

## **Matter 2 – Housing and Employment Needs (Policy STR1)**

### 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')?**

1.1 Paragraph 4.10 of the Submission Plan indicates that the standard method housing need figure for the borough is 678 dwellings per year; and that over the full plan period 2020 to 2038, this equates to a need of some 12,204 dwellings. It also acknowledges that national policy clarifies that this would be a minimum target; the uncapped local housing need being 765dpa.

1.2 Paragraph 3.3. of the Housing Land Supply and Trajectory Topic Paper (CD 3.74) indicates that this is based upon the standard methodology (2014 based household projections (published July 2016)), projected household growth in Tunbridge Wells for the period 2020-2030, whilst not explicit we also assume this factored in the most recent median affordability ratio, which at the time of submission was 1.58.

**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?**

2.1 Redrow and Persimmon do not consider there to be any exceptional circumstances warranting an alternative approach to the standard method.

**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?**

3.1 Paragraph 4.12 of the Submission Plan acknowledges that *'in addition to seeking to meet the borough's housing needs, the NPPF expects councils to also take into account any unmet housing needs from neighbouring areas.'* It goes on to advise that whilst adjoining councils are generally also seeking to meet their own housing needs, *'the position for Sevenoaks District Council is unclear. It was not proposing to wholly meet its housing need (with a shortfall of 1,900 dwellings), although this is likely to be further tested.'*

3.2 Paragraph 2.11 of the SoCG with SDC, (CD 3.151) provides an update on this situation, it states: *'Whilst the outcome of SDC's plan making process cannot be predetermined, SDC considers at this time that it highly unlikely that its housing needs can be accommodated on land that is unaffected by constraints listed in footnote 7 of the NPPF,*

*including the Green Belt. Given the stage reached by each authority in its plan making process, SDC's emerging evidence base, and the outcome of future DtC discussions, sufficient information is not yet available to determine any such shortfall. In accordance with paragraph 141 of the NPPF, SDC will examine all reasonable options to meet its strategic development needs, before concluding on whether exceptional circumstances exist to justify the release of Green Belt land. The provisions of other footnote 7 constraints (including AONBs) will also be considered in accordance with national planning guidance.'*

3.3 Paragraph 3.3. continues: *'Notwithstanding the conclusions of previous discussions, there may be scope for any excess housing "buffer" in TWBC (as referred to in para 2.18 below) to be considered as part of the wider delivery of housing in the West Kent Housing Market Area, and for this to be discussed under the duty to cooperate.'* Paragraph 2.18 explains that the TWLP provides for a buffer of approximately 1,050 houses above TWBC's local housing need. Paragraph 2.19 of the DTC statement goes on to state: *'The buffer has been planned for as it is considered that it is prudent to provide this degree of flexibility in the actual housing supply, particularly having regard to the high contributions from the strategic sites (Tudeley Village and Paddock Wood including land in east Capel). However, it may be that, in due course following Examination and adoption of the TWBC Local Plan and subsequent monitoring of housing delivery, there may be scope for any excess buffer to be considered as part of the wider delivery of housing in the Housing Market Area, and for this to be discussed under the DtC. This is, of course, dependent on the progression and adoption of the TWBC Local Plan'*

3.4 The DTC statement also explains that whilst TWBC formally asked that SDC's request for assistance in meeting the unmet need associated with their former plan, as set out in their email of 11th April 2019 be withdrawn: the email has not been withdrawn; albeit paragraph 2.09 of the SoCG states: *'Both TWBC and SDC consider that the request and the figure of 1,800 units in April 2019 can no longer be relied on'*<sup>1</sup>

3.5 This apparent impasse leads us to conclude that the potential unmet needs of SDC are still relevant and a material consideration with regard to the housing requirement in this local plan. Similarly, whilst TMBC have not asked TWBC to assist with their unmet need, their Local Plan is also in the early stages of preparation and the leader has made it clear that the implications of the standard methodology (requiring 839dpa (capped) to be delivered within the borough over the new plan period rather than the 696 dpa set out in the now withdrawn 2019 Local Plan), are grave. To this end we note that para 2.13 of the SoCG (CD3.132cii – electronic page 62) with TMBC advises that *'At this stage, and until the conclusion of the evidence base and assessment work, TMBC cannot say whether there is, or is not, unmet housing need.'* Which again suggests that the unmet needs of this part of the HMA are also a material consideration with regard to the housing requirement in this local plan.

3.6 Given the above, and whilst acknowledging the buffer provided for within the housing supply in the submission plan, we believe that there is just cause for the TWLP to look to accommodate potential unmet needs from neighbouring authorities who sit within the same HMA. As to what the figure should be the lack of clarity as to the level of unmet need makes

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<sup>1</sup> It is noteworthy that using the current Standard Method calculation for Sevenoaks that would apply to any new Local Plan the deficit has increased to at least 2,030 dwellings.

this difficult to quantify. It could however be circa 2,000 dwellings over the plan period. i.e. an additional 111dpa given the position SDC adopted historically/ the scale of the uplift TMBC are now looking to address. This however is not far removed from options 10 and 11 as assessed in the SA and which, as set out in our matter 1 issue 3 statement, we do not believe that the distribution strategy promoted in options 10 and 11, and the resultant scoring, necessarily represents the only reasonable alternative when looking to meet the uncapped need/ the uncapped need and unmet need. Indeed, proffering only 1 option each when considering these 2 alternatives, when there are 7 that look at the options for the capped need seems somewhat dismissive of the potential merits of meeting the uncapped need/ the uncapped need and unmet needs. Whilst the SA indicates that both would lead to further development across settlements, including in the AONB, we believe there are potential alternatives given the findings of the SHLAA that could accommodate this level of additional growth without harm to the AONB, and that the social and economic merits of a higher level of growth have not been properly acknowledged/ given the weight they deserve.

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

4.1 If the local plan is adopted in the monitoring year 2022/23 then the plan will, as the plan period is 2020-2038, have a plan period of 15 years. If however adoption slips beyond the monitoring year 2022/23, then the plan will have less than 15 years from the point of adoption, and will need amending accordingly.

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?**

5.1 No. Whilst the Development Strategy Topic Paper (CD3.64) in section 6, sub sections H and I, looks to address the issue of the exceptional circumstances justifying the release of Green Belt land/ land within the AONB, it's clear having regard to the SA and SHLAA that in order to meet the capped need, TWBC will need to look to release some Green Belt and/or the land within the High Weald AONB. It's also clear from the SA that failure to meet the housing needs will have social and economic implications for the borough, and that whilst the SA has not looked at how the council could accommodate the housing need without releasing land from the AONB, option 6 does look at meeting the needs without releasing land from the green belt and concludes at para 6.2.11 that: *The scoring outcome for Growth Strategy 6 (Meet need with no Green Belt loss) demonstrated*

*that, without Green Belt release, meeting the housing need causes highly negative impacts for travel and climate change and some social objectives are not as positive as they would be otherwise (housing, education, equality)*

5.2 Given the findings of the SA and the Development Strategy Topic Paper we believe the council have met the tests in paragraph 141 and 177 of the NPPF in relation to Green Belt and AONB that it needs to amend its Green Belt boundaries and/or develop in the AONB if it is to meet its housing needs in full.

5.3 Given the acute affordable housing needs of the borough, see issue 2 below, we would also suggest that there are exceptional circumstances here that justify releasing further land from the Green Belt/ AONB. As set out in our reps on the SA (Matter 1 issue 3), the findings of the SHLAA, and a review of the reasonable alternatives to development within the main settlements as reviewed in chapter 8 of the SA, it appears to us that the council could accommodate further growth above the capped need without any additional harm to Green Belt/ the AONB.

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

6.1 Yes. The SA of the Submission Plan (CD 3.130) clearly demonstrates at para 6.2.17 and table 26 that the housing requirement generated by the standard method in its capped form is deliverable and that Growth Strategy 13 as promoted in the Submission Plan is 'successful in maximising beneficial effects and minimising negative effects'. It is also clear from para 6.2.5 and table 26 of the SA that delivering less than that generated by the standard method in its capped form (options 1 (346 dpa) and 2 (560 dpa)), reduced the social and economic scores of the options under consideration and worsened the objectives of business, housing, employment, and deprivation, such that it was not sustainable and not pursued any further.

## 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?

1.1 There is some ambiguity on this point. The Housing Needs Assessment Topic Paper (CD3.73) summarises the findings of recent housing needs surveys; the 2015 SHMA (CD3.23) identified a need for 341 affordable homes per annum, the 2018 HNS (CD3.19) a need for 443dpa and the recent 'Review of Affordable Housing Needs in the Context of First Homes' (2021) (CD3.76) a need for around 323dpa. TWBC need to clarify the situation and when clarified it should be set out clearly within para 6.317 of the plan/ the preamble to policy H3.

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

No Comment

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?

3.1 Whether the need is 341, 443, or 323 affordable homes per annum, this is a considerable figure when assessed against the minimum Local Housing Need figure of 678dpa as defined by the standard method<sup>2</sup>. Furthermore, whilst policy H3 looks to deliver 40% affordable provision on all greenfield sites of 9 (+) dwellings, not all sites provide affordable housing, thus, in order to meet 100% of the affordable requirement the plan would need to deliver a minimum of 807dpa (assuming a requirement of 323dpa) up to circa 1,107dpa (assuming a requirement of 443dpa) over the plan period i.e. between 19% and 63% more than currently planned.

3.2 Given the above the affordability requirement will clearly not be met, a position exacerbated by the fact not all the proposed allocations look to provide 40% affordable housing. Some, such as Policies AL/RTW 3, AL/RTW 4, AL/RTW 6, AL/RTW 7, AL/RTW 10, AL/RTW 11, AL/RTW 12, AL/RTW 13, AL/RTW 14, AL/RTW 20, AL/SO 3, AL/CRS 6, AL/HA 2, AL/HA 3, AL/BE 3, AL/BE 4, AL/PE 5, AL/PE 6, and AL/RU 1 are 30%, AL/CRS 1 (a carried over LP allocation) is 35%, and Policy AL/BE 2 is 48%.

3.3 The affordability ratios published in March 2021, indicate that the ratio of lower quartile house price to lower quartile gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2020, had in Tunbridge Wells increased from 9.58 in 2010, to 10.51 in 2015 and 12.8 in 2020; the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2020 being 9.91 in 2010, 10.98 in 2015 and 13.27 in 2020. In addition the Housing Needs Assessment Topic Paper (CD 3.73) indicates at para 3.12 that: '*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*

<sup>2</sup> The uncapped figure of 765dpa would better be described as the actual housing need, the figure of 678dpa being capped at 40% so in effect the minimum Local Housing Need figure defined by the standard method.

*consistent over the last five years. It fluctuates between 870 and 970, with the average time to be housed increasing somewhat.'*

3.4 The affordability situation in Tunbridge Wells is thus worsening year on year. Given this situation, and having regard to the advice in PPG, the council should in our opinion have considered whether an increase in the total housing figures included in the plan was justified in this instance. Whilst the SA does test the effects of looking to meet the uncapped housing needs within growth strategies 10 and 11, we believe it should have looked at these more thoroughly before dismissing them given their perceived environmental impacts.

Issue 3 – Employment

No comment