



The countryside charity

Kent

## Matter 8 - Meeting Housing Needs (Policies H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and H12)

### Issue 7 – Housing Mix

*Q1. Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H1?*

While CPRE Kent supports this policy we agree with the Royal Tunbridge Wells Town Forum that it should be strengthened by substituting the word “shall” for “may” in the second paragraph. (CD\_3.125b(iv) Section 6 Development Management Policies)

### Issue 2 – Housing Density

*Q1. Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H2?*

CPRE Kent considers it is not sufficiently clear what is required of planning permissions under Policy H2. The NPPF devotes an entire chapter to making effective use of land, yet this policy is only two and a half lines long. NPPF paragraph 125(a) requires plans to set minimum density standards for city and town centres and other locations that are well served by public transport, and 125(b) says the use of minimum density standards should also be considered for other parts of the plan area, yet this policy does not set any minimum density standards at all.

The Council should

- reinstate the statement (removed from the Regulation 18 version of the plan) that planning applications for developments that fail to make efficient use of land will be refused;
- provide density ranges for urban, suburban and outer suburban areas, with the higher densities applying unless the context of the site, including its character, landscape setting, topography, surrounding built form, and access to infrastructure and services, justifies a density at the lower end of the range; and
- apply minimum outer suburban density ranges also to rural and edge-of-village sites.

The Council should also ensure that proposed allocations comply with these densities. (Please see our comments on strategic policies and on various allocations).

*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?*

CPRE Kent would like to repeat the observations in our representations to the Council’s Regulation 19 consultation.

As shown in Table 4 of CPRE’s report “Beauty Still Betrayed”

<https://www.cpre.org.uk/resources/beauty-still-betrayed-the-state-of-our-aonbs-2021> , only 16% of dwellings built in AONBs between April 2016 and August 2020 met the definition of affordable housing.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

CPRE Kent Queen’s Head House, Ashford Road, Charing, Kent TN27 0AD  
[www.cprekent.org.uk](http://www.cprekent.org.uk) Phone 01233 714540 Email [info@cprekent.org.uk](mailto:info@cprekent.org.uk)

Registered charity (number 1092012), limited company registered in England (number 4335730)

AONBs are, by definition, rural. CPRE's survey on why young people feel forced to leave rural areas [2021\\_CPRESurvey\\_Young-people-in-rural-areas\\_full-report.pdf](#) suggested that lack of affordable housing was an important factor for 84% of them.

While CPRE fully support the requirement for housing developments of fewer than 10 dwellings in the High Weald AONB (HWAONB) to make a contribution towards providing affordable housing, we do not understand why this should be a financial rather than a physical contribution or why the threshold for financial contributions should be set at 6 dwellings. Given that major developments in AONBs are generally only permissible in exceptional circumstances, the majority of housing developments in the HWAONB will be minor developments. This makes it vital that minor developments in the HWAONB should also provide affordable housing. If minor developments merely provide a financial contribution, that money may be used to provide affordable housing outside the AONB where land prices tend to be lower, further exacerbating the already acute lack of affordable housing in the AONB.

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

This is very important in the villages and rural area, especially in the AONB, where the lack of affordable housing for existing residents and their families is a major problem and where lack of frequent public transport extending into the evenings makes visiting other settlements difficult for those without a car. Residents feel strongly that if they are to lose valued countryside to a new housing development, then the local community should at least receive the benefit that affordable housing in the new development would first be offered to local residents and workers.

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

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

As major housing developments are only permitted in exceptional circumstances, the threshold in H6(3) should be 10 dwellings (or perhaps even fewer), to ensure that at least some smaller developments within the AONB provide housing suitable for older persons.

*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?*

In this Borough with an increasingly elderly population it is our understanding that a relatively large proportion of the Borough's existing housing stock in the High Weald AONB and the rural areas consists of listed historic and older unlisted buildings that are not accessible or adaptable for people with disabilities. This policy, requiring this optional standard, is needed in order to redress the balance, ensuring that there will be sufficient accessible and adaptable housing stock to meet the needs of the population. CPRE understand that KCC now normally require all new housing development to meet the M4(2) standard unless there are particular circumstances that make it inappropriate.

*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?*

The policy does already contain the provisos “in a manner proportionate to the scale of the proposal” and “unless demonstrably unviable”. However, a carefully worded modification to enable these site-specific factors (flooding, topography and other circumstances) to be taken into account would seem reasonable.

*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?*

While it is reasonable for wheelchair accessible dwellings only to be required in affordable housing, where the residents are very unlikely to be able to afford to pay for the necessary adaptations themselves, there is also an unmet need for wheelchair adaptable market housing, where the residents may well be able and willing to afford to pay for the adaptations themselves. This unmet need will increase as the population ages.

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

*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?*

Given the pressing need for affordable housing in the borough, and given that a major reason for requiring the provision self- and custom-build plots is that this can enable people who would otherwise not be able to afford a house to build their home, the land is needed for the Council to build affordable housing on if it is not to be used for self-build.

#### Issue 9 – Replacement Dwellings

*Q1. What is the justification for only permitting replacement dwellings where the existing structure is unsafe?*

The policy does not limit it only to where the structure is unsafe, but in various other circumstances, and CPRE supports these.

*Q2. Where a dwelling is to be replaced, what are the reasons for criterion a) to d)? Are they justified in all locations, even outside areas of Green Belt?*

Yes, these criteria are justified in order to protect the landscape and the countryside, and they are particularly justified in the AONB and its setting.

#### Issue 10 – Residential Extensions, Alterations, Outbuildings and Annexes

*Q1. What is the justification for restricting the size of extensions outside the Limits to Built Development as set out in Policy H11 criterion a) – b)?*

This is necessary in order to protect the countryside and especially the AONB landscape, to prevent further occasions when, as has happened in the past, an initially very small and unobtrusive rural building such as a two-bedroom farm bungalow is gradually converted, by repeated planning applications, into a two or three storey house with five or six bedrooms, five or six bathrooms and a substantial garage.