

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Note Requested by the Inspector

Local Plan Examination Note for Inspector in response to Action Point 4 regarding Policy H6 Housing for Older People and People with Disabilities

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1.0 Introduction

- 1.1 During the Hearing Sessions on the Tunbridge Wells Borough Local Plan, the Inspector asked the Council to prepare a number of Notes on “Action Points”, essentially to clarify its position on certain matters that were discussed.
- 1.2 This Note relates to Action Point 4 relating to Policy H6: Housing for Older People and People with Disabilities. It follows the hearing session for Matter 8, Issue 6 - Meeting Housing Needs on Thursday 16th June, at which the Inspector queried the effectiveness of Criterion 3 of the policy, which requires that:
- ‘On new build housing developments of 20 or more homes, at least 10 percent of homes should be suitable for older people in that they are bungalows or one or two bed flats/houses.’***
- 1.3 In particular, the Inspector asked the Council to clarify the objectives of the criterion, its expectation in relation to bungalows, and the evidential basis for the requirement.
- 1.4 This Note reviews the evidence and, as a consequence, proposes amended wording of the policy, as well as presenting an outline of additional supporting text.

2.0 Objective of Criterion 3

- 2.1 Paragraph 6.367 of the supporting text explains the rationale behind Criterion 3:
- ‘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. This includes 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.’*
- 2.2 In other words, it is looking to ensure that there is at least a basic proportion of new homes that are suited for older people within the overall housing mix, in line with Policy H1. In developing the criterion, consideration has been given to what this proportion should be, as well as to what type(s) of housing is needed. The evidence is set out below.

3.0 Evidence base

- 3.1 The first piece of evidence relevant to Criterion 3 is the demographic projections. Table 5.11 on page 46 (electronic page 49) of the Icen Projects' 'Review of Local Housing Needs' [CD 3.75] presents population change by 5-year age bands on the basis of housing growth of 678 dwellings pa (as proposed in the Local Plan). Of a total population growth of 16,700 (+14%) from 2020-2037, it can be calculated that the increase in people aged 65+ accounts for **10,295** people, or **61.6%** of the total population growth. It may also be noted that the increase in people aged 65-74 years is **4,435**, or **26.6%** of the total population growth.
- 3.2 This provides a prima facie argument for the Local Plan to promote a significant amount of housing suitable for older people - in a range of forms.
- 3.3 The Housing Needs Study (HNS) [CD 3.19] presents, at Table 6.11 on page 81, the future housing choices of older households within the next 5 years with reference to their current number of bedrooms, highlighting that about a half (51%) aspire to downsize. The HNS also records, at Table 6.10, that one of the main reasons given for households being unable to move is that a suitable property could not be found of the type wanted or in the area wanted.
- 3.4 The Strategic Housing Market Assessment (SHMA) 2015 [CD 3.23] page 19 also recognises the potential for downsizing. It draws attention to Census data from 2011 that suggests that older person households are more likely to under-occupy their housing than other households in the study area. In total, 57% have an occupancy rating of +2 or more (meaning there are at least two more bedrooms than are technically required by the household). This compares with 36% for non-older person households [paragraph 7.16].
- 3.5 The key evidence in relation to the size/type of dwellings is in the HNS at Table ES2 (on page 11). This finds that the profile of new dwelling stock based on the preferences of all households includes **11.2% 1-2 bed roomed houses** and **8.6% bungalows**, as well as 11.7% flats. (It should be noted that the same HNS table also records that there is a higher - 18.9% - need for 1-2 bed, based on expectations, presumably due to affordability constraints.)

- 3.6 The aspirations of existing and newly-forming households requiring affordable housing indicate a somewhat higher – 13.0% - preference for bungalows. (HNS, page 76, paragraph 6,18 and Table 6.7).
- 3.7 The SHMA's [\[CD 3.23\]](#) modelling estimates that there should be a higher proportion of smaller dwellings, stating in Table 50 on page 121 that 1- and 2-bed properties together should comprise 38.7% of the market housing need (9.3% and 29.4% respectively), while Table 52 on page 123 estimates that 1 and 2-bed dwellings should amount to some 76% (44.0% + 32.1%) of the affordable housing supply.
- 3.8 The supporting commentary at paragraph 6.16 notes that, while future housing need can be expected to reinforce around the existing profile, there is a slight shift towards a requirement for smaller dwellings relative to the distribution of existing housing due to the fact that household sizes are expected to fall slightly in the future – particularly as a result of a growing older population living in smaller households.
- 3.9 The SHMA [CD 3.23] goes on to recommend, at Table 3 on page 17, that 15-25% of all new homes (market and affordable) in the borough should be 1-bed and that 25-30% should be 2-bed. Hence, a combined percentage of 45 - 50% can be implied, which compares to the HNS estimate of nearly 40%.

4.0 Summary and Conclusion

- 4.1 It is clear that there is a need for more smaller dwellings associated with the ageing population, especially as the majority of older households, understandably, do not want to move from their current home. [HNS, CD 3.19, Table 6.9, page 80]
- 4.2 It is accepted that the 10% requirement for 1-2 bed homes (or bungalows) as currently proposed in the Submission Local Plan would not be effective as a means of ensuring a supply of smaller, accessible homes for older people. This is primarily because it would be considerably less than the proportions recommended in the SHMA and the HNS for smaller homes – of some 40%+ – which are also needed to assist younger households. Hence, it would be neither sufficient, nor sufficiently targeted.

- 4.3 It is also noted that the introduction of the requirement that First Homes, that should account for at least 25% of all affordable housing units delivered by developers, could, for greenfield sites with a 40% affordable housing requirement, itself fulfil the requirement of 10% smaller dwellings (if all either 1- or 2-bed).
- 4.4 Further consideration has been given, based on the available evidence, of whether Criterion 3, in a varied form, is necessary or helpful in supplementing Policy H1, to ensure that, within any housing mix for larger schemes, there is a minimum level of accommodation that reflects the borough's ageing population.
- 4.5 In terms of affordable housing, there is more control over the mix, as it is informed by the Council, as local housing authority, at the time of an application. The Council, working alongside a Housing Provider, can set out a clear expectation on the appropriate mix, type and size of dwellings, taking account of the needs from both older and younger households.
- 4.6 However, more broadly, as the Council presented in its Hearing Statement [\[TWLP_032\]](#), the Housing Needs Assessment Topic Paper [\[CD 3.73\]](#) endorses (on page 19, paragraph 3.36) the SHMA conclusion (SHMA paragraph 7.32) that:
- “.. providing an element of bungalows should be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households.”*
- 4.7 This is also broadly consistent with the ‘Concluding Comment’ of the HNS, at paragraph 5.30 that:
- “Development more reflective of household expectation would result in developing three and four bedroom houses along with bungalows.”*
- 4.8 As regards the quantum of provision, the HNS advises that some 8.6% of new dwellings should be bungalows, based on existing household preferences. Furthermore, this level of provision may be seen in the context of the borough currently having a very low proportion of bungalow accommodation (4.8%) in the existing housing stock when compared to Kent (23.7%) and the South East (21.7%). ([HNS, Table 4.2 on page 35 and paragraph 5.28 on page 69.]

- 4.9 Overall, the Council remains of the view that the information on demographic projections and household preferences, coupled with the limited existing supply, all point to a need for smaller dwellings and especially bungalows. In relation to the latter, the level of need is clearly at least 5% and towards 10% of total supply, if not possibly higher, even taking account of the prospect for demand to be impacted by the widespread provision of accessible homes, which is also a proposed policy requirement (and now promoted by Government¹).
- 4.10 Therefore, it is proposed that the need for bungalows (in most circumstances) is retained, with a further emphasis on smaller dwellings, as part of the overall approach to housing mix. A suggested rewording of Criterion 3 is:
- ‘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.’***
- 4.11 This would still give the desired policy attention to the housing needs of older people, while being somewhat less prescriptive. At the same time, the 20-dwelling threshold remains appropriate for practical reasons – as one or two bungalows would represent 5% - 10% of the total, which corresponds with the scale of provision identified by the Housing Need Study, as referred to above.
- 4.12 A qualification is necessary in relation to bungalows, as there may be site-specific circumstances where they are not appropriate – central locations more suited to higher density development perhaps being the most obvious example.
- 4.13 The reference to Policy H1 is necessary, as it serves to highlight the need to incorporate smaller dwellings as part of the overall approach to housing mix.
- 4.14 Subject to any further consideration, the above policy amendment, together with new supporting text that highlights the basis for the criterion and its application, will be put forward as a main modification.

¹ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response>