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# EXAMINATION STATEMENT – MATTER 02

## *Issue 1 – Housing and Employment Needs*

### Tunbridge Wells Local Plan

Representations on behalf of  
Dandara South-East Ltd

May 2022

**EXAMINATION STATEMENT – MATTER 02**  
*ISSUE 1 – HOUSING AND EMPLOYMENT NEEDS*  
**TUNBRIDGE WELLS LOCAL PLAN**  
**REPRESENTATIONS ON BEHALF OF:**  
**DANDARA SOUTH-EAST LTD**  
**MAY 2022**

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## **1.0 INTRODUCTION**

1.1 This Statement has been prepared by Barton Willmore now Stantec on behalf of Dandara South-East Ltd. Barton Willmore is acting on behalf of Dandara regarding its land interest at "Land west of Eridge Road and Spratsbrook Farm", Tunbridge Wells – an allocated site of approx. 120 dwellings (Policy AL/RTW16) in the emerging Tunbridge Wells Local Plan.

1.2 Dandara broadly supports the Local Plan and is submitting other Matter Statements to the examination, as prepared by CBRE. This Matter Statement focuses on the "housing need" elements to the Local Plan, as follows:

- The Local Plan seeks to meet the Government's "capped" Standard Method for new homes (678dpa) over an 18-year Plan period (2020 – 2038) – this entails a need for 12,204 units which is recognised and supported by Dandara.
- The Local Plan seeks to provide 13,069 – 13,444 dwellings during the Plan period – taking the mid-point of this provides a buffer of 8.6% (1,080 units).
- Dandara considers that the Local Plan should seek to provide an uplifted buffer of 20% in order to address potential for unmet needs arising from neighbouring authorities, as well as previous shortfalls and affordability/affordable housing issues in the Borough.
- This will entail a housing need of 813dpa or 14,634 units (over 18 years) which will secure a flexible supply of housing land across the entire Plan period.
- This will ensure a sound and effective Local Plan.

## 2.0 RESPONSE TO MATTER 02: HOUSING AND EMPLOYMENT NEED

**Main Issue:** To determine the minimum number of homes needed, para 61 of the National Planning Policy Framework states that the 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.

### QUESTIONS

#### Issue 1 – Housing Needs and the Housing Requirement

- Q.1 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 ("PPG").*
- Q.2 Are there exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?*
- Q.3 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?*

- 2.1 The answers to these questions are intertwined so are therefore set out below.
- 2.2 The 2019 NPPF introduced the "Standard Method" for calculating **minimum** local housing need, replacing the Objectively Assessed Need (OAN). The **minimum** need calculated (678dpa) by this method is higher than the OAN (648dpa) for Tunbridge Wells BC. However, it is important to note how this figure is "capped" and in line with the PPG (ID2a-007), "The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible". Equally, the PPG also adds that "The cap reduces the minimum number generated by the standard method, but

*does not reduce housing need itself*" (our emphasis). If the Standard Method were "uncapped", it shows a need of 741dpa in TWBC.

2.3 Dandara recognises that the Local Plan seeks to meet the Government's "capped" figure of 678dpa. Nonetheless, Dandara considers that housing need should be considered in the context of a minimum figure and in line with the PPG, circumstances dictate that an uplift on the minimum requirement should be applied. The reasons for the proposed uplift are to:

- Respond to potential unmet needs from neighbouring authorities; and
- Address affordability issues including affordable housing provision.

*a) Responding to potential unmet needs from neighbouring authorities*

2.4 The issues relating to TWBC's engagement with neighbouring authorities has been addressed at lengths as part of the "Duty-to-Cooperate" matter of the examination. The salient issues are therefore not repeated here, yet we note that TWBC shares the "West Kent Housing Market Area" with Sevenoaks DC and Tonbridge and Malling BC. Furthermore, TWBC also has direct functional links with Wealden DC, the administrative boundary of which is immediately south of Tunbridge Wells town.

2.5 It is noted that each of the above authorities has withdrawn Local Plans from examination in the past 2-3 years. All three authorities are therefore in the process of "starting afresh" with new Local Plans. Accordingly, each Council is somewhat off establishing the extent of housing it is proposing to deliver and whether or not this will lead to unmet need arising due to constraints or other factors.

2.6 The present Standard Method requirement for Sevenoaks DC entails a need for 711dpa. This is a significant uplift on the existing Core Strategy requirement (165dpa). Against this requirement, it is noted that 93% of land in Sevenoaks comprises Green Belt and that this was the principal reason for the previously sought unmet need of 1,900 units in the District.

2.7 Tonbridge and Malling BC has a need to deliver 843dpa at the present time, in line with the Standard Method. Again, this represents a significant uplift on the previous OAN (696dpa) and Core Strategy requirement (425dpa). Constraints in the Borough include c. 70% Green Belt which predominantly lies in the West Kent HMA area of the Borough (note - TMBC comprises 2no. HMAs in the west and east of the Borough).

- 2.8 The Standard Method for Wealden DC entails a requirement for 1,225dpa – a figure significantly increased from the Core Strategy requirement (450dpa). This would equate to a need for 24,500 new dwellings over a 20-year Plan period, as is being proposed by WDC. This represents a significant uplift on the current Core Strategy requirement. Wealden is a large, yet predominantly rural District aside from urban areas of Hailsham/Stone Cross, Uckfield, Crowborough and edge of Tunbridge Wells. Constraints in Wealden relate to the South Downs National Park as well as the implications on water quality on the Pevensey Levels RAMSAR site – both in the south of the District.
- 2.9 The above demonstrates significant uplifts in housing need which are summarised as follows:

*Table 1: Housing requirements of neighbouring authorities*

	<b>Previous Requirement</b>	<b>Standard Method Requirement</b>
<b>Sevenoaks DC</b>	165dpa	711dpa
<b>Tonbridge and Malling BC</b>	425dpa	843dpa
<b>Wealden DC</b>	450dpa	1,225dpa

- 2.10 It is acknowledged that the progress and outcomes of the emerging Local Plans for the above authorities is presently unknown – this includes the potential for arising unmet needs. However, given the constrained nature of each of the authorities, as well as the significant levels of uplifted need identified, it is considered that unmet need is likely to arise from such authorities.
- 2.11 Accordingly, we have recommended (through CBRE’s Matter Statement on the Duty to Cooperate) that a review mechanism be inserted to the Local Plan. This will enable unmet needs to be considered/addressed in the TWBC Local Plan should they arise through neighbouring Local Plans.
- 2.12 Against this background, there are further measures that should be undertaken to ensure potential for unmet needs are addressed. This includes increasing dwelling capacity/density on sites identified to come forward later in the Plan period – land at Spratsbrook Farm is one such site which could accommodate an additional c. 50 dwellings. A further measure would include the provision of additional reserve sites.
- 2.13 Accordingly, it is thereby recommended that a 20% buffer is added to the current “capped” housing need figure. The current buffer (8.6% - 1,080 units) has been

considered in the context of meeting SDC's unmet needs only. An increased 20% buffer (totalling 813dpa) would provide flexibility to account for potential additional unmet needs from TMBC and WDC, as well as any potential increment from SDC. In line with the NPPF, this uplift in supply will provide the appropriate flexibility to ensure that the potential for unmet needs arising from neighbouring authorities is met.

***b) Addressing Affordability and Affordable Housing Provision***

- 2.14 The ability to afford a home is a problematic issue in TWBC. This is the result of many socio-economic factors; one of which relates to housing demand and the shortfall in supply. Delivery over the past 10 years (2011/12 – 2020/21) has averaged 367dpa in TWBC<sup>1</sup>. This is **nearly half** of TWBC's previous OAN (648dpa) determined under the policies of the 2012 NPPF.
- 2.15 To put the affordability issues in context, the median affordability ratio in Tunbridge Wells is currently 13.27. This means a household earning a median salary would require 13.27 times that salary to afford a median priced home in the Borough. A median priced home costs £390,000 as of 2020. The median affordability ratio (13.27) compares to an average of only 7.84 nationally, 9.92 in the south-east, and 10.06 across Kent. This means the ratio in Tunbridge Wells is 69% higher than the national average, 34% higher than the regional average, and 32% higher than the Kent average. The ratio is also the 12<sup>th</sup> highest in the country outside of London.
- 2.16 It is clear that additional housing is required in the Borough to address the acute affordability problems inherent, which have only been exacerbated by the shortage in delivery over the past decade. Furthermore, delivery of affordable homes in the Borough has also been low over the past decade. This has amounted to an average of 92dpa which is c. 25% of all new net housing completions<sup>2</sup>. This is somewhat short of the 40% affordable housing provision sought in the emerging Local Plan.
- 2.17 The above sets out the difficulties in the Borough in addressing affordability including the ability to access an affordable home. Arguably, the affordable housing ratio has been factored into the Standard Method calculation for the Borough. However, given the seriousness of the recent affordability issues including affordable housing shortfall, it is recommended that a 20% buffer is added to the "capped" Standard Method figure. The PPG (ID2a-024) enables for such an increase to occur where it could help in the delivery of the required number of affordable homes.

<sup>1</sup> TWBC Authority Monitoring Report (2020/21) – table 19 / pp. 39 refers.

<sup>2</sup> TWBC Authority Monitoring Report (2020/21 – table 26 / pp. 54 refers.



- 2.18 A 20% buffer is therefore considered appropriate having regard to the above market signals and the need to address affordability concerns. This will in turn address both supply and demand, thereby driving down price. Such a buffer has been accepted at examinations for other nearby local authority areas with similar/lower affordability ratios including Mid Sussex (2017/18) and Guildford (2018) based on persistent under-delivery of housing, a characteristic shared by TWBC. Both authorities have lower median affordability ratios than TWBC as of 2020 (ratios of 12.62 and 12.21 respectively).
- 2.19 Whilst recognising that both Mid Sussex and Guildford Local Plans were considered under a different housing need context/requirement (OAN), the Inspector to the Mid Sussex plan concluded that a 20% buffer be *"brought forward from later in the plan period in recognition of past long term under-delivery."* This was based on 57% delivery of the previous Development Plan requirement in Mid Sussex over 10 years.
- 2.20 TWBC's delivery (367dpa on average) against OAN (648dpa) is similar at 56% of the requirement. In the case of Guildford, a 20% buffer was also applied for past persistent under-delivery. Prior to the start year of the Guildford Local Plan (2015), delivery had averaged 207dpa over 10 years. This represented 64% of Guildford's "interim" housing requirement agreed in May 2012 (322dpa) and only 30% of the OAN determined during the preparation of the Plan. In the light of the above, an additional 20% buffer should be applied to the TWBC Local Plan.

**c) Summary**

- 2.21 In the context of the above analysis, it is considered that a 20% buffer should be added to the "capped" housing requirement for the Local Plan.
- 2.22 Whilst it is recognised that the Local Plan does seek to include a buffer of c. 1,080 units (c. 8.6%), it is considered that this should be uplifted to 20% in order to:
- Respond to potential unmet needs from neighbouring authorities; and
  - Address affordability issues including affordable housing provision in the Borough.
- 2.23 This would result in a total Local Plan requirement of 813dpa or 14,634 units over the 18-year Plan period. This will ensure a sound and effective Local Plan.