

MRPP

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**HEARING STATEMENT ON
BEHALF OF TESCO STORES
LIMITED**

**MATTER 8 – HOUSING FOR
OLDER PEOPLE**

MAY 2024

MATTER 8 – Meeting Housing Needs

Issue 3 – Housing for Older People and People with Disabilities

Q1. Considering the conclusions reached in paragraphs 89-92 of the Inspector’s Initial Findings, how can the Plan be modified to rectify the soundness issues identified?

Q2. What implications will the Council’s suggested changes to the Plan have on the provision of housing to meet the needs of older people and people with disabilities?

Q3. In the event that needs will not be met, how can the Plan be modified in order to make it sound?

MRPP Response

1. The Inspector in his Initial Findings (November 2022) confirms at paragraph 91 that a useful summary of the evidence relating to ‘Housing for Older People’ is that provided within Examination Document TWLP_032a. The Inspector then acknowledges that the Plan should be modified so as to “*clearly set out the gross need for extra care housing based on the two methods used (as per the tables in Examination Document TWLP_032a which show a range between 342 and 431 units)*”, see paragraph 92.
2. The appendix to Examination Document TWLP_032a confirms that the need, based upon the KCC Model, at 2038 is 342 extra care units, whilst based upon the SHOP@ Rate it is 431 extra care units. These are the figures that the Inspector identifies at his paragraph 92, as set out above. The appendix also therefore confirms that there are between 159 – 248 units needed over the plan period. The Council’s Local Plan Development Strategy Topic Paper – Addendum (January 2024) reconfirms these figures.
3. The Council at paragraph 13.11 of their Topic Paper Addendum (January 2024) list all sites with planning permission and site allocations for extra care housing, taking into account the removal of Tudeley Village, which will meet the need under both the KCC Model and SHOP@ Rate. This includes our client’s site at Woodsgate Corner.
4. As set out in our previous representations, in order to make the Plan sound i.e. that it is positively prepared (seeking to meet the area’s objectively assessed needs) and effective (deliverable over the plan period), in response to the Inspector’s Question 1, it is necessary for the identified need for housing for older people to be quantified within Policy H6 (as per the figures set out above). It is

also necessary that a list of those permissions and allocations, including the Woodsgate Corner allocation, is included within the Policy to demonstrate how this need will be met.

5. Our client's site at Woodsgate Corner is proposed to be allocated for either extra care or a care home under draft allocation AL/PW 6. Our client has confirmed that the intention is to develop this site for uses including extra care, subject to market demand. As set out above, the Council have listed the site within the numbers contributing towards extra care provision and we do not raise any concern with its inclusion in this respect.
6. Although the allocation refers to both extra care housing and a care home, to provide the flexibility to facilitate development of the site, it should not however be taken as any indication that the site could not provide extra care housing. There is no reason to consider that the site is more suited to a care home. Although located to the south of an existing supermarket car park, this would not prevent the site from being suitable and deliverable for extra care.
7. It is acknowledged that the site at Sandown Park, advanced by Pro Vision on behalf of Cooper Estates Strategic Land Ltd, has not been taken forward through the Local Plan as an allocation for extra care housing. The site is located within the Green Belt with this parcel identified within the Council's Green Belt Study as forming the "*major part of the narrow gap between Tunbridge Wells and Pembury*". Development of the site would therefore not accord with one of the purposes of the Green Belt, as set out at paragraph 143 of the NPPF, in terms of preventing neighbouring towns merging into one another. The site is thus unsuitable for allocation due to the harm to the Green Belt.
8. With the above in mind, we write to reiterate the suitability of our client's site at Woodsgate Corner to be allocated for uses including extra care accommodation. Our client is the freehold owner of the site. The proposed allocation's scale of development (80 units of extra care or up to 120 units of residential care home) can readily be accommodated within the available site. There are no constraints of significance. The site is generally level and has a good access arrangement and it is thus suitable to deliver such provision.