

Representor number
PSLP_2048 to PSLP_2052

EXAMINATION OF THE TUNBRIDGE WELLS BOROUGH LOCAL PLAN

INSPECTOR'S MATTERS, ISSUES AND QUESTIONS FOR STAGE 3

MATTER 8 – OLDER PERSONS HOUSING

Prepared by Pro Vision on behalf of Cooper Estates Strategic Land Limited

May 2024

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TUNBRIDGE WELLS LOCAL PLAN

STAGE 3 HEARING STATEMENT - MATTER 8
PROJECT NO. 2133

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DATE:

MAY 2024

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1.0 Introduction

- 1.1 As the Inspector will be aware through correspondence¹ on behalf of Cooper Estates Strategic Lane (“CESL”) Limited, Pro Vision has long been concerned that plan making by Tunbridge Wells Borough Council (“TWBC”, “the LPA” or “the Council”) has failed to robustly identify needs, and then plan positively to meet those needs in full.
- 1.2 Despite having now identified a need for older persons housing, the Modified Local Plan at this Stage 3 Examination continues to plan for a shortfall against that need. This is not positive planning and in our view this plan should not continue through the Examination process.
- 1.3 In particular, CESL remain concerned that there is a critical need for Older Persons housing, and this Council still fails to allocate sufficient sites to ensure the need is met in full. This is despite there being a suitable and available site as promoted by CESL adjoining the settlement boundary of Royal Tunbridge Wells at Sandown Park² for a development which would assist the Council in ensuring that the identified need for specialist housing for older persons³ is met.
- 1.4 This Matter Statement focuses on whether the accommodation needs for older persons has been met through the modifications proposed.

¹ Representation [PSLP_2048](#), full document at [SI_140](#)

² Regulation 22 version of the SHELAA (Jan 2021) – [Core Document 3.77n - Site 114](#)

³ Specifically “Extra Care accommodation” as a category of specialist housing for older people, as defined by the [Planning Practice Guide at Paragraph: 010 Reference ID: 63-010-20190626](#)

2.0 Stage 3 - Matter 8: 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?

- 2.1 In Paragraph 92, the Inspector stated that the plan should be modified to “*clearly set out the gross need for extra care housing based on the two methods used*” in the Housing Needs Assessment Topic Paper (CD3.73). These two methods are the KCC localised methodology, which produces a gross need for Extra Care to 2038 of 342 and the SHOP@ model, which produces a gross need for Extra Care to 2038 of 431.
- 2.2 Paragraph 62 of the Framework requires the housing needs of differing groups to be “assessed”, including the needs of older people. Whilst the PPG refers to use of the SHOP@ online toolkit, Housing LIN (Later In Life) advise this model has been adapted over the last few years so that the approach refines the previous use of national generic ‘benchmarks’ to better estimate future need for specialised housing and accommodation for older people at a local authority level. The section of the PPG which refers to the SHOP@ toolkit dates from 2019 so is likely to be the generic ‘benchmark’, and not the refined approach now preferred by Housing LIN.
- 2.3 As such, Housing LIN now advise authorities to commission an assessment for the Borough, rather than default to the 25/1000 prevalence rate from the online toolkit. This Council has not commissioned an assessment by Housing LIN and therefore, use of SHOP@ should be discounted in our view given the evidence elsewhere (i.e. the SHMA) that the Borough has an aging population, and the population aged 65+ years is expected to increase by 40.7% from 22,600 in 2017 to 31,800 in 2033⁴.
- 2.4 The KCC Localised Methodology referred to comes from the KCC Market Position Statement which covers the period 2021-2026. The figure of 431 has been determined by rolling forward the need figure for the Borough derived from that report. Again therefore, it is not a detailed or specific assessment of the need of older persons in the Borough but an estimate.

⁴ See Para 3.30 of the Housing Needs Assessment Topic Paper February 2021.

- 2.5 Nevertheless, in response to the Inspectors initial findings, the Council has taken forward the prevalence rate of 45 per 1,000 people aged 75+ to produce the gross need for Extra Care in 2038 of 776 units. Whilst also not a specific assessment of need, we note that this prevalence rate is consistent with that widely used by care providers and planning authorities in determining planning applications, and by the Secretary of State in determining planning appeals for Extra Care housing.
- 2.6 In our earlier representations, we noted that the Council had also used the prevalence rate of 45/1000 in determining the application for Extra Care Housing at the RTW Cinema Site⁵. Given that the Council accepts use of the prevalence rate for extra care units of 45/1000 in assessing planning applications, it is considered that the need figure derived from this prevalence rate is that which should be taken forward into the Submission Local Plan.
- 2.7 As such, we consider that the supporting text to Policy H6 should be amended by deleting all references to both the KCC model, and the SHOP@ model, for clarity, and the Policy should instead make clear the Council's intention to:
- “plan for a minimum of 776 extra care units over the plan-period 2020 – 2038”.*
- 2.8 We note that the existing supply is agreed at 183 units, which as noted in the Council's Topic Paper leaves a net need for 593 extra care units to be met through the Local Plan to 2038.
- 2.9 Turning then to supply, the Council at Paragraph 13.11 of the Topic Paper list sites with extant planning permission and propose specific site allocations purportedly to meet the need for extra care housing. We provided detailed commentary on these sites in our representations and direct the Inspector to Section 4 of those representations.
- 2.10 The Council's list of sites would, if all delivered for extra care housing, result in a supply of 532 extra care units against a need of 593, therefore leaving a shortfall of 61 units. The Council suggest this shortfall can be met through windfall, however, our representations highlighted that the actual shortfall is likely to be far greater if any one or all of the following occurs:
- St Michaels Burrswood remains as a Care Home removing 72 units from the supply.
 - The proposed Woodsgate Corner allocation is delivered as a Care Home removing 80 units from the supply.

^{5 5} Application Reference: 22/02304/FULL Paragraph 10.26 of the Committee Report approved January 2023.

- The proposed strategic allocation at East Paddock Wood suggests a total of 125 units of older persons accommodation, however currently there is a planning application proposing either a 70 bed Care Home or a 60-bedroom extra care scheme. If the permission is delivered as a Care Home only, it would remove 60 units from the supply. It is unclear where the additional 65 units would be delivered and so these are not included in the supply at this stage.
- 2.11 The Council has persisted in proposing dual allocation on two of the proposed allocation sites. This provides no certainty whatsoever that the need for Extra Care would be met if those allocations come forwards as Care Homes. The shortfall could therefore be as much as 338 units if all these allocations come forward (or remain) as Care Homes or are not delivered in the plan period.
- 2.12 Further, the Council's proposed modifications still fail to take account of the need for Residential Care Homes and identify sufficient supply to meet that need. In our representations at Section 3 we drew reference to the SHMA Update 2017, which found that there was a need for 740 Care Home bedspaces to 2035. This equates to a need for around 37 bedspaces per annum.
- 2.13 The Council has identified a supply of 213 bedspaces from the proposed 3 allocations for nursing and residential care homes listed in Paragraph 3.366 of the Submission Local Plan. As such, there remains a shortfall against the required need.
- 2.14 In conclusion, there is shortfall in the planned supply against the required need for both Extra Care Housing and Care Homes.
- 2.15 Given the slight overlap in the question relating to how the plan can be modified to address this, we set out our suggestions in our response to Question 3 below.

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?

- 2.16 The Council's suggested changes will not meet the needs of older people. Specifically, there will be a shortfall in supply against the need for Extra Care housing and a shortfall in supply against the need for Care Homes. This is not sound, positive or effective planning.

2.17 The Council's suggested changes fail to accord with Paragraph 62 of the Framework and fail to address the critical need for older persons housing in the Borough.

2.18 The implications will be multiple and significant to the Borough's aging population and its services and communities. These impacts are summarised below:

- Additional pressure on social services from older persons who remain in their own home but require support. Extra Care housing provides supported housing for those who wish to and can live independently, but who require additional support.
- Additional pressure on the NHS and emergency services – there is evidence to support that extra care housing reduces pressure on local GP services as on-site and emergency care is available by the provider.
- Limiting independence and increasing social isolation within the aging population. The lack of accommodation choice for older persons will mean that many will be either forced to move out of the area to more suitable accommodation or remain at home in a property potentially too big and/or not suited to their needs.
- Lack of choice within the housing stock – providing sufficient suitable housing for older persons including meeting the needs for extra care and care homes can free up existing housing stock such as releasing family homes into the market.
- Insufficient care home bedspaces will result in older persons remaining in unsuitable accommodation or in hospital. It is proven that the provision of suitable housing for older people in need of care can help reduce hospital stays and having suitable accommodation to return to can speed up the discharge process.

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

2.19 At paragraph 13.11 of PS_054 the Council listed sites which it suggests would meet its needs. As we have pointed out on numerous occasions, these sites will not meet needs in full. Based on our assessment against Question 1 above, we suggest the Council's list of sites is modified as follows:

Extra Care Supply

- Baseline supply - 183 units

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- Extant Permission (Allocation AL/RTW4) Arriva Bus Depot – 89 units
- Extant Permission (Allocation AL/RTW1) Former Cinema site – 166 units
- Total Supply = 438 units
- Shortfall = 338 units

Care Home Supply

- St Michaels Burrswood – 72 bedspaces
- Allocation (AL/PW6) Woodsgate Corner – 100 bedspaces
- Strategic Allocation (STR/SS1) East Paddock Wood – 70 bedspaces
- Allocation (AL/RTW9) Land at Beechwood Sacred Heart School – 69 bedspaces
- Allocation (AL/PE 7) Cornford Court – 68 bedspaces
- Allocation (AL/PE 8) Owlsnest – 76 bedspaces.
- Total Supply = 455 bedspaces
- Shortfall = 285 bedspaces

2.20 Even if it is accepted that 65 units of Extra Care could be delivered at the East Paddock Wood allocation in addition to the 70 bed Care Home, that still leaves a shortfall of 273 Extra Care units.

2.21 Further modifications are therefore necessary to propose additional allocations to meet the shortfall in need for both Extra Care Housing and Care Home bedspaces. In the absence of making specific additional site allocations, Policy H6 could be modified as follows:

The Council will support development proposals for specialist housing for older persons in the following circumstances:

- Where the proposal is within or adjoining the settlement policy boundary.
- Where the proposal is on land within the Green Belt, where Very Special Circumstances are demonstrated that outweigh the harm of the development by reason of inappropriateness. Meeting the critical need for older persons housing is accepted as being a Very Special Circumstance to justify development in the Green Belt.
- Where the proposal provides a retirement village, such as an extra care housing community adjacent to an existing settlement.