>2020</b>	<b>2038</b>	<b>Increase</b>	<b>% increase</b>
85+	3,836	6,443	2,607	68%
Total 65-85+	23,403	32,861	9,458	40%

- 3.33 The NPPF, in its Glossary, defines older people for planning purposes as people over or approaching retirement age, ranging from active people to the very frail elderly, with diverse housing needs. The PPG identifies different types of older persons housing and states that it is critical that local plans offer older people ‘a better choice of accommodation to suit their changing needs’ and ‘help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ ([See Housing for Older and Disabled People. Paragraph: 001 Reference ID: 63-001-20190626](#))
- 3.34 It follows that close attention should be given to the number, size, location and quality of dwellings needed in the future for older people, in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.
- 3.35 Supporting independent living can help to reduce costs to health and social services and providing more options for older people to move could also free up houses that are under-occupied.
- 3.36 The SHMA’s consideration of the housing needs of older people finds that:
- Given that the number of older people is expected to increase in the future, and that the number of single person households is expected to increase, this would suggest (if occupancy patterns remain the same) that there will be a notable demand for affordable housing from the ageing population;
  - Given the ageing population and higher levels of disability and health problems amongst older people, it suggests that this would mean an increasing need for more specialist accommodation;
  - There is also a need to meet older people’s housing needs in both market and affordable sectors, as for overall affordable housing need;
  - Providing an element of bungalows should be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households.

## Residential Care and Nursing Care

- 3.37 The SHMA Update gives further specific consideration to the need for Registered Care bedspaces, defined in two categories:

- **Residential care:** Where a care home is registered to provide residential (personal) care only, all beds are allocated to residential care;
- **Nursing care:** Where a care home is registered to provide nursing care, all beds are allocated to nursing care, although in practice not all residents might be in need of, or receiving, nursing care.

3.38 It presents an indication of the number of people aged 75 and over who are expected to be living in some form of institutional housing (within Class C2):

Potential Need for Residential Care Housing: 2014-based SNPP (+MYE)

Institutional population aged 75+ (2015)	897
Institutional population aged 75+ (2035)	1,646
Change in institutional population aged 75+	750
Per annum 'need' (2015-35)	37

3.39 Kent County Council advises that in terms of residential/nursing care home provision Tunbridge Wells is relatively well served, but that there will still be a demand for this type of housing throughout the plan period, specifically for places funded by the local authority and places to support dementia care.

## Sheltered, age-specific and Extra Care housing

3.40 Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

3.41 Sheltered housing (also known as retirement living) usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

3.42 Extra care accommodation or housing with care is normally self-contained, with associated facilities, providing 24-hour access to emergency support, as well as on-site facilities, such as a residents' lounge, laundry room, and meal provision facilities. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses. Extra care accommodation can also be known as assisted living, close care, or continuing care housing.

3.43 The need for sheltered and age-specific housing, as an alternative to living at home, in part depends on the availability of "lifetime homes" within the housing stock, although it will still be the case that some people prefer the support available in a more communal living environment. This is evident from the fact that some 200 specialist units have been granted planning permission over the last four years.

3.44 SHOP@ (Strategic Housing for Older People Analysis Tool) is a forecasting tool referred to in the PPG for estimating the demand for specialist housing for older people, including extra care housing, endorsed by the Department of Health. This advises that the number of units required per 1,000 of the population over 75 years for extra care is 25 or 2.5%. The table below shows the Office for National Statistics (2018-based) projections for the increase in the number of residents over 75 years of age in the borough and the number of extra care places required based on the SHOP@ forecasting tool.

Table 5: Population change in residents 75+ and need for extra care places based on SHOP@

	<b>2020</b>	<b>2038</b>	<b>Increase 2020-2038</b>
75+	11,482	17,250	5,768
@25/1000	287	431	144

- 3.45 It can be seen that, based on the SHOP@ projections, the increase in the number of residents over 75 years of age in the borough would equate to some 431 extra care home places in the borough by 2038. This projection suggests an increase of some 267 dwellings over the current stock of 164 units extra care dwellings in Tunbridge Wells borough, as of 2020 (as advised by Kent County Council).
- 3.46 However, Kent County Council (KCC) has developed its own more localised methodology, drawing on local data. Its latest forecasts for extra care housing, indicate a potential demand up to 2031 of a further 188 extra care dwellings. By projecting this forward over the 7 additional years of the plan period, it gives an indicative need of approximately 245 dwellings.
- 3.47 This estimate of a need for 245 extra care units derived from KCC advice is a little less than the national forecasting model suggests (267 units). While it is reasonable to favour the locally derived estimate, there is undoubtedly some uncertainty around the forecasts. Therefore, it is considered prudent for the Local Plan to look towards providing for some 245 - 267 extra care units to be delivered over the plan period.
- 3.48 This target range is not regarded as hard and fast though as it is will, at least in terms of private sector dwellings, be influenced by market demand, as well as the availability of other forms of provision that can provide a similar level of support. This includes support available to people in their own homes, which will also be influenced by the provision of accessible and adaptable dwellings that enable elderly people to stay in their homes for longer.

## Accessible and Adaptable Dwellings

- 3.49 The HNS showed that the majority of older people (63.5%) want to stay in their own homes with help and support when needed. Some older people (26.3%) would consider buying a property on the open market, and that over half of older people are looking to downsize to a smaller dwelling. Of those households that wish to move, the main reasons given for being unable to do so are that other properties were too expensive, a suitable property could not be found of the size wanted or in the area wanted, and that properties did not have the adaptations needed.
- 3.50 The HNS asked whether adaptations were required by households. Those particularly mentioned by households aged 65+ years were generally related to mobility issues, and included adaptations to bathrooms (14.6%), internal handrails (12.7%), external handrails (9.1%), and stair-lifts (9.4%).
- 3.51 In summary, planning to meet the housing needs of older people is a major, strategic challenge for the Local Plan. The number of older person households will increase far more than households overall. This will inevitably include providing a range of more specialist housing.
- 3.52 At the same time, the HNS clearly demonstrates the strong desire of many older people to continue to live in their current homes. This is likely to generate a greater need for smaller housing units (bungalows and/or 1 or 2 bed flats/houses). It also seems inevitable that a proportion will need some assistance and/or adaptations. An increase in the provision of accessible and adaptable homes will provide older people with more choice and reduce the reliance on sheltered accommodation to meet their needs.
- 3.53 Hence, there is a strong argument for requiring new housing to be accessible and adaptable, especially for affordable homes and for policies, as well as the allocation of specific sites, that will address the provision of a variety of housing types for older people.

## The housing needs of people with disabilities

- 3.54 The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in ensuring that they live safe and independent lives. People with disabilities are defined for planning purposes in the NPPF's Glossary. It includes people with a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.



- 3.55 Whilst available data sources can provide a good indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home. Across the borough, the HNS identified that 30.8% of households contained at least one person with an illness/disability. The most frequently mentioned illnesses/disabilities were physical or mobility impairment, at 8.1% of all households, and longstanding illness or health condition, at 7.7%.
- 3.56 The HNS found that, overall, 5.3% of all properties across the borough have been adapted or purpose-built for a person with a long-term illness, health problem, or disability. It noted that national data suggests that around 3.3% of households contain at least one wheelchair user.
- 3.57 Given the correlation between an ageing population and the increase in the number of people with disabilities, the provision made in the Local Plan for residential care housing will also meet some of the needs for people with disabilities. Provision of accessible and adaptable housing that meet the Building Regulations optional technical standards will also help to address the needs of younger residents living with disabilities who may require a lower level of care.
- 3.58 In conclusion, the HNS support provision of accessible and adaptable housing (M4(2)), with specific provision being made for wheelchair accessible/adaptable (M4(3)) homes, of the order of 5% of total supply.

## The housing needs of Gypsies, Travellers and Travelling Showpeople

- 3.59 Gypsies, Travellers and Travelling Showpeople are defined for planning purposes in the Government's 'Planning Policy for Traveller Sites' (PPTS). This also sets out the need for local plans to assess pitch requirements for Gypsies and Travellers, and plots for Travelling Showpeople, and to make suitable provision that facilitates the traditional and nomadic way of life while respecting the interests of the settled community. This includes providing a settled base that reduces the need for long-distance travelling and possible environmental damage from unauthorised encampments.
- 3.60 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2018 ([see GTAA](#)). The number of pitches in the GTAA within Tunbridge Wells borough, as at July 2018, as compared with the Caravan Count carried out in July 2018, are shown in the table below:

Table 6: Existing number of Gypsy and Traveller Pitches in Tunbridge Wells borough as at July 2018

<b>Existing supply of pitches</b>	<b>GTAA</b>	<b>July 2018 Caravan Count</b>
Permanent Public Pitches	9	9
Permanent Private Pitches	45	42
Temporary Pitches (all private)	1	1
Unauthorised Pitches	0	0

3.61 In relation to the above, it is the case that the July 2018 caravan count (as for all such biannual counts) reflect ‘a moment in time’. The number of pitches at a site can vary over time, reflecting the transient nature of the lifestyle of the occupants.

3.62 The GTAA assessed needs over the period 2017-2037. Its summary of accommodation needs is split for different time periods, as below:

Table 7: Summary of GTAA assessed need (pitches) 2017 - 2037

<b>Period</b>	<b>Pitches required</b>
2017-2022	15
2022-2027	5
2027-2032	6
2032-2037	6
<b>Total (20 years) 2017-2037</b>	<b>32</b>

3.63 While the GTAA covered the period 2017-2037, it is noted that the Regulation 19 Pre-Submission Local Plan covers the period 2020-2038. For the purpose of addressing the GTAA need in the Local Plan, the Plan will address the need from 2017-2020 as well as to 2037. With regard to the extra year (i.e. 2037-2038), it is noted that the GTAA identified a need for additional pitches at the rate of 6 pitches for each of the 2 final 5-year assessment periods (i.e. 2027-2032 and 2032-2037). Based on this estimated additional need (that remains at the same rate for the second half of the period covered by the GTAA, being just over one pitch per year), one additional pitch has been added for the one-year period 2037-2038

3.64 Therefore, the Local Plan should make provision for 33 pitches (32 pitches identified in the GTAA (2017-2037) plus an additional pitch to reflect the extension of the Local Plan period to 2038).

3.65 These figures are based on households that have not permanently ceased to travel or have ceased to travel for health or family reasons. The need for those who

currently travel is lower, at 24 pitches over the whole period. However, this latter figure is not regarded as fully meeting the PPTS definition of gypsies and travellers.

- 3.66 The GTAA goes on to consider how the identified need may be met. It recommends that the most appropriate way of meeting the identified need, which stems from the growth of existing families within the borough, should largely be through the intensification and/or expansion of existing sites. However, it cautions that, for some sites, this may not be appropriate, including where the expansion or intensification of a site may result in a site that is considered to be too large.
- 3.67 The GTAA advises that further capacity could also be met by granting full planning permission to occupiers residing on sites with temporary planning permission, and also by reviewing appeal decisions.
- 3.68 It follows that the Local Plan should consider the scope for existing sites to accommodate additional pitches, supported by a criteria-based planning policy, and possibly supplemented by site allocations. The most suitable approach for each site will, of course, need to be informed by a full planning assessment of each site, as well as having regard to the future intentions and needs of current occupiers. Further consideration of the potential sources of supply of additional pitches will be given in the Housing Supply and Trajectory Topic Paper.
- 3.69 The GTAA noted that there were only a small number of unauthorised pitches in recent Caravan Counts, which may reflect an absence of transit site demand. The majority of unauthorised pitches have been located at an existing gypsy and traveller site. Indeed, the most recent Caravan Count, for January 2020, shows only 2 unauthorised pitches.
- 3.70 Given the low number of unauthorised encampments, combined with that they tend to be seasonal, there appears little need for the provision of formal, separate transit sites to be made in the Local Plan. The GTAA did not identify a specific transit site pitch need, given the low occurrence of unauthorised encampments in Tunbridge Wells borough. However, TWBC is cooperating with neighbouring Kent authorities and Kent County Council in accordance with the Duty to Cooperate (as a Kent-wide issue) in clarifying and supporting wider transit site provision.
- 3.71 Further consideration may be given, working with other local authorities and the police across the county, to agree potential 'negotiated stopping places' for small-scale transit sites. Such agreements may not require planning permission if they are in use for fewer than 28 days in a year.
- 3.72 In relation to Travelling Showpeople, as there are no known yards in the area, nor any Travelling Showpeople who have registered an interest in moving into the area, no need for such yards is identified.

# The need for self-build and custom housebuilding opportunities

3.73 The NPPF outlines that the housing need for self-build and custom housebuilding should be assessed and reflected in local planning policies (paragraph 61). It notes, at footnote 26 to this paragraph, that:

*“Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.”*

3.74 Within the Self-Build and Custom Housebuilding Act 2015, self-build and custom builds are defined in terms of where an individual, and/or an association of individuals (including bodies corporate that exercise functions on behalf of associations of individuals) is seeking to acquire serviced plots of land in an authority’s area in order to build houses for those individuals to occupy as homes ([see page 1 of the Self-Build and Custom Housebuilding Act](#)). Serviced plots of land required to meet such need - and to be planned for by the local authority in planning policy - are defined as “a plot of land which satisfies such requirements about utilities and other matters as may be specified” (page 3 of the Act).

3.75 As of 01 April 2016, the Borough Council, as the local planning authority, has a statutory responsibility to keep a Self-Build and Custom Housebuilding Register for the borough. The purpose of the Register is to provide the Council with valuable information on the demand for self-build and custom housebuilding in the local area. This information forms a key part of the Council’s evidence base of the demand for this type of housing.

3.76 For the Self-Build and Custom Housebuilding Register, there are general eligibility requirements for individuals/groups wishing to make a registration. Each individual applicant, and every member of an association that applies to go on the Register, must meet the following criteria:

- Aged 18 or older;
- A British citizen, a nation of an EEA State other than the United Kingdom, or a nation of Switzerland; and
- Seeking (either alone or with others) to acquire a serviced plot of land in the relevant authority’s area to build a house to occupy as that individual’s sole or main residence.

- 3.77 In June 2020, the Borough Council also approved, following consultation, the implementation of a local connection test to its Self-Build and Custom Housebuilding Register. This resulted in the splitting of the Register into two parts. Part 1 lists all those people on the Register who meet the local connection test criteria, and Part 2 lists all those people on the Register who do not meet the local connection test criteria. All those people on the Register were contacted following the implementation of the local connection test to update their details and, in accordance with the Regulations, removed all those who did not respond or who requested to be removed from the Register.
- 3.78 Since the introduction of the Register, there have been five “base periods” where applicants have registered a demand in the borough (from 01 April 2016 to 30 October 2020). All subsequent base periods will run from 31 October to 30th October each year.
- 3.79 At the end of each base period, a local planning authority has three years in which to permission an equivalent number of plots of land which are suitable for self-build and custom housebuilding as there are entries for that base period.
- 3.80 The following tables below provide an overview of the self-build and custom housebuilding need identified through registrations made to the Council’s Register over the first five base periods including for both Part 1 and Part 2 of the Register:

Table 8: First Base Period (01 April 2016 to 30 October 2016)

	Total	Part 1	Part 2
Number of individuals placed on the Register between 01 April and 30 October 2016		15	0
Number of associations of individuals (groups) placed on the Register between 01 April and 30 October 2016	0	0	0

Table 9: Second Base Period (31 October 2016 to 30 October 2017)

	Total	Part 1	Part 2
Number of individuals placed on the Register between 31 October and 30 October 2017	25	22	3
Number of associations of individuals (groups) placed on the Register between 31 October 2016 and 30 October 2017	0	0	0

Table 10: Third Base Period (31 October 2017 to 30 October 2018)

	Total	Part 1	Part 2
Number of individuals placed on the Register between 31 October 2017 and 30 October 2018	21	20	1
Number of associations of individuals (groups) placed on the Register between 31 October 2017 and 30 October 2018	0	0	0

Table 11: Fourth Base Period (31 October 2018 to 30 October 2019)

	Total	Part 1	Part 2
Number of individuals placed on the Register between 31 October 2018 and 30 October 2019	26	17	9
Number of associations of individuals (groups) placed on the Register between 31 October 2018 and 30 October 2019	0	0	0

Table 12: Fifth Base Period (31 October 2019 to 30 October 2020)

	Total	Part 1	Part 2
Number of individuals placed on the Register between 31 October 2019 and 30 October 2020	47	34	13
Number of associations of individuals (groups) placed on the Register between 31 October 2019 and 30 October 2020	0	0	0

- 3.81 Consequently, as of 30 October 2020, following the introduction of a local connection test in June 2020 and a review of the Register, there are 134 applicants on the Register, of which 108 are on Part 1 (meet the local connection test criteria) and 26 are on Part 2 (do not meet the local connection test criteria). It is the need of those on Part 1 (i.e. 108 registrations) that the Local Plan will address; however, the Council may still inform those on Part 2 of any relevant opportunities.
- 3.82 For the purpose of calculating need for the Local Plan, it is appropriate to project need (based on the number of Part 1 registrations) across the whole Plan period (to 2038), to ensure that a sufficient and constant supply of self-build and custom housebuilding plots are provided to take into account the potential for additional registrations to the self-build and custom housebuilding Register in future years/base periods.

3.83 As shown in **Table 13**, drawing on the Register’s first five base periods (01 April 2016 – 30 October 2020), the average number of monthly registrations since the Register was introduced (based on the number of those people on Part 1 of the Register) equates to 1.96 per month. Including current need (108), if projected forward to the end of the Plan period (April 2020 - March 2038, equating to 209 months), this results in an indicative projected need of approximately 518 (108 on Part 1 plus 410 projected number of additional registrations) self-build and custom housebuilding dwellings.

Table 13: Calculation of Self-Build and Custom Housebuilding Need Over the Plan Period (2020-2038)

1	Total number of months since Register has been active (April 2016 – October 2020)	55
2	Number of applicants on Part 1 of the Register (as of 30 October 2020)	108
3	Average number of registrations per month to-date (row 2 divided by row 1)	1.96
4	Total number of months remaining within Plan period (November 2020 – March 2038)	209
5	Projected number of additional registrations within Plan period (row 4 multiplied by row 3)	410
6	Self/custom build need (row 2 (current) + row 5 (projected))	<b>518</b>

3.84 The Housing Supply and Trajectory Topic Paper will further consider how this self-build and custom housebuilding need will be addressed in the Local Plan.

## The need for a proportion of smaller housing sites

3.85 The NPPF requires local plans to promote small and medium sized sites as a means of meeting the housing requirement of an area to ease over-reliance on large sites that often take time for delivery to start. As such, local planning authorities should aim to:

*“identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;” (paragraph 68).*

3.86 To calculate this target from the base date of the Local Plan (i.e. 01 April 2020), the overall housing target (12,204) is divided by 10 to get the 10% minimum figure. On this basis, the Local Plan should therefore identify land for at least 1,220 dwellings on sites of no more than one hectare.

3.87 This will consequently be addressed in the Housing Supply and Trajectory Topic Paper as a particular housing need that the Local Plan should accommodate.



# 4.0 Summary of Particular Housing Needs

4.1 Part 1 of this Paper finds that the overall housing need for the borough that the Local Plan should, as a minimum, aim to meet, is 678 dwellings per year. In meeting this need, the NPPF also expects plans to meet the needs of particular groups, as reviewed above. In summary, the needs identified for these groups are:

a) Affordable housing

It is evident that the borough has, and will have, a high need for affordable housing, both in absolute terms and relative to overall housing need, such that the Local Plan should look to maximise the supply of affordable homes.

To help meet this need will involve both setting a relatively high affordable housing requirement – 40% on greenfield sites and 30% on brownfield sites is recommended – and by having a low threshold in terms of the size of developments the requirement applies to. On balance, the national policy in the NPPF in terms of the minimum threshold size of sites to secure affordable homes, namely 10 dwellings (and six dwellings in AONBs), is followed.

The analysis suggests that the greater proportion of affordable homes, 60%, should be rented, with the remaining proportion being intermediate products. In fact, in order to prioritise meeting the greatest housing needs, social rented homes should be the norm in terms of rented affordable housing.

b) Private rented housing

It is found that private rented housing forms an increasing component of the housing stock. However, no targets are set. Rather, the attention is on monitoring accommodation quality, particularly of shared accommodation.

c) Housing for older people

With an ageing population, meeting the housing needs of older people will require providing more specialist housing, as well as ensuring that dwellings are, as far as practicable, capable of meeting changing needs over time. Hence, it identifies a strong argument for requiring new housing to be accessible and adaptable, especially for affordable homes, whilst also supporting a range of specialist accommodation in suitable locations.

d) Housing for people with disabilities

The analysis supports provision of accessible and adaptable housing (M4(2)), with specific provision being made for wheelchair accessible/adaptable (M4(3)) homes, of the order of 5% of total supply.

e) Gypsies, travellers and travelling showpeople

There is an estimated need for a further 31 permanent pitches over the plan period against the need of 33 (GTAA need of 32 pitches plus an additional pitch to reflect the extension of the plan period from 2037 to 2038) which takes into account the two pitch completions prior to the base date of the plan period. It is recommended that this be, and may be, predominantly met through the intensification, expansion, and/or regularisation of existing sites, as well as potentially new sites, supported by a criteria-based policy.

No need for a designated transit site, or unmet need for plots for travelling showpeople, is identified.

f) Self-build and custom housebuilding

There is an identified need for approximately 518 serviced plots for self-build and custom housebuilding over the Local Plan period. This need is reflective of the current level of need on Part 1 of the Register at 30 October 2020 (108), as well as this need projected forward from November 2020 to the end of the plan period (410).

g) Smaller housing sites

The report identifies the minimum number of dwellings (being 1,220) that the Local Plan should identify on sites of one hectare or less, to meet the NPPF requirement (at paragraph 68a) for at least 10% of the housing requirement being met by smaller sites.

4.2 Finally, it is highlighted that housing needs over the plan period will be reviewed in advance of the submission version of the Local Plan, to have regard to any more up-to-date information and levels of identified need.

# Appendices

# Appendix 1: Application of the ‘Standard Method’ to assessing the housing need for Tunbridge Wells borough

(NB: Guidance on the steps to be followed, as set out in the Planning Practice Guidance on ‘Housing and economic needs assessment’, is reproduced in the text boxes below.)

## Step 1 - Setting the baseline

Set the baseline using national household growth projections, (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded, and individual cells need to be viewed in order to see the full number.

Figures for Tunbridge Wells in the Live Tables over the period up to 2036 are:

### Tunbridge Wells

<b>2019</b>	50,942
<b>2020</b>	51,450
<b>2021</b>	51,926
<b>2022</b>	52,410
<b>2023</b>	52,897
<b>2024</b>	53,404
<b>2025</b>	53,882
<b>2026</b>	54,364
<b>2027</b>	54,847
<b>2028</b>	55,329
<b>2029</b>	55,814
<b>2030</b>	56,293
<b>2031</b>	56,761
<b>2032</b>	57,211
<b>2033</b>	57,661
<b>2034</b>	58,116
<b>2035</b>	58,570
<b>2036</b>	59,039

It can be seen that the projected average annual household growth over 10 years, beginning with the current year (2019) is 487 dwellings per year (note: 55,814 (2029) minus 50,942 (2019) = 4,872 divided by 10 years = 487 per annum). However, the Guidance advises that the figure should be kept under review and revised where appropriate. Moreover, it adds that the figure applicable at the time of submission may be relied upon for a period of two years from the time that a plan is submitted to the Planning Inspectorate for examination ([see PPG Housing and Economic Development Needs Assessments Paragraph: 008 Reference ID: 2a-008-20190220](#)). Therefore, it is sensible to use this figure (i.e. taking the 2020-2030 period) for the calculation for the Local Plan's housing need at this stage.

On this basis, for the 10-year period 2020-2030, the baseline calculation is 56,293 (2030) minus 51,450 (2020) = 4,843 divided by 10 = **484 dwellings per year**.

## Step 2 - An adjustment to take account of affordability

Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area.

The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used.

No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4, the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

For Tunbridge Wells, the adjustment factor in Table 5c (using the 2018 affordability ratio) is (12.76 minus 4) divided by 4) multiplied by 0.25) + 1 = 1.5475

The full formula would be adjustment factor multiplied by the baseline figure, i.e.

1.5475 multiplied by 484 = **749 dwellings per year**

## Step 3 - Capping the level of any increase

A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

Where these policies were adopted within the last five years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

This also applies where the relevant strategic policies have been reviewed by the authority within the five year period and found to not require updating.

For areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy. For example, where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure in the spatial development strategy should be used.

Where the relevant strategic policies for housing were adopted more than five years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10-year period identified in step 1; or
- b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

The last paragraph is relevant to Tunbridge Wells.

- a. The figure from step 1 is 484.
- b. The average annual housing requirement in the Core Strategy was 300.

As the larger of the two figures is 484, the annual requirement is 484 + the 40% cap, which is 678.

As the capped figure of 678 is lower than the uncapped figure of 749 under the Standard Method, **the minimum number of homes expected to be planned for in a way which addresses projected household growth and historic under-supply in the new Local Plan for Tunbridge Wells borough is expected to be 678 dwellings per year.**

## Housing delivery test

To calculate the total net homes required over the three-year period the calculations draw on:

- Annual average household growth over a 10-year period.

This is calculated for each of the test years by authority based on household projections.

The household projections used for each test year are: 2012-based in 2015/16; 2012-based in 2016/17; and, 2014-based in 2017/18;

For Tunbridge Wells, this is:

Table 14: Housing Delivery Test housing targets for Tunbridge Wells borough

<b>2015/16</b>	549 (pro rata'd with three months from the Core Strategy)
<b>2016/17</b>	612
<b>2017/18</b>	494
<b>2018/19</b>	487
<b>2019/20</b>	484

The first three years' numbers can be found below ([see Housing Delivery Test: 2018 measurement](#)).

The homes delivered can be found through the same link, and are calculated by the individual Local Authorities, based on how many units have been delivered, with a separate calculation for communal accommodation and student accommodation.

- Local plan information; both the most recent local plan and the previous local plan.

Only local plans which set out an authority's housing requirement are used. Data collected includes: the adoption date, start date, end date, housing requirements including trajectories, joint plan requirements, traveller requirements, and any unmet need which has been given to or taken from other authorities; and,

For every local planning authority, the steps below were taken:

1. For every local authority annual average household growth over ten years is calculated based on the household projections available as at 1st April in each test year.
2. In some cases annual average household growth may be negative for one or more of the years being tested. In these instances, all three years of the household growth including negative values are summed. If the three-year summed result is a negative value, this is set to zero. If the sum of the three years of annual household growth is positive (despite one or more negative years), the figure is not changed.

3. Net unmet need is calculated for each authority by summing all the need taken (the authority becomes responsible for delivering this housing) and taking away all need given (the authority is no longer responsible for this housing).
4. To convert this into an annual figure, the number of years the plan covers is calculated by taking the difference between the start date of the plan and the end date of the plan; classifying both the start date and end date as days the plan covers. The total net unmet need figure by authority is then divided by the total plan period.
5. The annual net unmet need for each authority is then added to the annual average household growth for each test year.

In addition to steps 1 to 5, for an authority with an 'up to date' local plan which expired during the Housing Delivery Test period the steps below were taken:

1. The housing requirement is based on the annual target from the most recent plan for each year. If the local plan includes a stepped requirement then the annual target from the requirement corresponding to the relevant period is used, and the steps below are applied in the same way.
2. If the plan becomes out of date then from this point onwards the housing requirement is based on annual average household growth plus unmet need.
3. If the plan becomes out of date midway through a year, a weighted average for that year is calculated. This means that for as many days that the plan was 'up to date' within a test year, the annual target is used. For the remainder of the year, annual average household growth plus unmet need is used.
4. The number of homes required each year over the three-year period is based on the lower of the housing requirement or household growth plus unmet need in each year.
5. In this instance, the housing requirement in a given test year could be: a. The target from the plan (if the plan is 'up to date' for the full year); b. A weighted average of the target from the plan and annual average household growth plus unmet need (if the plan is only 'up to date' for part of the year); or, c. Household growth plus unmet need (if the plan is out of date for the full year).
6. For each individual year that the annual target is greater than annual average household growth plus unmet need, the lower figure is used.
7. The final number of homes required sums each year's lower figure to calculate the three-year total number of homes required.



8. Similarly to the above, if an authority adopts a plan which covers the latter part of the Housing Delivery Test period then prior to the period the plan covers, annual average household growth plus unmet need is used. From the point following the plan start date, the housing target from this is used (using the relevant stepped requirement where appropriate). The “lower of” policy is applied in the same way, comparing the housing requirement in each year to annual average household growth plus net unmet need.

The housing requirement for travellers: In addition to steps 1 to 5 and the relevant process depending on local plan status, where applicable the requirement for traveller accommodation are added to the housing requirement. This addition takes place prior to the application of the “lower of” policy which compares the housing requirement (containing the travellers housing requirement) and the annual average household growth plus net unmet need, choosing the lower for each year as the number of homes required for that test year. The travellers housing requirement is calculated through the steps below:

1. The travellers accommodation requirement is based on the travellers annual target from the most recent plan for each year. If the local plan contains no travellers requirement then no adjustment is made.
2. Where there is a travellers requirement and the plan becomes not ‘up to date’ then from this point onwards the travellers adjustment is no longer made.
3. If the plan becomes not ‘up to date’ midway through a year, then for as many days that the plan was ‘up to date’ within a test year, the travellers annual target is used (apportioned based on how many days this was ‘up to date’). For the remainder of the year, no travellers housing requirement is added.
4. If the local plan includes a stepped requirement for the travellers requirement, then the annual target from the requirement corresponding to the relevant period is used, and the steps above are applied in the same way.

# Appendix 2: Housing tenure by parish (2011 Census)

Table 15: Housing tenure by parish (2011 Census)

	Number of households	Owned (outright or mortgage)	Shared ownerships (part owned and part rented)	Social rented	Private rented	Living rent free
Benenden and Cranbrook	2,917	1,842	43	547	377	108
Brenchley and Horsmonden	2,036	1,571	6	192	231	36
Broadwater	1,963	1,146	10	505	284	18
Capel	918	638	4	130	129	17
Culverden	4,081	2,198	66	159	1,628	30
Frittenden and Sissinghurst	847	627	4	92	94	30
Goudhurst and Lamberhurst	1,854	1,229	7	264	307	47
Hawkhurst and Sandhurst	2,580	1,825	11	371	330	43
Paddock Wood East	1,771	1,244	7	247	253	20
Paddock Wood West	1,509	1,157	14	254	74	10
Pantiles and St Mark's	2,991	2,101	9	182	671	28
Park	3,327	2,282	18	284	699	44
Pembury	2,400	1,778	9	387	198	28
Rusthall	2,076	1,280	11	515	246	24
St James'	2,844	1,476	33	497	819	19
St John's	2,864	1,988	42	262	544	28
Sherwood	3,001	1,573	27	1,101	275	25

	<b>Number of households</b>	<b>Owned (outright or mortgage)</b>	<b>Shared ownerships (part owned and part rented)</b>	<b>Social rented</b>	<b>Private rented</b>	<b>Living rent free</b>
Southborough and High Brooms	3,111	1,894	45	704	441	27
Southborough North	1,781	1,273	7	291	183	27
Speldhurst and Bidborough	2,303	1,877	3	164	212	47
<b>Borough as a whole</b>	47,174	30,999	376	7,148	7,995	656
<b>Borough as a whole (%)</b>	100%	65.71	0.80	15.15	16.95	1.39

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