

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

Matter 8: Meeting Housing Needs
Issue 3: Housing for Older People and
People with Disabilities

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Matter 8 – Meeting Housing Needs

Issue 3 – Housing for Older People and People with Disabilities

Inspector’s Question 1: [re. Modifications to Rectify Soundness Issues]

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?

TWBC response to Question 1

Introduction

1. Paragraphs 89-92 of the Inspector’s Initial Findings [[ID-012](#)] address the matter of housing for older people and people with disabilities.
2. Paragraph 89 sets out that paragraph 62 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Amongst others, this includes housing for older people and people with disabilities. It is noted that paragraph 62 of the NPPF has been renumbered in the December 2023 [NPPF update](#), and is now paragraph 63.
3. The Submission Local Plan [[CD 3.128](#)] and the recent proposed changes to this, subject to consultation between 15 January and 12 April this year, includes site allocations to meet the growth needs for older people and people with disabilities in accordance with para 62 (now 63) of the NPPF. This provision is explained further in the Council’s response to Questions 1 and 2 of this hearing statement.
4. Paragraphs 90 - 92 of the Inspector’s Initial Findings state:
 - “At the hearing sessions we agreed that the supporting text should not seek to define whether a development falls within Use Class C3 (dwelling houses) or Use Class C2 (provision of accommodation and care to people in need of care). This would be determined on a case-by-case basis having regard to the specific details of each

proposal". (para 90).

- “the supporting text at paragraphs 6.356 to 6.370 of the Plan then refers to the need for extra care housing and sets out how this will be met. A useful summary of the evidence supporting the Plan is provided in Examination Document TWLP_032a, which includes reference to the Housing Needs Assessment Topic Paper¹⁶” (para 91).
 - “As with other matters, the Final Report will consider in detail the evidence supporting the Plan and conclude whether or not its policies will be effective in meeting housing needs for older people. At this stage, for effectiveness, the Plan should be modified 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). For the same reasons the Plan should then make it clear how needs will be met by listing relevant sites, including any committed schemes”. (para 92).
5. The following response explains how the Plan can be modified to rectify the soundness issues identified, addressing paragraphs 90 and 92 of the Inspector’s initial findings, in particular.

Consideration

6. In response to paras 90 and 92, the Council has reviewed Submission Local Plan Policy H6 Housing for Older People and People with Disabilities, and has prepared a modified policy, attached at **Appendix 1** of this hearing statement. It is noted that this did not form part of the Council’s formal response to the Inspector’s Initial Findings letter received November 2022, and that as such it has not been consulted upon through the recent Tunbridge Wells Borough Council (TWBC) consultation on the response, conducted between 15 January and 12 April this year. The suggested modifications to this policy would therefore form part of the main modifications consultation to take place in due course. As identified in the Development Strategy Topic Paper Addendum [[PS 054](#)] at para 1.8 “*For clarity, this Addendum to the Development Strategy Topic Paper does not consider the full range of modifications that may be required to the Local Plan. Rather, it is focussed on those matters raised by the Inspector that he believes need reviewing at this point to enable the examination to proceed*”.
7. In response to para 90 of the initial findings, the supporting text to Policy H6 has been

modified so that it no longer seeks to define whether a development falls within Use Class C3 (dwellinghouses) or Use Class C2 (provision of accommodation and care to people in need of care). The modification sets out clearly that whether extra care housing falls under Use Class C2 or C3 will be determined on a case-by-case basis having regard to the specific details of each proposal. These modifications fully respond to and meet the requirements of para 90 of the Inspector's initial findings.

8. Similarly, in response to para 92, the supporting text has been modified to clearly set out the gross need for extra care housing based on the two methods used (KCC model and the 25/1000 (SHOP@)) in terms of the total number of units, and the total supply needed over the plan period. Furthermore, the modification also sets out need calculated on the basis of a 45/1000 prevalence rate based on a broader definition of housing with care, which gives the highest need figure of 593 units (of all three methods). For information, it is noted that the matter of prevalence rates and need figures was considered at the 'Land at Sandown Park, Royal Tunbridge Wells' public inquiry (appeal reference APP/M2270/W/21/3289034), which related to a development scheme that sought outline consent (under planning reference 20/01506) for the development of a care community within Use Class C2 of up to 108 units of accommodation for older persons in need of personal and nursing care; associated communal facilities and services to meet residents' day to day needs and associated facilities for staff; car parking for residents, visitors and staff of the community; associated landscaping and outdoor amenity areas; and associated infrastructure.' The appeal decision dated 2 September 2022 is attached at Appendix 3.
9. This third approach is consistent with the Council's position at the previous Local Plan Hearings (Stage 2) when it explained that in some circumstances (taking account of the nature of a proposed scheme) it may be appropriate to adopt a broader definition of Housing with Care, using this 45/1000 prevalence rate, where schemes provide for individuals with a range of different care needs or dependency levels. This brings together the needs identified for extra care and enhanced sheltered housing.
10. The appeal Sandown Park appeal Inspector, at para 80 concludes that a prevalence figure of 45/1000, as advanced by the Council, is not an inappropriate or unreasonable rate to use in these circumstances. This is therefore also shown in the policy table (for Policy H6) with the supporting text.
11. The Addendum to the Development Strategy Topic Paper, sets out more detail on the

45/1000 prevalence rate at para 13.9 and the two other methods for calculating need.

12. The modifications can be found at paras 6.349 to 6.370 of the redrafted Policy H6 at **Appendix 1**. The suggested amendments to the policy also make it clear how extra care needs will be met by listing the relevant sites, including any committed schemes (para 6.364). For clarity, this list is set out in Table 1 below:

Table 1: Sites for extra care to be listed in supporting text to modified Policy H6 Housing for Older People and People with Disabilities.

Site	Status	Extra Care Units
Arriva Bus Depot, Royal Tunbridge Wells	Has planning permission (reference 17/00731/FULL) (proposed site allocation AL/RTW 4) and work is well advanced on site.	89 units
St. Michaels, Burrswood, Groombridge, Royal Tunbridge Wells	Has planning permission by a Certificate of Lawful Development for conversion of a care home to assisted living apartments (reference 20/03643)	72 units
Former Cinema Site, Royal Tunbridge Wells	Has planning permission (reference 22/02304/FULL). Work has started on site (see Matter 2, Issue 1 for full update on this site) (proposed site allocation AL/RTW 1).	166 units
Woodsgate Corner, Pembury	Proposed site allocation AL/PE 6*.	80 units
Land at Cornford Court, Cornford Lane, Pembury	Currently proposed for allocation by Policy AL/PE 7**	69 units
Paddock Wood – Strategic allocation (including East Parcel)	Proposed site allocation STR/SS 1***	C125 units
Paddock Wood –East Parcel	Planning application (reference 23/00086/HYBRID) pending consideration (70 bed care home or 60 extra care units)	60-70 units (form part of the above c125 units)
Total		C601 units

*This policy (Woodsgate Corner) also allows for an alternative residential care scheme of up to 120 units.

** This site, Cornford Court, has an extant consent (reference 17/01151) for a 68-bed integrated community health centre (C2 use class) and associated parking. Most recently, on 15 May 2024, the Council's planning committee resolved to grant planning consent subject to a S106 agreement, for an alternative scheme. The alternative scheme ([reference 23/03419/Full](#)) is for Demolition of an existing single storey structure (currently used as staff accommodation) and erection of a part two/part three storey Assisted Living unit (use C2) comprising of 69 two-bedroom suites along with a Gym, Community Room and Hydrotherapy Pool along with associated car parking, landscaping and alterations to site levels. This recent scheme is wholly for extra care provision. Whilst the planning decision notice has yet to be issued, upon completion of the Section 106 agreement, the Council considers it is fair to include this in the table of supply. It is noted that para 2.02 of the [planning committee report](#) identifies that *"the facility now proposed will provide more independent living accommodation for older residents"*.

Main Modifications to the site allocation policy (AL/PE 7) would be needed to set out clearly the proposed extra care provision on the site. Suggested modified text is provided at **Appendix 2** of this statement.

*** This policy (Paddock Wood and land at East Capel) also allows for a mix of housing in accordance with policy H1, to include sheltered accommodation provision in accordance with policy H6 as required by Part 4 of the proposed modifications to STR/SS1.

13. It is noted that proposed modifications to Policy H6, relate to supporting text only, to address the initial findings of the Inspector.

Supply

14. Table 1 shows that the supply identified is clearly sufficient to meet, and indeed exceed, the extra care housing need against both methods - the KCC model and SHOP@ models, using the narrow definition of the extra care need (as shown in the table on page 58 at para 3.10 of the Development Strategy Topic Paper Addendum).
15. Need based on the higher prevalence rate of 45/1000, is some 593 units net over the plan period and the supply table above (table 1) shows this higher need can also be met and is also exceeded- demonstrating a supply figure of some 601 units.
16. Of the six sites listed in Table 1 above, four of these already benefit from either having received planning permission or have a resolution to grant planning consent – together these total some 396 units. Of the remaining two sites, the agent acting on behalf of Tesco in relation to the Woodsgate Corner site at Pembury (AL/PE 6) has confirmed by email dated 13 May 2024 (attached at **Appendix 4**), that the intention is that the site will be developed for uses including extra care, subject to market demand. It is reasonable therefore also to count this as contributing towards the extra care housing supply.

17. This leaves only the strategic site at Paddock Wood and Land at East Capel.
18. It is noted that the strategic policy for Land at Paddock Wood, including East Capel, as drafted/modified at appendix D in the Development Strategy Topic Paper Addendum [\[PS_054\]](#), on page 79 sets out requirements for the south east (eastern) parcel, which at criterion ii requires, the inclusion of specialist extra care accommodation for the elderly in accordance with policy H6.
19. The policy requirements (criterion ii) for the western parcel of the allocation also seeks provision in accordance with Policy H6, and furthermore, the development principles for the strategic allocation, at development principle 4 set out the expectation – *“Make provision for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including the needs of older people with at least one sheltered and one extra care housing scheme to the east and west”*.
20. The Development Strategy Topic Paper Addendum [\[PS_054\]](#), at para 13.11 on page 58, sets out the supply of extra care provision, which includes the Paddock Wood strategic allocation (including the East parcel), and seeks some 125 units of which around 60-70 units would be delivered on the east parcel.
21. Relating to this eastern parcel, the Council is currently considering a planning application (planning reference [23/00086/HYBRID](#)) for: Full Application for erection of 160 homes. Outline Application (appearance, landscaping, layout and scale reserved) for the erection of up to 400 additional homes, inclusive of associated infrastructure including land for specialist accommodation for the elderly, land for secondary school expansion, a local centre, play areas, network of new roads (and widening of existing roads), surface water drainage features, car and cycle parking and open space and associated works. It includes proposals to enable delivery of either a **70 bed care home or 60 extra care units** (to be confirmed at reserved matters stage). If in due course the parcel comes forward with the 70 bed care home, rather than 60 units of extra care, this potentially, would mean a shortfall of some 52 extra care units (need – supply).
22. The residual (65 units) of the 125 units included in the strategic allocation, is expected to be sought on the south western parcel – as set out at criterion ii of the south western parcel requirements (see page 77 of the Development Strategy Topic Paper Addendum).
23. If the Inspector is concerned about the delivery of extra care housing, the Council would be

amenable to further modifications to Policy STR/SS 1 to specify the numbers of units expected to be delivered.

24. The potential supply shortfall of some 52 units is based on the higher needs model, the 45/1,000 prevalence rate, (should provision at the Paddock Wood Eastern parcel be delivered for a care home) and equates to less than 2 years' worth of need, which the Council considers can be addressed through the Local Plan review or through delivery of a windfall scheme(s) during the plan period. Given the scale of such schemes it is likely that only one windfall scheme would be required to meet this shortfall.

25. Historically, the Council has had a good short-medium term windfall supply of extra care units. This has previously been recognised and accepted at the 'Land at Sandown Park, Royal Tunbridge Wells' public inquiry (appeal decision at **Appendix 3**). Examples of delivery of recent extra care schemes on windfall or C3 residential allocations in the Borough include:

- The Dairy, 103 St Johns Road – this extra care development of 49 units was brought forward on a site allocated for residential development for approximately 31 dwellings (AL/RTW18 in the Site Allocations DPD) and which previously had an extant consent for 58 apartments. It was a former Dairy Crest depot. It was completed in 2017.
- Hale Court – this scheme came forward through redevelopment of an existing building owned by Abbeyfield. It thus represented windfall development, delivering 19 extra care units. It was completed in 2016.
- Bowles Lodge, Hawkhurst – this scheme involved the demolition of an existing nursing home and redevelopment to provide an extra care scheme comprising 48 flats. It was completed in 2017.

26. The appeal Inspector for the Land at Sandown Park Public Inquiry, at paragraph 94 of the appeal decision dated 2 September 2022, concluded that "*It is entirely possible that windfall sites may come forward and such sites have contributed towards supply in the recent past*", and noting further on that "*windfalls will have a part to play in contributing to supply*". The potential for windfalls provides flexibility and supports confidence in the ability to meet extra care housing needs.

27. The Council will monitor delivery over time. The Council would also note that there is the possibility that further specific allocations could be made through the emerging [Royal](#)

[Tunbridge Wells Town Centre Local Plan](#) which is currently at an early stage of production. It is being produced in accordance with Policy STR/RTW 2 (page 81) of the [Submission Local Plan](#). The Royal Tunbridge Wells Local Plan has recently undertaken a first stage Issues and Options style, Regulation 18 public consultation, alongside a second call for sites.

28. As such the Council is confident in the identified supply and the ability to fully meet the need for extra care housing over the plan period.
29. In addition to permissions for extra care housing, the Council has continued to see applications for other forms of specialist housing for older people and those with disabilities come forward. Such sites have come forward on both allocated sites and through windfall development. Examples include:
- Beechwood Sacred Heart School, Tunbridge Wells (16/07697/FULL): consent for 69-bed care home;
 - Owlsnest Wood, Pembury (19/01600/FULL): consent for 76-bed care home;
 - Former Plant & Tool Hire Site, Tunbridge Wells (21/0328/FULL): consent for 42 retirement apartments.
 - Site at 24-38 Commercial Road, Paddock Wood (18/03262/FULL): consent for 34 retirement flats (net 23).

Conclusion

30. This response to Question 1 demonstrates that the Council's proposed modifications to the supporting text for Policy H6 Housing for Older People and People with disabilities, will address soundness issues identified at paras 89-92 of the Inspector's Initial Findings.
31. In particular, modified text is proposed (provided at Appendix 1) so that it no longer seeks to define whether a development falls within Use Class C3 (dwellinghouses) or Use Class C2 (provision of accommodation and care to people in need of care), and that this will be determined on a case-by-case basis having regard to the specific details of each proposal. Furthermore, in response to para 92 the supporting text has been modified to clearly set out the gross need for extra care housing based on the two methods used (KCC model and the 25/1000 (SHOP@)). It also sets out need calculated on the basis of a 45/1,000 prevalence rate, which results in a higher need figure. In addition, proposed modification to the

supporting text, now clearly list the sites identified to provide for extra care housing, which demonstrates that extra care need can be met, including for the higher need figure.

Inspector's Question 2: [re. Implications of Changes to the Plan]

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?

TWBC response to Question 2

Introduction

32. In considering the Inspector's initial findings as a whole, and in particular the consequential changes needed to the Plan resulting from the proposed deletion of the Tudeley Village strategic allocation (Policy STR/SS 3) from the Plan, and with reduced growth proposed at Paddock Wood and Land at East Capel (strategic allocation Policy STR/SS 1), the Council has fully considered how the needs for older people and people with disabilities will be met. This relates to para 93 of the Inspector's Initial Findings, which states:

"Conclusions reached above in relation to Tudeley Village and Paddock Wood will no doubt have consequential impacts on how the needs for older people and people with disabilities will be met (both strategic sites include requirements to provide sheltered and extra care housing). In the first instance this will be a matter for the Council to consider in suggesting ways that the Plan could be made sound".

Consideration

33. As set out in the Council's response to Question 1, the Council's suggested changes to the Plan would continue to fully meet the extra care needs identified against both the KCC and SHOP@ models. It is also shown that using the wider definition of a housing with care need (based on a 45 per 1000 prevalence rate), which gives the highest care need figure, that need is also likely to be met.

34. Section 13.0 of the Development Strategy Topic Paper Addendum [[PS 054](#)], one of the recent consultation documents which sets out the Council's response to the Inspector's Initial Findings, addresses the updated housing land supply. Paras 13.7 – 13.13 (pages 57-59) relate to housing for older people and people with disabilities.

35. Should sites where there is the potential for either extra care or a care home to be delivered be brought forward for a care home, the potential shortfall (of some 52 units) equates to less than 2 years' worth of need, which the Council considers is likely to be addressed

through future windfall scheme(s), or if necessary, through the Local Plan review. Given the scale of such schemes it is likely that only one windfall scheme would be required to meet this shortfall.

36. As per the Council's response to Question 1, historically, the Council has had a good short-medium term windfall supply of extra care units. This has previously been recognised and accepted at the 'Land at Sandown Park, Royal Tunbridge Wells' public inquiry (appeal decision at **Appendix 3**).
37. The appeal Inspector, at paragraph 94 of the appeal decision dated 2 September 2022, concluded that "It is entirely possible that windfall sites may come forward and such sites have contributed towards supply in the recent past", and noting further on that "windfalls will have a part to play in contributing to supply".
38. Furthermore, should the Council be required to find an additional site allocation to meet this small unmet need, as per the Council's response to Question 1, there is the possibility that this could be addressed through the emerging [Royal Tunbridge Wells Town Centre Plan](#).

Conclusion

39. The Council's response to Question 2 explains the consequential changes needed to the Plan resulting from the proposed deletion of the Tudeley Village strategic allocation (Policy STR/SS 3) from the Plan, and with reduced growth proposed at Paddock Wood and Land at East Capel (strategic allocation Policy STR/SS 1), and that this has been fully considered.
40. It identifies that extra care need can still be met over the plan period, as explained within the response to Question 1.
41. Policy H6 supports a wider range of specialist housing provision, including retirement housing and care homes. The evidence shows that such housing has and is likely to continue to come forward on both allocated sites and through windfall development within the Borough, which the Policy supports.

Inspector's Question 3: [re. Modifications to make Plan Sound]

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

TWBC response to Question 3

Introduction and Consideration

42. Through its responses to Questions 1 and 2 set out previously, the Council is confident that the needs will be met and as such, that the Plan is sound. The Council is confident with the identified supply, and the prospect of future windfall sites coming forward over the plan period, which would meet needs against all three needs modelling approaches considered.
43. Furthermore, the Council can seek to allocate additional suitable sites as part of the emerging Royal Tunbridge Wells Town Centre Plan. The Town Centre is clearly a sustainable location for specialist housing.
44. In the event however, that ongoing monitoring of delivery indicates that needs are not being met or sites not progressing as currently anticipated, the Council would seek to plan for unmet need through the Local Plan review, which is proposed as a modification to the Submission Local Plan Policy STR1 The Development Strategy. In undertaking a Local Plan review, the Council would not only re-consider the evidence base needed to support the review but would also carry out a fresh Call for Sites and would seek to be pro-active in identifying sites that could be suitable for this use. The Local Plan review is dealt with by Matter 1, Issue 3.

Conclusion

45. As explained in the Council's responses to Questions 2 and 3 above, the Council is confident with the identified supply, and the flexibility provided by the prospect of future windfall sites coming forward over the plan period to meet the identified needs for specialist housing. Furthermore, the Council can seek and will be pro-active in seeking sites for specialist housing through the proposed Local Plan review (dealt with by Matter 1, Issue 3) or the emerging Royal Tunbridge Wells Town Centre Plan.

Appendices

Appendix 1: Policy H6 Housing for Older People and People with Disabilities – Proposed Main Modifications

Delete current Policy H6 and replace with the following:

Housing for Older People and People with Disabilities

6.349 The NPPF seeks to ensure that the housing needs of different groups, including older people and people with disabilities, are met by policies in local plans. The Planning Practice Guidance (PPG) reinforces this. It identifies providing housing for older people as critical and looks for local plans (and decisions) to 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.*"

6.350 For the purposes of this Local Plan, and in line with the NPPF, 'older people' are defined as people over or approaching retirement age. However, this is not prescriptive. Regard is also had to the needs of all people, including younger people with disabilities.

Different types of older persons' housing.

6.351 As well as providing appropriate support, in terms of planning functions, for people to continue to live in their own homes, the Local Plan includes this policy in relation to specialist housing for older people to include the following types of accommodation:

Age-restricted general market 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.

Retirement living or sheltered accommodation is defined as self-contained accommodation, often designed as a block of apartments, and managed for older people who require very little support. These schemes would normally provide additional facilities, such as a shared communal lounge, a warden, or a personal alarm system.

Extra care accommodation or housing with care is self-contained, with associated facilities, providing 24-hour access to care and emergency support, as well as on-site facilities such as a residents' lounge, laundry room, and meal provision facilities. In some cases, larger developments may be termed retirement communities or villages. These would normally provide a range of services, with provision 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.

Residential Care Homes and Nursing Homes provide non-self-contained residential accommodation. Rooms can be shared, or private, and an en-suite bathroom may be provided. Communal dining facilities and a communal lounge are provided, and meals and personal/nursing services are also provided to all residents as part of their tenancy. Residential nursing care accommodation includes end of life, hospice care, and dementia care home accommodation.

6.352 The PPG states that it is for the local planning authority to consider whether a particular development may fall within Use Class C2 (provision of accommodation and care to people in need of care) or C3 (dwelling houses). Residential Care Homes and Nursing Homes, End of Life, Hospice Care, and Dementia Care Home Accommodation fall within Class C2. Whether Extra Care housing falls under Class C2 or C3 will be determined on a case-by-case basis having regard to the specific details of each proposal, including the type and level of care provision and the services to be provided to occupants of the proposed development.

Need and demand

6.353 To inform the consideration of future needs for specialist housing, regard has been given both to national guidance and more local guidance from Kent County Council. As there is no agreed single methodology, a number of different forecasting approaches have been used.

6.354 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 old for extra care is 25 or 2.5%. This relates to people who need access to 24/7 support in line with the definition set out above.

- 6.355** Based on 2018 (ONS) population projections of the number of people over 75 years of age by the end of plan period, this would equate to a gross need of some 431 extra care units in the borough by 2038, an increase of some 248 units above the stock (of 183 units) in 2020, at the start of the plan period.
- 6.356** Forecasts from Kent County Council for extra care housing, based on its own more localised methodology, indicate a gross need for extra care housing of some 342 units in 2038. Deducting the stock of 183 existing units in 2020 generates a net increase of 159 units over the plan period (2020-38).
- 6.357** In addition to the above estimates, regard is given to a broader, market view of the scope of extra care housing, which can include “enhanced sheltered accommodation” which seeks to provide care to residents with a range of different care requirements. This adopts a prevalence rate in calculating needs of 45 per 1,000 people aged 75+. At this rate, the gross need for extra care accommodation in 2038 would be some 776 units based on the 2018 based ONS population projections. Deducting the current stock in 2020 generates a net need for 593 extra care units over the plan period.
- 6.358** The table below shows both the gross need for extra care (EC) housing during the plan period and the additional supply needed over the plan period taking account of the current (2020) provision 183 units.

Prevalence rate	Gross EC need to 2038	Net EC need to 2038
KCC model	342	159
25/1000 (SHOP@)	431	248
45/1000	776	593

- 6.359** In terms of residential/nursing care home provision, Kent County Council advises that Tunbridge Wells borough 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 for places to support dementia care. The Council is also supportive of proposals for other types of retirement housing, such as retirement living or sheltered accommodation, which can help to broaden the choice of good quality homes for older people, provided proposals are consistent with other relevant policies in the Plan.

Future provision

- 6.360** It is evident that there needs to be a balance of accessible homes and a range of specialist housing to help meet the housing needs of older people and those with disabilities.
- 6.361** To support living at home as long as possible, Policy H 6 introduces a requirement for all homes to be built to be adaptable and accessible for the majority of people. This is the technical standard in the Building Regulations for M4(2) housing. In addition, given that there is a relatively low supply of bungalows in the borough even though there is an evident need, further provision of bungalows is sought on most medium/larger sites as part of an increased supply of smaller dwellings, as set out in Policy H6 below.
- 6.362** Furthermore, provision is made for some homes built as suitable for use by people with physical disabilities. These homes will be built, to the higher M4(3) standards and are sought as part of the affordable housing requirements for developments of 20 dwellings or more. The higher M4(3) standards are only required on the affordable housing elements of schemes, as it is considered appropriate to require dwellings to be accessible for people with disabilities where there is some control over occupation. Only in circumstances where it can be robustly demonstrated by the applicant that this is not practicable or financially viable to deliver the above provisions will the new development be exempt from either or both of these policy requirements.
- 6.363** These needs will be addressed through a combination of site allocation policies, as listed below, extant planning permissions on suitable sites and windfall development.
- 6.364** Sites with outstanding planning permission and specific site allocation policies with potential to deliver extra care housing are:

Site	Status	Units
Arriva Bus Depot, RTW	Planning permission; (Allocation AL/RTW 4)	89 units
St Michaels Burrswood, RTW	Planning permission (pp)	72 units
Former Cinema site, RTW	Planning permission: ((Allocation AL/RTW 1)	166 units
Woodsgate Corner, Pembury	Allocation (AL/PE 6)	80 units
Land at Cornford Court, Cornford Lane, Pembury	Allocation Policy AL/PE 7	69 units
Paddock Wood –Strategic allocation (including East Parcel)*	Allocation STR/SS 1	C125 units
Total		C601 units

* Paddock Wood East Parcel planning application [23/00086/HYBRID](#) - 60-70 units (form part of the above c125 units)

- 6.365** It can be seen that the identified supply would meet the estimated need for extra care units using both the KCC and SHOP@ forecasting approaches, and the higher need of 593 units using a higher 45/1,000 prevalence rate. The Policy approach also provides flexibility, with the potential for windfall sites to support delivery of specialist housing including extra care schemes.
- 6.366** Other allocations in Section 5 that provide opportunities for specialised housing for older people and care homes include:
- AL/RTW 9: Land at Beechwood Sacred Heart School, 12 Pembury Road, Royal Tunbridge Wells (69 bed care home);
 - AL/HA 1: Land at The White House, Highgate Hill, Hawkhurst (43 retirement living apartments)
 - AL/PE 8: Owlsnest, Tonbridge Road, Pembury (76-bed care home).
 - AL/RTW 11: Former Plant & Tool Hire Site, Eridge Road, Tunbridge Wells: consent for 42 retirement apartments.
- 6.367** Housing suitable for older people's needs, although not necessarily age-restricted, can make a valuable contribution to housing provision, particularly in areas close to town centres, with local facilities and/or well served by public transport. Indeed, a town centre “windfall” site at 24-38 Commercial Road, Paddock Wood has been granted planning permission (December 2020) for 34 retirement flats (net 23). Generally, suitable provision may also include schemes for one or two bed flats/houses/bungalows, with a small garden. Provision of homes for older people can also free up existing family sized homes for people looking to make the next step up on the property ladder.
- 6.368** Schemes for new sheltered, extra care, residential/nursing care homes will be generally suitable on sites allocated for residential development in the Plan, as well as other locations, including by the extension of existing sites, where they are in line with other Plan policies, particularly if in accessible locations.
- 6.369** The Council is aware that accommodation suitable for people with dementia will be increasingly required, and delivery of this type of accommodation will be supported in principle, subject to other relevant policies of the Local Plan being met.

6.370 Given the correlation between an ageing population and an 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 built to the optional technical standards will also help address the needs of younger residents living with disabilities who may need a lower level of care.

Policy H 6

Housing for Older People and People with Disabilities

Development proposals should have regard to meeting the housing needs of older people and people with disabilities in a manner proportionate to the scale of the proposal.

This includes:

1. Adaptations and alterations, including conversions and extensions, to enable people to live in their home, which will be supported where these meet the requirements of Policy H 11: Residential Extensions, Alterations, Outbuildings and Annexes;
2. All new build housing development will be expected to meet the optional technical standard M4(2) for accessible and adaptable dwellings, as set out in the Building Regulations, unless demonstrably unviable;
3. Housing developments of 20 or more homes should include an element of bungalows (unless clearly inappropriate for site-specific reasons), as well as other one or two bed flats/houses as part of housing mix in accordance with Policy H1;
4. On new build housing developments of 20 or more homes, at least five percent of the affordable housing element will be expected to meet the optional technical standard M4(3) for wheelchair accessible dwellings, unless impracticable or unviable due to site-specific factors, where a need has been identified in the parish or ward (by the Housing Authority);
5. In addition to sites specifically allocated for specialist housing, such schemes will be supported on sites identified for residential development and other suitable sites, including extensions to existing schemes, particularly in accessible locations, subject to other policies of the Local Plan being satisfied.

Amenity space and parking provision

Housing for older people should incorporate amenity or garden space appropriate to the nature of the scheme. Housing schemes for older people will not be required to make contributions to provide for children's play space. Sheltered housing schemes (including Extra Care or equivalent) that make an appropriate contribution to communal amenity space are not required to make provision for open space for youth or adult use.

On-site parking will be required, for both residents and visitors, and should not diminish the

character of the street scene. Where appropriate, pick up and drop off facilities for taxis (with suitable kerbs), minibuses, and ambulances will be required, as well as suitable on-site storage and charging facilities for mobility scooters.

Affordable housing

Affordable housing should be provided in accordance with the general affordable housing policy, Policy H3: Affordable Housing.

Appendix 2: Policy AL/PE 7 Land at Cornford Court, Cornford Lane - Proposed Main Modifications

Land at Cornford Court, Cornford Lane

- 5.721** The site measures 1.13 hectares gross and is located immediately south of the settlement edge of Pembury, within the High Weald National Landscape AONB, and to the north of the A21, a trunk road managed by National Highways ~~Highways England~~. The site forms part of the Pembury/Capel Forested Plateau Landscape Character Area.
- 5.722** The site was released from the Green Belt, and the Development Strategy Topic Paper and Green Belt studies set out the exceptional circumstances and compensatory improvements to the remaining Green Belt to justify the changes to the boundary in this location.
- 5.723** Along the northern boundary of the site there is a rough access track that backs onto residential dwellings of Cornford Park located to the north. There is a TPO protecting trees in the north-west corner of the site. The site currently includes Cornford Court, which forms part of a larger site with Cornford House. Cornford House is a two/three storey existing care home and lies immediately south west of the site. The site is accessed from Cornford Lane, which serves both Cornford House and the existing Cornford Court.
- 5.724** To the north of the site there are residential properties. To the west, on the other side of Cornford Lane, is the rear of the Tesco site and associated land, part of which is the subject of Local Plan site allocation Policy AL/PE 6 Woodsgate Corner, Pembury.
- 5.725** This site benefits from an existing planning consent granted under reference 17/01151 in September 2018 for the demolition of the existing building and erection of a 68-suite integrated community health centre (C2 Use Class) and associated parking, which includes an integrated community daycare centre ~~-, serving a maximum of 20 people at any one time. The consented scheme is a dedicated diagnostic and treatment facility providing medical, nursing, and therapy support. It provides rehabilitation for the elderly, including those subject to hospital discharge.~~

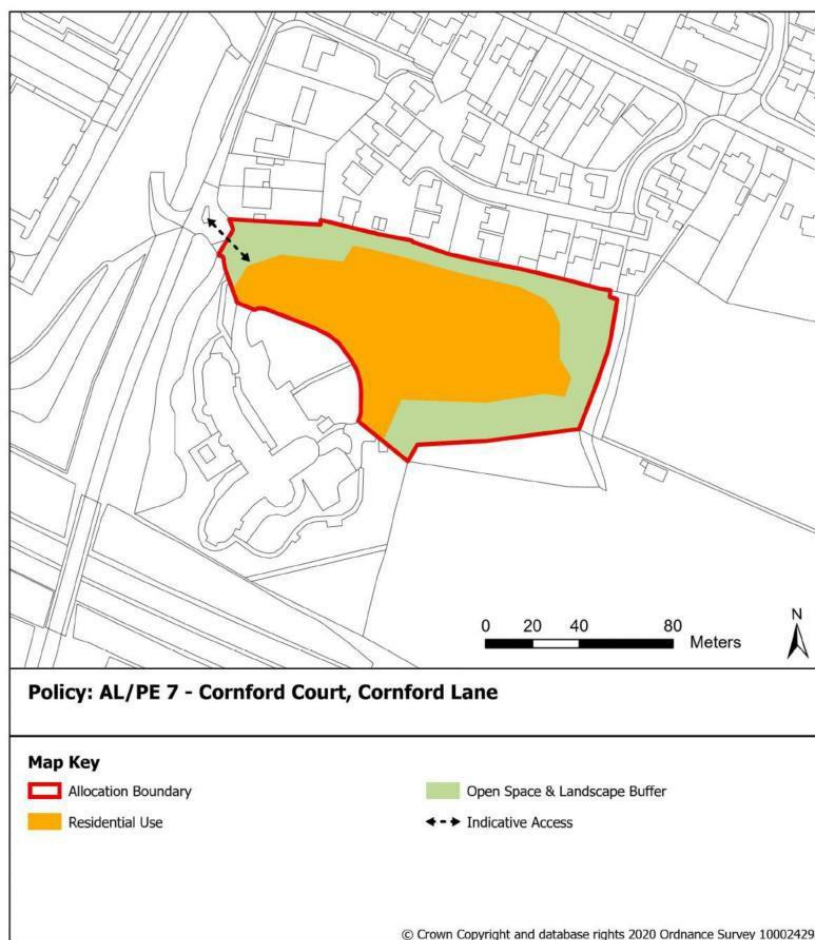
5.726 The integrated community daycare centre would be facilitated by a local support group such as the Alheimers Society. The existing consent includes a financial contribution towards a corridor study along the Pembury Road corridor, with a view to relieving congestion.

In addition, the site also benefits from a recent (In May 2024) Planning Committee resolution to approve planning consent (planning reference 23/03419/Full), subject to completion of a Section 106 legal agreement for demolition of an existing single storey structure (currently used as staff accommodation) and erection of a part two/part three storey Assisted Living unit (use C2) comprising of 69 two-bedroom suites along with a Gym, Community Room and Hydrotherapy Pool along with associated car parking, landscaping and alterations to site levels. This recent scheme is wholly for extra care provision. This site allocation policy has been modified to reflect this extra care resolution.

5.727 It is noted that accommodation falling within Use Class C2 does not count as fully equivalent to dwellings for housing supply purposes. For the housing supply and trajectory, the capacity of this allocation is to be counted as net 365-units, to include discounting for C2.

5.728 This Local Plan allocation seeks to carry forward this existing consent, which has not commenced development.

Map 70 Site Layout Plan



Policy AL/PE 7

Land at Cornford Court, Cornford Lane

This site, as defined on the Pembury Policies Map, is allocated for a ~~698-suite integrated community healthcare facility, including the provision of an integrated Community Day Care Centre-~~ suite extra care assisted living unit (Use Class C2)

Development on the site shall accord with the following requirements:

1. A transport assessment shall be submitted with the planning application and proposals shall be supported by a robust and thorough assessment as to the impact of the proposal on transport and the highway network, and the proposals shall deliver any mitigation measures identified through robust assessment as being required;
2. The layout and design of the scheme shall give full consideration to the site's edge-of-village location, providing a suitable and sensitive urban edge to the settlement, informed by a landscape and visual impact assessment, that takes full account of the AONB location;
3. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/PE 1, including contributions to be used towards

improvements to active travel infrastructure and measures, including bus journey times along the A264 Pembury Road.

In addition to the criteria in the above Policy, the relevant Policies that should be referred to in the Local Plan include: Policies EN 1: Sustainable Design; EN 12: Trees, Woodland, Hedges, and Development; EN 18: Rural Landscape; EN 19: The High Weald National Landscape ~~Area of Outstanding Natural Beauty~~; EN 27: Noise; H 6: Housing for Older People and People with Disabilities; TP 1: Transport Assessments, Travel Plans and Mitigation; TP 2: Transport Design and Accessibility; and TP 3: Parking Standards.

Appendix 3: Land at Sandown Park, Royal Tunbridge Wells - Appeal Decision

Please see separate document TWLP_133 Appendix 3_Land at Sandown Park - Appeal
Decision

Appendix 4: Woodsgate Corner site at Pembury (AL/PE 6) - Email

From: [Jessica Ferguson](#)
To: [Ellen Gilbert](#)
Subject: Tunbridge Wells Local Plan - Woodsgate Corner
Date: 13 May 2024 14:07:05
Attachments: [image001.jpg](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ellen,

It was good to speak with you last week. I have spoken with my client who has confirmed that the intention is to develop the site for uses including extra care, subject to market demand.

Kind regards,
Jessica

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