



Phase 2

Tunbridge Wells Borough Council

Local Plan Examination in Public

**Hearing Position Statement - Matter 2 - Housing and Employment Needs
(Policy STR1)**

Submitted on Behalf of Rosconn Strategic Land Ltd

March 2022

Our Ref: C22026

Phase 2 PLANNING & DEVELOPMENT LIMITED

270 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA | 01376 329059 | www.phase2planning.co.uk

Quality Assurance

Site Name: Land south of Benchley Road, Horsmonden

Client Name: Rosconn Strategic Land Ltd

Type of Report: Representations to the Examination in Public

Author	Initials	Date
Lisa Skinner BSc (Hons) MA DipMgt MRTPI Director	LS	March 2022

Reviewed	Initials	Date
Samantha Stephenson BA (HONS), MScTP, MRTPI Principal Planner	SS	March 2022



Contents

1. Introduction	1
2. Matter 2 Housing and Employment Needs (Policy STR1)	2

1. Introduction

- 1.1 This Statement has been prepared on behalf of our client, Rosconn Strategic Land Ltd who has a promotion agreement with the landowner on 3.6 ha of land to the south of Brenchley Road and west of Fromandez Drive, Horsmonden, Kent.
- 1.2 The site has been promoted through the emerging Local Plan process and is now identified as a draft allocation within the Tunbridge Wells Borough Submission Local Plan 2020-2038 (Submitted October 2021), hereafter referenced as “The Plan”. The site is identified as Draft Policy AL/HO2 for residential development providing approximately 80-100 dwellings, a replacement village hall and associated parking.
- 1.3 In this submission, we respond specifically to Matter 2 Housing and Employment Needs (Policy STR1) that covers the following:

Issue 1 Housing Needs and the Housing Requirement - Questions 1 to 6

Issue 2 – Affordable Housing Needs, Questions 1 to 3

2. Response to the Inspector's Questions

Issue 1 – Housing Needs and the Housing Requirement

To determine the minimum number of homes needed, paragraph 61 of the National Planning Policy Framework ('the Framework') states that 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.

Q1. What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the national Planning Practice Guidance ('the PPG')?

- 2.1 The Council has identified that 678 dwellings per year are required across the Borough over the full plan period 2020-2038 equating to a need of 12,200 dwellings. The original evidence base that informed the Regulation 18 Plan has been updated in February 2021 to take into account comments made and to ensure an accurate assessment has taken place to inform the Plan. Whilst it is acknowledged that different assumptions may lead to a various outcomes on the level of housing need, the Council has ensured that a robust approach has been taken in relation to the methodology. They have appointed independent consultants to carry out assessments of the methodology and review the evidence base in line with Government guidance. The Council has confirmed that they intend to meet in full, the assessed local housing need for the area along with a "buffer" for flexibility. We therefore support the Council's approach.
- 2.2 Our response to Question 3 below, is also relevant to this question as it addresses the position in relation to whether the housing need in other areas should also be considered. These areas are subject to similar significant environmental constraints in relation to Green Belt and AONB. There are therefore limited options for either the Council to accommodate other authorities housing need or to seek assistance from neighbouring areas to meet their need. It is therefore appropriate for the Council to meet its own need. This balanced approach has been supported by Inspector's elsewhere in the country in particular the Guildford Local Plan which is an area subject to similar constraints to Tunbridge Wells.

Q2. Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?

- 2.3 The Council has sought independent guidance from consultants to assess the evidence base and provide guidance on the robustness of using the standard method. This included a review

of local housing needs by Icen Projects Limited. The Council has concluded there are no exceptional circumstances that would justify an alternative approach to the standard methodology and we agree with this conclusion. We therefore support the Council's view that there are not exceptional circumstances which justify an alternative approach.

Q3. In addition to the local housing need figure for Tunbridge Wells, should the Plan also make provision for housing needs that cannot be met in neighbouring areas? If so, what should that figure be?

- 2.4 The Council, as evidenced within the submission for the Plan has engaged with neighbouring councils. The Duty to Cooperate (DTC) Statement (March 2021) confirmed engagement with Sevenoaks District Council (SDC), Tonbridge and Malling Borough Council (TMBC), Rother District Council (RDC) and Wealden District Council (WDC). At that time only SDC indicated they did not expect to meet their local housing need. However, SDC's own emerging local plan has failed at examination, and they are now in the process of preparing a new evidence base that will support a new emerging local plan. Until this evidence base is available, the actual need has not been identified or whether it could be met within SDC itself. We therefore agree with the Council that there is not a requirement to meet housing needs in neighbouring areas.

Q4. Will the plan period look ahead over a minimum 15-year period from adoption, as required by paragraph 22 of the Framework?

- 2.5 Paragraph 2.3 of the Housing Needs Assessment February 2021 confirms that the plan period will be extended to March 2038 to provide 15.75 years from the anticipated date of adoption.

At the heart of the Framework is a presumption in favour of sustainable development (paragraph 10). For Plan-making, paragraph 11b) states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless

i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

The policies referred to in paragraph 11b) relate to, amongst other things, land designated as Green Belt and Areas of Outstanding Natural Beauty ('AONB's).

Q5. Do policies relating to the Green Belt and/or the High Weald AONB provide a strong reason for restricting the scale of development in Tunbridge Wells?

(² Inspector's Note – A similar question is asked under Matter 3 (Spatial Strategy) and the Council may wish to address both in the same response to avoid any duplication.

2.6 No comment.

Q6. Is the housing requirement justified, having particular regard to areas of Green Belt and AONB across Tunbridge Wells?

- 2.7 The Council has clearly identified a variety of constraints that restrict development in the area that include in particular the Green Belt, the High Weald Area of Outstanding Natural Beauty (AONB) and areas of high flood risk. In Section 2 of the Plan, the Council identifies the significant issue of affordability within its jurisdiction which has gradually worsened. In respect of housing prices, Tunbridge Wells Borough continues to have higher average house prices than the rest of Kent and the South East region (as based on Land Registry House Prices 2019). The background evidence confirms that the average price of a house in Tunbridge Wells has increased by £195,753 (an increase of 73%) which is well above other areas across Kent and the South East of England that have seen increases of 62% (£127,004) and 64% (£145,447) respectively.
- 2.8 Paragraph 2.18 of the Plan, Figure 4 shows that in 2019, “... entry level house prices were approximately 12 times the (workplace based) earnings of households in the borough, representing around a 38% increase since 2009, from around eight times the earnings.” In addition, figures produced by Kent County Council, (statistics 2019) show that it is also more expensive to rent in the Borough.
- 2.9 The Borough is subject to significant constraints, but adjoining authorities are also subject to similar constraints. If the Council does not seek to meet the identified housing need, the affordability position in relation to market and affordable housing will continue to worsen due to supply and demand. This would not only have a social impact but an economic impact that would be contrary to the sustainability approach outlined within the NPPF. We therefore fully support the Council's intention to meet in full, the local housing need.
- 2.10 The Council has thoroughly considered the appropriate strategy for growth in the Borough. This has included technical assessments of land within the Green Belt and AONB and other areas outside these designations that could accommodate growth. This has led to Horsmonden being identified as a suitable village for housing growth and this will include new market and affordable housing. We believe the level of housing provision is justified and support the Council's approach.

Issue 2 – Affordable Housing Needs

Q1. What is the annual net need for affordable housing? For clarity to decision-makers, developers and local communities, should the need for affordable housing be clearly set out in the Plan?

- 2.11 Paragraph 3.10 of the Housing Needs Assessment Topic Paper for the Pre-Submission Local Plan, February 2021 suggests an annual need for around 323 affordable homes, 60% social rented and 40% intermediate tenures. A further update has been provided in *“The impact of Review of affordable housing needs in the context of ‘First Homes’ (2021)”*. Paragraph 3.25 confirms a need of 363 affordable homes per year and paragraph 3.26 suggests some of the housing should be affordable home ownership and the 25% First Homes would fall within this category.
- 2.12 It is important that the Council clearly sets out the approach within the policy in relation to whether the inclusion of 25% First Homes falls within the affordable home ownership category. In addition, it should be clear how the discount would be calculated and applied as this could impact viability.

Q2. Has the need for affordable housing been accurately established and is it based on robust, up-to-date information?

- 2.13 The Council has undertaken three separate studies including the latest, *“Review of affordable housing needs in the context of ‘First Homes’ (2021)”* all of which conclude there is a substantial need for affordable housing in excess of 300 units a year in particular for rented accommodation.

Q3. How does the need for affordable housing compare to the housing requirement? Based on the thresholds and requirements in Policy H3, will affordable housing needs be met?

- 2.14 Due to the scale of affordable housing that is required, it is unlikely that the overall need will be met in the Plan period. The provision of affordable housing is intrinsically linked to new development and therefore it is essential that new development comes forward that will contribute to addressing this issue. As acknowledged by the Council, small and medium sized sites can contribute to need and deliver quickly as they are not constrained by major infrastructure and funding issues. Our site, AL/H02 is committed to providing 40% on site affordable housing provision and is deliverable within the first 5 years of the Plan period. The thresholds set within the Plan are considered appropriate.



Phase 2

PLANNING &
DEVELOPMENT
LIMITED