
Examination Statement – Matter 8 Meeting Housing Needs

Tunbridge Wells Local Plan

Representations on behalf of Crest Nicholson

May 2022

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore now Stantec on behalf of our Client, Crest Nicholson, who has an interest in the land to the north west of Paddock Wood that forms a significant part of the housing allocation STR/SS1: The Strategy for Paddock Wood, including land east of Capel, which provides for circa 3,490-3,590 new dwellings across Paddock Wood. This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 These representations respond to the Inspectors' questions within Matter 8 – Meeting Housing Needs. This Statement does not respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.5 These representations have been considered in the context of the tests of 'soundness' as set out at paragraph 35 of the NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2.0 RESPONSE TO MATTER 8 – MEETING HOUSING NEEDS

Issue 3 – Affordable Housing

Question 5: What is the justification for requiring a minimum of 50% of the affordable housing to be delivered on-site prior to completion of 50% of the open market units approved? Is this viable and deliverable?

- 2.1 There is no evidence or justification set out in the draft Local Plan or the Council's evidence base to require a minimum of 50% of the affordable housing to be delivered on-site prior to completion of 50% of the open market units approved. As such it should be deleted.
- 2.2 It is recognised that there is a significant affordable housing need in the borough, and those houses should come forward and be built as soon as possible. However, under the current planning system, most affordable houses come forward as a 'tax' on market houses, and is reliant on housebuilders providing the land, infrastructure, services and facilities.
- 2.3 Such a policy requirement could unduly fetter development, particularly on large sites where there will be many competing requirements for substantial infrastructure both at the beginning of a project and throughout its development, as it progresses in phases.
- 2.4 It is not just about housing numbers or proportions of tenure but about the overall community and the neighbourhoods that will be created over a number of years, in the case of large development. This should be the focus of policy, not the detail of delivery.
- 2.5 Further, this local plan covers the next fifteen years and its objectives and policies may be affected by national or global economic conditions that cannot be foreseen at this time. Such an inflexible policy could be an obstacle to house building proposals coming forward within the Plan period as it could affect viability.
- 2.6 The Government is keen to encourage development to come forward, to provide more homes to meet a growing population and to promote construction and economic growth. Stalled schemes due to economically unviable affordable housing requirements result in no development, no regeneration and no community benefit and this should be reflected in Policy H3 by removing criterion 3.

- 2.7 Such a policy requirement is also unnecessary as s106 Agreements are able to adequately set out an agreed schedule of provision of affordable housing alongside market homes, whilst acknowledging and taking account of the specific circumstances of each development, its phasing; its required infrastructure as well as other financial commitments.

Issue 6 – Housing for Older People and people with Disabilities

Question 3: What is the justification for requiring all new build development to meet the optional technical M4(2) standard? Is the requirement viable and what contribution will it make to identified needs?

- 2.8 It is accepted that the number of older person households will increase more than households overall the population and housing needs within the Local Plan period will require some homes that are capable of meeting changing needs over time.

- 2.9 Paragraph 3.52 of the Housing Needs Assessment Topic Paper (February 2021) states,

*“...the HNS clearly demonstrates the strong desire of many older people to continue to live in their current homes. This is likely to generate a greater need for smaller housing units (bungalows and/or 1 or 2 bed flats/houses). It also seems inevitable that **a proportion** will need some assistance and/or adaptations. An increase in the provision of accessible and adaptable homes will provide older people with more choice and reduce the reliance on sheltered accommodation to meet their needs. (author’s emphasis)*

- 2.10 Paragraph 3.53 goes on to say,

“Hence, there is a strong argument for requiring new housing to be accessible and adaptable, especially for affordable homes and for policies, as well as the allocation of specific sites, that will address the provision of a variety of housing types for older people.”

- 2.11 This suggests that a **proportion** of new homes should be adaptable. There is no evidence to suggest it should be all homes. In fact, the statistics set out in paragraph 3.49 of the Topic Paper state that only 26.3% of older people would consider buying a property on the open market and over half looking to downsize. This would suggest that somewhere between 25-50% would be a more appropriate figure. Policy H6 should be amended accordingly.

2.12 The information gathered and set out in the Housing Needs Assessment Topic Paper is a snapshot in time. Attitudes/trends of older people on living in their own homes may change over the lifetime of the Plan. The house building industry is already seeing attitudes starting to change towards older people wanting more specialised accommodation, with services and facilities built-in and readily available. As that part of the market changes and the products on offer evolve, these attitudes may continue to change further. Provision of specialised older person accommodation is being dealt with elsewhere in the Plan and within strategic site allocations, such as STR/SS1; hence the need for 100% adaptable homes is unnecessary.