

## Home Builders Federation

### Matter 8

## TUNBRIDGE WELLS LOCAL PLAN EXAMINATION

### Matter 8 – Meeting housing needs

#### Issue 3 – Affordable Housing

Q1. What is the justification for requiring 40% affordable housing on qualifying greenfield sites and 30% on qualifying brownfield sites in Policy H3? What are the figures based on, how were they calculated and what alternatives were considered?

No comment.

Q2. Paragraph 65 of the Framework states that where major development involving the provision of housing is proposed, planning policies should expect at least 10% of the total number of homes to be available for affordable home ownership. How will the Plan secure this?

No comment.

Q3. What is the justification for developments of 6-9 units providing a financial contribution towards affordable housing in the High Weald AONB? What is this threshold based on?

No comment.

Q4. Where First Homes are concerned, the PPG states that where local plans have reached advanced stages of preparation, they will benefit from transitional arrangements and will not need to reflect the First Homes policy requirement. It also states that in such circumstances, consideration should be given to the need for an early update of the Plan. Is this necessary for soundness?

Either the Council should set out that it will undertake an early update of the plan to take account of First Homes or establish how this will be delivered within the policy. If the Council consider the current policy is sufficiently flexible to deliver First Homes as part of the tenure split then it should establish this within the policy. If not then it should state that an early update to the plan or supporting guidance will be undertaken. The





objective of such a statement is to provide clarity to both the applicant and decision maker as to how the Council intends to address the issue of First Homes should the local plan be found sound and adopted.

Q5. 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?

No comment.

Q6. What is the justification for requiring all forms of affordable housing to be provided on the basis of a local connection?

No comment.

### **Issue 6 – Housing for Older People and People with Disabilities**

Q1. Paragraph 62 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including housing for older people and people with disabilities. What is the need for housing for older people and how will this be met over the plan period? Has the Council considered the need for different types of accommodation, such as sheltered accommodation?

No comment.

Q2. What is Policy H6(3) based on? Is it justified on all new build developments, and will the requirement be deliverable?

No comment.

Q3. 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?

The Council's justification for requiring all new homes to be part M4(2) is based on the fact that an ageing population will mean that there are more people in need of an accessible home. Whilst we would not dispute the fact that an ageing population means that some homes will need to be made more accessible this does not necessarily require all new homes to be built to part M4(2).

Firstly, as the Council's evidence indicates, most older people want to stay in their current home and have their needs met in that home. However, some older people will want to move home for a variety of reasons but is worth noting that a new home will be significantly more accessible than many homes in the existing housing stock and the necessary adaptations highlighted by the Council in paragraph 3.50 of the Housing Needs Assessment Topic Paper such as additional handrails and stair lifts could be





made to home built to the mandatory regulation M4(1) when required. Secondly, not all those identified having a long-term illness will necessarily require a more accessible home. Table 6.14 of the Housing Needs Assessment which is referred to in the topic paper shows that 8.1% of the population have an illness of disability that affects their mobility. As we outline in our representations this is not significantly different to the English Housing Survey which noted that 9% of all households in England had one or more people with a long-term limiting illness or disability that required adaptations to their home.

Given that the NPPF requires councils to justify the need for this optional requirement the HBF do not consider the Council to have provided the necessary evidence for all homes to be built to part M4(2).

Q4. What is the justification for requiring 5% of affordable housing on schemes of 20 or more units to meet the optional technical M4(3) standard? Is the requirement viable and what contribution will it have to identified needs?

The Housing Needs Survey found that 5.3% of homes had been adapted for a person with a long-term illness or disability. However, what is not clear from this evidence is whether those adaptations were made to support a wheelchair user. As indicated above these modifications may relate to handrails and stair lifts and not to the more significant adaptations required by a wheelchair user. Given that national data indicates that around 3% of households contain an individual with at least one wheelchair user and there is no evidence to suggest Tunbridge Wells is any different the HBF would suggest that this requirement is reduced.

Q5. How does the Plan take into account site specific factors such as vulnerability to flooding, site topography and other circumstances (such as step-free access) which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings?

Specific reference should be made in policy to those circumstances where site specific factors may make it impossible to deliver the proposed accessibility requirements to provide clarity to both decision makers and applicants.

Q6. Is it necessary to distinguish between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings?

It is necessary to distinguish between a wheelchair adaptable home and a wheelchair accessible home given that paragraph 56-009 of Planning Practice Guidance states that local plan policies for wheelchair accessible homes can only be applied where the Council are responsible for allocating or nominating the person to live in that dwelling.

## **Issue 8 – Self-Build and Custom Housebuilding**





Q1. What is the need for self-build and custom housebuilding schemes and how will this be met over the plan period?

No comment.

Q2. What is the justification for requiring 5% of the total number of dwellings to be custom and self-build plots on the allocations listed in Policy H8? Why these sites and not others?

No comment.

Q3. Where plots have been marketed and are unsold, what is the reason for requiring plots to be then offered to the Council? Is this justified?

The HBF do not agree with the need for these to be offered to the Council after a six-month marketing period. If the plots have been marketed in the approach proposed in the policy, then there is no justification for it to be offered to the Council prior to it being built out by the developer. As set out in our statements the requirement should be deleted from this policy.

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