

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 8: Meeting Housing
Needs (Policies H1, H2, H3,
H4, H5, H6, H7, H8, H9, H10,
H11 and H12)
Issue 1: Housing Mix**

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Matter 8 – Meeting Housing Needs (Policies H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and H12)

Issue 1 – Housing Mix

Inspector’s Question 1: [re. clarity of policy requirements]

Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H1?

TWBC response to Question 1

1. Policy H1 Housing Mix is regarded as clear, in that it sets out the guiding principle that:
“Proposals for residential development should support the creation and maintenance of balanced communities by providing an appropriate housing mix with a range of sizes, types and tenures of dwellings.”
2. Supporting paragraph 6.311 adds: *“This policy is not prescriptive, but requires the development proposals to be informed by an analysis of the surrounding area, and for this to be evidenced in the design and access statement submitted as part of the proposals.”* Cross-references are also made to other policies which relate to meeting the housing needs of particular groups, perhaps most notably in relation to affordable housing (Policy H3) and for older people and people with disabilities (Policy H6).
3. The approach is for the dwelling mix in any context to be ‘evidence-led’, being informed by the Council’s and parish surveys/studies and other available intelligence on housing needs and demand, as highlighted in the second paragraph of the policy.
4. The supporting text to Policy H1 references the Housing Needs Study [[CD 3.19](#)]. That document provides useful information on the demand and preferences for different types, sizes and tenures of dwellings relative to the stock profile at both borough and ward/parish level. It states, at paragraph 5.14 that *“This analysis suggests that on the*

basis of household aspirations (likes), the highest demand is for 3 and 4-plus bedroom houses. While demand, expectation and current stock profile are fairly evenly matched for 3-bedroom houses, fewer households expect to achieve a 4-bedroom house than would choose one.”

5. In addition, the Strategic Housing Market Assessment (SHMA) [[CD 3.23](#)] provides overall recommendations for different sizes of homes, both market and affordable, in the borough at Table 3 on page 17, which is reproduced below:

	1-bed	2-bed	3-bed	4+ bed
Market	5-10%	25-30%	35-40%	20-25%
Affordable	35-40%	30-35%	20-25%	5-10%
All dwellings	15-25%	25-30%	30-35%	15-20%

6. While this points to a higher proportion of smaller homes (i.e. less bedrooms) than the Housing Needs Study, the SHMA consultants explain this in terms of a need to deliver more smaller family housing for younger households (paragraph 6.29 on page 127 of the SHMA). It also goes on to say: *“In applying policies on housing mix to individual development sites, the SHMA recommends that regard should be had to the nature of the development site and character of the area, and to up-to date evidence of need as well as the existing mix and turnover of properties at the local level.”*
7. In addition, the recent introduction of First Homes within the scope of affordable housing may have some impact on the size split for market homes, as may any longer-term shift to home working following the Covid pandemic.
8. In all, it is concluded that the housing mix for any individual proposal should have regard firstly to relevant policies (see also response to Question 2 below) and to available evidence on housing needs and demand, as expected by the policy, but without prescription (to maintain flexibility). This may be presented as part of a Design and Access Statement.
9. Given that the SHMA is a key evidence document, on reflection, it is considered appropriate to reference it in paragraph 6.130 of the SLP. Therefore, the Council proposes to put this forward as an ‘additional modification’.

Inspector's Question 2: [re. Regard to the housing needs of different groups]

How has the size, type and tenure of housing needed for different groups in the community been assessed and how is it reflected in planning policies, as required by paragraph 62 of the Framework?

TWBC response to Question 2

Introduction

10. Prevailing national policies and guidance on assessing the housing needs of different groups, as set out in NPPF paragraph 62 and elaborated upon in the PPG on [Housing needs of different groups](#), have provided the backcloth to the following reports prepared during the course of preparing the Local Plan:
- a) Strategic Housing Market Assessment (SHMA), 2015 [[CD 3.23](#)] (also [CD 3.80](#))
 - b) SHMA Update, 2017 [[CD 3.24](#)] (also [CD 3.81](#))
 - c) Housing Needs Study, 2018 [[CD 3.19](#)]
 - d) Gypsy and Traveller Accommodation Assessment, 2018 [[CD 3.17](#)] (also [CD 3.78](#))
 - e) Review of affordable housing needs in the context of 'First Homes', 2021 [[CD 3.76](#)]
 - f) Housing Needs Assessment Topic Paper (for the Pre-Submission Local Plan), 2021 [[CD 3.73](#)]
 - g) Housing Supply and Trajectory Topic Paper (for the Pre-Submission Local Plan), 2021 [[CD 3.74](#)]
11. Further explanation of the main references in these documents to the housing needs of particular groups, as well as to the related policies, is provided below.
12. It is also highlighted that the following overview for all groups is amplified in responses to the Inspector's MIQs relating to specific needs and related policies, under the following Matter 8 Issues 3, 6, 8 and 11.

Assessment of housing needs of groups in the community

13. Part 2 of the Housing Needs Assessment Topic Paper [[CD 3.73](#)] draws together the evidence on housing needs in respect of:

- The need for affordable housing (pages 12-17)
 - The need for private rented housing (page 18)
 - The housing needs of older people (pages 18-22)
 - The housing needs of people with disabilities (page 22)
 - The housing needs of gypsies, travellers and travelling show people (pages 23-25)
 - The need for custom and self-build housebuilding opportunities (pages 26-28)
 - The need for a proportion of smaller housing sites (pages 29-30)
14. Family housing needs are part of the consideration of market and affordable housing needs in the SHMA and the Housing Needs Study.
15. Of the groups identified in NPPF paragraph 62, no specific provision is made for housing for students, as there are no further education establishments in, or close to, the borough that generate a material level of demand for student accommodation. However, the wider need for housing for young people is reviewed in the SHMA and the Housing Needs Study in relation to the private rented sector, the consideration of the role for 'Starter Homes' and, more recently, in relation to 'First Homes', as set out in [CD 3.76](#) (which is considered further under Matter 8, Issue 3 - Affordable Housing [see TWLP/029]).
16. One group not highlighted in NPPF paragraph 62, but for which specific policy consideration is given, is rural workers, being essentially those people who need to live at, or close to, their workplace to support healthy rural enterprises, typically for agriculture but also for forestry and commercial equestrian employment.

Planning policy coverage

17. The Submission Local Plan [\[CD 3.128\]](#) contains specific policies in respect of each of the following:
- Affordable Housing – Policies H3 and H5
 - Housing for Older People and People with Disabilities – Policy H6
 - Rural Worker Dwellings – Policy H7

- Self-Build and Custom Housebuilding – Policy H8
- Gypsies and Travellers – Policy H9

Assessments of housing needs

a) Affordable housing

18. The need for affordable housing has been periodically assessed in the preparation of the Local Plan, initially through both the SHMA and the Housing Needs Study and, most recently, through a further report: Review of affordable housing needs in the context of 'First Homes', 2021. [\[CD 3.76\]](#) The evidence is reviewed in the Housing Needs Assessment Topic Paper [\[CD 3.73\]](#), at pages 12-17, and developed into policy requirements through the Housing Supply and Trajectory Topic Paper. [\[CD 3.74\]](#).
19. The findings of the most recent study provide the principal basis for most of the provisions of Policy H 3 Affordable Housing in the Submission Local Plan (SLP). This is complemented by the findings of viability assessments of options which also looked at the scale, type and tenure mix of different forms of affordable housing. Also, of note, Policy H 3 also draws on advice from the Council's Housing team, especially on tenure, local connection, and the approach to follow under 'exceptional circumstances'.
20. The policy seeks a relatively high contribution - 40% - of affordable homes on eligible (10+ dwellings) greenfield sites (as assessed for viability), which is further boosted by a requirement for financial contributions from smaller sites in the High Weald AONB. The policy recognises the need to secure a mix of tenures and to give priority to those in greatest need. This is done through the policy's requirement for 60% social rented accommodation and 40% provision of intermediate tenures.
21. The need for affordable housing to be suitable for all ages and levels of mobility, with specific provision for households with disability, is also recognised by those components of the policy covering the application of optional technical housing standards relating to accessibility and adaptability.
22. Further elaboration is provided in response to Matter 8, Issue 3 [TWLP/029].

- b) Housing for Older People and People with Disabilities
23. The need for a range of housing for older people was assessed in the preparation of the Local Plan, initially through the SHMA and its 2017 Update, as well as the Housing Needs Study [CD3.79]. The evidence is drawn together in the Housing Needs Assessment Topic Paper [[CD 3.73](#)], at pages 18-22, and developed into policy requirements through the Housing Supply and Trajectory Topic Paper. [[CD 3.74](#)]
24. Further explanation is provided in relation to Matter 8, Issue 6. [TWLP/032].
- c) Rural Worker Dwellings
25. There is no quantified assessed need for such accommodation, but planning applications are regularly made for rural workers' dwellings. The proposed policy reflects established policy and practice, covering matters including size and type of accommodation.
26. Further elaboration is provided in relation to Matter 8, Issue 7 [TWLP/033].
- d) Self-Build and Custom Housebuilding
27. The need for self-build and custom housebuilding is estimated, drawing on the Council's Register. This is contained on (paginated) pages 26-29 of the Housing Needs Assessment Topic Paper [[CD 3.73](#)], whilst the approach of the Council in meeting that need (which draws on a local survey of single dwelling schemes), is set out in the Housing Supply and Trajectory Topic Paper, at pages 46-49. [[CD 3.74](#)]
28. This is further elaborated in the Council's response to Matter 8, Issue 8 [TWLP/034].
- e) Gypsies and Travellers
29. The need for pitches is assessed in the Council's Gypsy and Traveller Accommodation Assessment (GTAA) [[CD 3.78](#)], and updated to cover the whole plan period in the Housing Needs Assessment Topic Paper [[CD 3.73](#)]. The Council's Housing Supply and Trajectory Topic Paper [[CD 3.74a](#)] provides, at (paginated) pages 50 – 56, a detailed explanation of the how the number of pitches to be delivered from 2017 to 2038 is calculated.
30. Further explanation is given in relation to Matter 8, Issue 11 [TWLP/040].

Conclusion

31. As summarised above and elaborated upon in relation to the respective subsequent issues under Matter 8, the Council has both duly assessed the housing needs for different groups in the community been and reflected these assessments in its planning policies, as required by paragraph 62 of the Framework.