

# Tunbridge Wells Borough



## **Housing Needs Assessment Topic Paper for Draft Local Plan – Regulation 18 Consultation August 2019**

## Table of Contents

Introduction and Purpose .....	1
Part 1: Overall Housing Need.....	2
Plan period and housing needs .....	2
Use of the 'Standard Methodology' for calculating housing need .....	2
Regard to demographic trends and market signals.....	4
Consultation feedback .....	5
Regard to housing need in neighbouring authorities .....	5
Part 2 – Particular Housing Needs .....	7
Introduction .....	7
(a) The need for affordable housing .....	7
(b) The need for private rented housing .....	11
(c) The housing needs of older people .....	11
(d) The housing needs of people with disabilities .....	13
(e) The housing needs of Gypsies, travellers and travelling showpeople.....	14
(f) The need for self-build and custom housebuilding opportunities.....	16
(g) The need for a proportion of smaller housing sites.....	19
Summary of particular housing needs.....	20
Appendix 1: Application of the 'Standard Method' to assessing the housing need for Tunbridge Wells Borough) .....	- 1 -
Appendix 2: Housing tenure by parish (2011 Census) .....	- 7 -

## Introduction and Purpose

1. Tunbridge Wells Borough Council is undertaking a full review of its Local Plan. Assessing housing need is the first step in the process of deciding how many homes need to be planned for<sup>1</sup>. This is an objective assessment, separate from and prior to the consideration of the potential to meet this need through ‘sustainable development’.<sup>2</sup>
2. National policy is clear in expecting local plans to “*positively seek to meet the development needs of their area*”<sup>3</sup>. It adds that, “*to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed*”, adding that the needs of groups with specific housing requirements should be addressed.<sup>4</sup>
3. Hence, the purpose of this paper is two-fold:
  - **Part 1** identifies the **overall housing need** for the borough that the Local Plan should aim to meet over the plan period
  - **Part 2** identifies the **particular housing needs**, respectively relating to:
    - a) The need for affordable housing
    - b) The need for private rented housing
    - c) The housing needs of older people
    - d) The housing needs of people with disabilities
    - e) The housing needs of Gypsies, travellers and travelling show people
    - f) The need for custom and self-build housebuilding opportunities
    - g) The need for a proportion of smaller housing sites
4. The findings of these assessments provide both a starting point for seeking development opportunities to meet the overall need and for developing policy approaches to meet the specific identified housing needs within the population.

---

<sup>1</sup> PPG paragraph 001 Ref. ID: 2a-001-20190220

<sup>2</sup> NPPF paragraphs 7 and 8

<sup>3</sup> NPPF paragraph 11

<sup>4</sup> NPPF paragraph 59

## Part 1: Overall Housing Need

### Plan period and housing needs

5. Local Plans should look ahead at least 15 years.<sup>5</sup> Furthermore, in relation to housing, the NPPF paragraph 67 adds:  
*“Planning policies should identify a supply of:  
a) specific, deliverable sites for years one to five of the plan period,<sup>6</sup> and  
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
6. The programme for the Local Plan, as set out in the current Local Development Scheme<sup>7</sup> envisages adoption in late 2021. Hence, the Local Plan should look forward to at least 2036. This is also regarded as an appropriate timeframe, given the need to ensure there is a local plan in place as soon as practicable to properly manage development, increasing levels of uncertainty over time and the requirement for a five-yearly review.
7. Hence, housing need calculations cover the period up to 31<sup>st</sup> March 2036.
8. It is noted that the current base date of the Local Plan is 1<sup>st</sup> April 2016, although this may be updated, having regard to Government guidance on calculating housing need, for the submission version of the Local Plan.

### Use of the ‘Standard Methodology’ for calculating housing need

9. The NPPF states, at paragraph 60:

*‘To determine the minimum number of homes needed, 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.’*

10. Details of the use of the Standard Method to calculate the minimum annual housing need figure are set out in supporting Planning Practice Guidance PPG<sup>8</sup>. The PPG also makes clear that other methods of calculating ‘housing need’ will only be allowed in exceptional circumstances and would be closely scrutinised at examination.<sup>9</sup>

---

<sup>5</sup> NPPF paragraph 22

<sup>6</sup> With an appropriate buffer

<sup>7</sup> <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/local-development-scheme>

<sup>8</sup> Planning Practice Guidance: Housing Need Assessment, Paragraph ID 2a-004

<sup>9</sup> Planning Practice Guidance: Housing Need Assessment, Paragraph ID 2a-003

11. It is pointed out that the Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply<sup>10</sup>. Hence, there is no need to consider need and supply matters before the base year of the Local Plan.
12. There is one qualification to the use of the Standard Method. Where it identifies a minimum local housing need figure that is significantly higher than the number of homes currently being planned for, a “cap” is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible. This is set at 40% above the household projections or the existing Local Plan figure, whichever is the higher.
13. The calculation of housing need and in respect of Tunbridge Wells borough, the application of the cap are set out in Appendix 1 and summarised below.
14. It can be seen that the projected average annual household growth over 10 years beginning with the current year (2019) is 487 dwellings per year. However, the Guidance advises that the figure should be kept under review and revised where appropriate. Moreover, it advises that the figure applicable at the time of submission may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination. Therefore, it is sensible to use this figure (i.e. for the period 2020 -2030) in preparing the Local Plan at this stage.
15. On this basis, the relevant household projection is **484 dwellings/year**.<sup>11</sup> Due to the substantial increase in the housing need under this method, relative to the projected household growth (aside from the fact that it is also more than double the current Core Strategy housing requirement of 300 dwellings per year), the above-mentioned 40% increase cap comes into play.
16. Hence, **the housing need for Tunbridge Wells borough is 678 dwellings<sup>12</sup> per year, or 13,560 net additional dwellings over a plan period 2016-2036**. It is noted that the uncapped figure is 749, whereas the capped figure of 678 is a little (9.5%) lower.
17. Notwithstanding the above, the Government has indicated that it will be reviewing the methodology in the next eighteen months, but this has yet to be determined. This is because the current methodology relies on dated, 2014-based projections, instead of newer projections. The Government reasoning for continuing to use these, on an interim basis, is to provide stability and certainty to the planning system in the short-term, noting also that the standard method does not represent a mandatory target for local authorities to plan for, but the starting point for the planning process.<sup>13</sup>

---

<sup>10</sup> Planning Practice Guidance: Housing and economic needs assessment, Paragraph 4.

<sup>11</sup> This is the 2030 figure (56,293) minus the 2020 figure (51,450) = 4,843, divided by 10 years = 484 pa

<sup>12</sup> Based on 484 dwellings pa multiplied by the cap of 140% = 678 dwellings pa

<sup>13</sup> Government response to the technical consultation on updates to national planning policy and guidance: A summary of consultation responses and the Government’s view on the way forward, February 2019

## Regard to demographic trends and market signals

18. As that the cap on housing need comes into play for the borough, it is important to consider whether demographic trends and market signals suggest that the Local Plan should set a higher target than that set out by the Standard Method.
19. The PPG highlights<sup>14</sup> that while the cap reduces the minimum number generated by the standard method, it does not reduce housing need itself. Therefore, where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.
20. The SHMA<sup>15</sup> gave consideration to market signals, finding that there has been a fundamental shift in housing markets since 2007, particularly in relation to confidence and credit availability, affecting sales volumes. However, house prices continue to increase in the borough and to be relatively high for Kent, (albeit similar to other areas around London) while affordability ratios are also relatively high. For this reason, also having regard to previous inspectors' views, a 10% uplift on the objectively assessed need (OAN) was recommended. This was applied to an OAN figure of 631 dwellings per year. Of course, this approach pre-dated the introduction of the Standard Method.
21. It is noted that the Standard Method figure of 678 dwellings per year itself effectively involves an uplift of nearly 7.5% ( $678/631 \times 100$ ) on that earlier OAN.
22. The SHMA also looked at economic growth projections and its relationship to housing growth potential. It found that the likely job growth scenario implied a housing need of 572 dwellings per year; the implication being that higher housing growth would rely on greater net out-commuting, with associated transport impacts, assuming a sufficient supply of jobs within the wider area.
23. Of particular note, the capped Standard Method figure is well in excess of recent build rates. On average, 464 net additional dwellings have been built over the last five years. Hence, not only is the new target **more than double the current (2010) Core Strategy requirement** of 6,000 net additional dwellings over 20 years (300pa), it will represent a **46% increase in actual construction**; i.e. it implies a very substantial boost to housing delivery.
24. In conclusion, while a higher level of housebuilding may help address affordability, also having regard to the fact that there is no accompanying economic need for an upwards adjustment (in fact, arguably a downward one) and that the Standard Method capped figure itself represents a level of housebuilding 40% above the projected household growth for the borough, then **at least 678 dwellings a year** is an appropriate figure for overall need to be sought through the new Local Plan for the borough. The need for, and potential means to increase, the supply of affordable homes within this overall target is considered below.

---

<sup>14</sup> PPG: Housing and economic needs assessment, Paragraph 7

<sup>15</sup> SMHA 2015 and SHMA Update 2017

## Consultation feedback

25. A number of local people commented at the 'Issues and Options' stage. Purely in relation to housing needs, comments were varied, but notably that the large increase in the housing target is unrealistic. "Brexit" was seen as potentially reducing housing migration pressures. There is a stated focus on meeting the housing needs of local people, including those in rural areas.
26. At the same time, an increasing supply of affordable homes was sought, as was a range of housing options to meet the needs of older people. This includes opportunities for downsizing. Indeed, there was a general call for more smaller, hence more affordable, homes.
27. Another notable concern was about matching housing growth with job supply.

## Regard to housing need in neighbouring authorities

28. NPPF paragraph 60 advises that any unmet need within neighbouring authorities should also be taken into account in establishing the amount of housing to be planned for.
29. Supporting Guidance also advises that identifying the 'housing market area' is appropriate to assist in prepare policies for meeting housing need across local authority boundaries.<sup>16</sup>
30. The SHMA defines the relevant housing market area as being the 'West Kent Housing Market Area' (HMA), which includes Sevenoaks, Tonbridge and Tunbridge Wells and extends to include Crowborough, Hawkhurst and Heathfield. In terms of 'best fit' to local authority boundaries, Sevenoaks has the greatest association with Tunbridge Wells borough. Tonbridge & Malling is effectively split, with part of the borough (Tonbridge) relating to this HMA, and part (Malling) towards Maidstone. In any event, given the various cross-boundary interactions, consideration is given to the housing need and supply situation in all neighbouring local authority areas.
31. The plan-making situation in neighbouring authorities is set out below:

<b>Other Local Planning Authorities (LPAs) plan-making positions.</b>
<b>Ashford</b> – Adopted Local Plan, February 2019
<b>Maidstone</b> – Adopted Local Plan, October 2017
<b>Rother</b> – Adopted Core Strategy, September 2014 (submitted sites local plan)
<b>Sevenoaks</b> – Submitted Local Plan
<b>Tonbridge &amp; Malling</b> – Submitted Local Plan
<b>Wealden</b> – Submitted Local Plan, January 2019

<sup>16</sup> Paragraph: 039 Reference ID: 61-039-20190315

32. Of the LPAs with submitted Local Plans, **Wealden** and **Tonbridge and Malling** both indicate that they are meeting their local housing needs, although as both Local Plan are currently at examination, they are subject to change. **Sevenoaks** has a housing need of 707 dwellings/year, equivalent to 11,312 dwellings over its plan period (2019-2035). However, its identified supply leaves a shortfall of some 1,900 dwellings. It does not have any arrangement in place to meet this unmet need at the present time.
33. **Maidstone** met its housing need in full through its Local Plan. Although a review is just beginning, it is too early to know if it will be able to meet its future need. However, it has previously met its housing need and is not so constrained by Green Belt or Area of Outstanding Natural Beauty (AONB) designations. **Ashford** has met its housing need through its very recently adopted Local Plan up to 2030.
34. **Rother** has recently set out its intention to prepare a new Local Plan, but has yet to undertake substantive work on it, so there is no indication of an unmet need.
35. It follows that consideration should be given to the scope for meeting at least some of the unmet housing need from Sevenoaks, especially as it is associated with Tunbridge Wells borough in housing market area terms, in addition to the housing needs of the borough itself. Clearly, as with Sevenoaks, this must also have regard to maintaining the effectiveness of the Metropolitan Green Belt, as well as conserving the landscape character of the AONB.



## Part 2 – Particular Housing Needs

### Introduction

37. This Part considers the housing needs of those groups highlighted in the NPPF, with the exception of student housing, as there are no further education establishments in or close to the borough that generate a material level of demand for student housing.
38. It is also noted that the needs identified for each group do not necessarily equate to targets for the Local Plan. Rather, they should be considered in the context of the overall housing need figure calculated using the Standard Method. This recognises that the need for housing for particular groups of people may well exceed, or be proportionally high in relation to, the overall need. This may well be because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. Hence, the Local Plan will need to produce policies to address the needs of specific groups as effectively as possible within the overall need established.

#### (a) The need for affordable housing

39. Affordable housing accounts for about 16% of the total stock of properties in the borough, the large majority of which are social rented. A further 17% are private rented, with some 66% owner-occupied. (Source: 2011 Census)
40. Appendix 2 shows housing tenure as at the 2011 Census for each parish within the borough.
41. For clarity, the term '*affordable housing*' is as defined by the NPPF (Annex 2: Glossary):

**'Affordable housing:** housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.'
42. The NPPF (paragraph 62) clarifies that, where a need for affordable housing is identified, policies should specify the type of affordable housing required.
43. The PPG gives guidance in relation to calculating the need for affordable housing:
- Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:
- the number of homeless households;
  - the number of those in priority need who are currently housed in temporary accommodation;
  - the number of households in over-crowded housing;
  - the number of concealed households;
  - the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
  - the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.
44. Housing registers and local authority and registered social landlord transfer lists are seen as providing relevant information. In fact, the borough's Register is considered to be robust insofar as it categorises degrees of need. While it represents a tangible need, as opposed to a potential need, there is of course the prospect that households in need may not be on the Register (possibly due to being aware that they have little chance of being housed). Also, it does not consider future need – although the rate of additions to the Register may be a useful proxy.

45. The Council's SHMA, 2015 found that the borough would need **341**<sup>17</sup> affordable homes per annum to meet their housing needs and be eligible for affordable housing. This includes need arising from concealed and homeless households, as well as from overcrowded households, and those who seek an alternative tenure of accommodation, but would release a home for other households should a new affordable home be provided.
46. This estimate is sensitive to assumptions on spending on housing costs relative to income. It assumes 30%, but the figure falls by about a quarter if 35% is assumed, or about 50% if 40% rent to income ratio is assumed.<sup>18</sup>
47. A separate Housing Need Study, in 2018, assessed affordable requirements by taking into account the need from existing and newly-forming households within sub-areas of the borough of Tunbridge Wells, and comparing this with the supply of affordable housing. Against a gross need for affordable housing of 662 dwellings each year, when the likely annual affordable supply is taken into account, the overall net imbalance is **443** affordable dwellings each year.
48. This is considerably higher than the SHMA estimate of 341 dwellings, but includes significant numbers due to overcrowding, based on the bedroom standard. However, this may not represent actual demand in practice. Furthermore, this, and similar, needs due to unsuitable housing are assumed to be met within five years. There is also an error in the calculation in that the figure of 443 affordable dwellings per year includes meeting all the backlog within five years but then applies the resulting annualised need for the first five years over the longer period of 15 years that the Local Plan covers. The corrected affordable housing need over a 15-year period, based on the HNS estimate, is actually **391** dwellings/year<sup>19</sup>.
49. Both the above estimates are largely theoretical and assume that all need is met in an ideal form. The Housing Register, while only covering need that is presented to the Council as housing authority, is regarded as providing a baseline figure of effective need.
50. Most recent (June 2019) information from the Council's Housing team is that there are currently some **870** households on the Register. This figure has remained fairly constant over the last 3 years, although it is reported that the average time to be housed has increased somewhat.
51. The number of households housed over the last 3 years is shown below. The average is 333 households, of which some 79% are home seekers.

Lettings	2016/17	2017/18	2018/19
Home seekers	284	258	244
Transfers	88	59	67
<b>Total</b>	<b>372</b>	<b>317</b>	<b>311</b>

<sup>17</sup> SHMA, 2015 Table 39, p90

<sup>18</sup> SHMA, 2015 Figures from Table 40, p91

<sup>19</sup> O/s need (1,757) less supply (1,369) = 388. Met over 15 yrs (not 5 yrs) = 26pa (not 78pa). Add need arising (584pa) = 584+26 (not 584+78) = 610 (not 662) less Relets of 219pa = 610-219 (not 662 -219)= **391** (not 443)

52. In terms of the size of dwellings sought, the borough-wide split is:

1 bed	2 bed	3 bed	4 bed	Total
278	335	200	53	866
32%	39%	23%	6%	100%

53. However, the Housing Team advises that many single people on the Register often do not bid for one-bed properties (to which they are restricted) either for financial or needs reasons. Hence, in terms of the mix of affordable housing in new developments, a more appropriate overall mix would be:

1 bed	2 bed	3 bed	4 bed	Total
10-15%	50%	30%	5-10%	100%

54. This is closer to the HNS assessment of:

One/two bedroom general needs	Three or more bedroom general needs	Older person dwellings
45.4%	45.4%	9.2%

55. Households on the Register are understandably seeking properties in their locality in most cases. Preferences for location are well distributed across the borough. There is more of a focus (likely for younger people) on Royal Tunbridge Wells/Southborough, although western areas are likely to be less appropriate for people in the east of the borough and vice versa.
56. In conclusion, it is clear that there is a relatively high need for affordable housing, as evidenced by high house prices. While effective demand appears lower than estimated total need, it is evident from the potential need for some 341 affordable homes pa, relative to an overall need of 678 homes pa (i.e. almost exactly 50%) that, even with an expanding private rented sector (see below), a significant number of new homes will need to be affordable.
57. It follows that planning policies should look at options to maximise delivery, both in terms of the proportion of affordable housing sought and the thresholds applied, and to consider the most appropriate tenures to support those in greater housing need, subject to viability and housing mix considerations.

#### Types of affordable housing

58. The SHMA estimated the likely need for intermediate and rented (social and affordable rents) of affordable homes. Taking the gross numbers for affordable housing need and comparing this against the supply from relets of existing stock, the analysis suggests that **64.3% of housing could be either social or affordable rented** –with the remaining 35.7% being intermediate products.<sup>20</sup>

<sup>20</sup> SHMA ,2015 Table 42, p 96 (227/353)

59. The HNS also analysed the preference for rental (affordable/social rent) and intermediate (shared ownership) affordable housing. Analysis of tenure preferences for existing and newly-forming households suggests a more even tenure split of **52.2% social/affordable rented** and 47.8% intermediate tenure. However, this does vary considerably depending on which part of the borough is studied.
60. The SHMA tenure split may be given more weight, partly as it better reflects affordability and partly as a greater proportion of social rented homes prioritises those in greatest housing need.
61. Affordable housing needs over the plan period will be reviewed in advance of the submission version of the Local Plan, to have regard to more up-to-date affordability information and levels of identified need.

**(b) The need for private rented housing**

62. As noted above, a significant proportion of homes - about 17% of the total stock - are rented in the private sector.
63. The SHMA notes that the proportion of households living in the private rented sector has increased by 6% over the 2001-11 period (and home ownership correspondingly reduced) as households are being forced to rent longer. Also, looking ahead, there is further potential for institutional investment in 'Build-to-Rent' housing schemes.
64. Younger households (based on household reference persons aged under 35 years) are found to have a high reliance on the private rented sector, as are Black and Minority Ethnic (BME) groups.
65. Given that the housing options for young people may be more limited than for other groups, it will be important to monitor the accommodation quality – this will need to focus on the quality of shared accommodation and housing within the private rented sector.

**(c) The housing needs of older people**

66. The need to provide housing for older people is critical as the proportion of older people in the population is increasing. Drawing on ONS data, the SHMA noted that the population of the borough of Tunbridge Wells aged 65+ years is expected to increase by 40.7% from 22,600 in 2017 to 31,800 in 2033.
67. The latest ONS (2016-based) demographic projections forecast a total population increase of some 7,500 people (6.4%) over the plan period (2016-2036). However, this screens substantial increases in the number of people aged over 65 years and especially those over 85 years.

68. The table below shows both the absolute increase in the older population by age cohort over the plan period, as well as the percentage increase for each age cohort.

Population change of older people (figures in '000s)

	<b>2016</b>	<b>2036</b>	<b>Increase</b>	<b>% increase</b>
65 - 74	11.8	15.2	3.4	29%
75 - 84	6.7	10.2	3.5	52%
85+	3.5	6.8	3.3	94%

69. Overall, the proportion of the borough's population that is aged 65+ is likely to increase from 19.3 to over a quarter, 25.5%, of all people.
70. The NPPF, in its Glossary, defines older people for planning purposes as people over or approaching retirement age, ranging from active people to the very frail elderly, with diverse housing needs.
71. It follows that close attention should be given to the number, size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.
72. Supporting independent living can help to reduce costs to health and social services and providing more options for older people to move could also free up houses that are under-occupied.
73. The SHMA includes a detailed consideration of the housing needs of older people. It finds:
- Given that the number of older people is expected to increase in the future and that the number of single person households is expected to increase this would suggest (if occupancy patterns remain the same) that there will be a notable demand for affordable housing from the ageing population.
  - Given the ageing population and higher levels of disability and health problems amongst older people, it suggests that this would mean a need for 70 specialist (sheltered/extra care or similar age-specific housing) housing units per annum
  - It suggests a c60:40 split between market and affordable sectors in meeting this need
  - 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

74. The SHMA Update gives further specific consideration to the need for Registered Care bedspaces, defined in two categories:
- *Residential care*: Where a care homes is registered to provide residential (personal) care only, all beds are allocated to residential care.
  - *Nursing care*: Where a care home is registered to provide nursing care all beds are allocated to nursing care, although in practice not all residents might be in need of or receiving nursing care.
75. It presented an indication of the number of people aged 75 and over who are expected to be living in some form of institutional housing (within Class C2):

Potential Need for Residential Care Housing – 2014-based SNPP (+MYE)

Institutional population aged 75+ (2015)	897
Institutional population aged 75+ (2035)	1,646
Change in institutional population aged 75+	750
Per annum 'need' (2015-35)	37

76. The HNS showed that many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs.
77. The HNS asked whether adaptations were required by households. Those particularly mentioned by households aged 65+ years were generally related to mobility issues and included adaptations to bathrooms (14.6%), internal handrails (12.7%), external handrails (9.1%) and stair-lifts (9.4%).
78. In summary, planning to meet the housing needs of older people is a major, strategic challenge for the Local Plan. The number of older person households will increase far more than households overall. This will inevitably include providing more specialist housing. At the same time, the HNS clearly demonstrates the strong desire of many older people to continue to live in their current homes. It nonetheless seems likely that a proportion will need some assistance and/or adaptations. Hence, there is a strong argument for requiring new housing to be accessible and adaptable, especially for affordable homes.

**(d) The housing needs of people with disabilities**

79. The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in ensuring that they live safe and independent lives. People with disabilities are defined for planning purposes in the NPPF's Glossary. It includes people with a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.
80. Whilst available data sources can provide a good indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home.

81. Across the borough of Tunbridge Wells, the HNS identified that 30.8% of households contained at least one person with an illness/disability. The most frequently mentioned illnesses/disabilities were physical or mobility impairment, at 8.1% of all households, and longstanding illness or health condition, at 7.7%.
82. The HNS found that overall 5.3% of all properties across the borough have been adapted or purpose-built for a person with a long-term illness, health problem or disability. It noted that national data suggests that around 3.3% of households contain at least one wheelchair user.
83. In conclusion, the reports support provision of accessible and adaptable housing (M4(2), with specific provision being made for wheelchair accessible/adaptable (M4(3) homes of the order of 5% of total supply.

**(e) The housing needs of Gypsies, travellers and travelling showpeople**

84. Gypsies, travellers and travelling showpeople have specific needs unlike most of the population. These needs can be met through better use of existing sites, rejecting applications to reduce the number, or general provision of sites within the borough. Travelling showpeople often require larger plots of land, as they may need a substantial area to contain their equipment.
85. Gypsies, travellers and travelling show people are defined for planning purposes in the Government's Planning Policy for Traveller Sites' (PPTS).
86. A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2018. It is available to view on the Council's website.<sup>21</sup> The GTAA identified the existing supply of pitches within Tunbridge Wells borough as at July 2018 as:

Permanent Public Pitches	9
Permanent Private Pitches	45
Temporary Pitches (all private)	1
Unauthorised Pitches	0

87. It assessed needs over the period 2017-2037. Its summary of accommodation needs is split for different time periods, as below:

Period	Pitches required
2017-22	15
2022-27	5
2027-32	6
2032-37	6
<b>Total (20 years) 2017-37</b>	<b>32</b>

<sup>21</sup>

[http://www.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0010/184771/6C61B52DA81326C7E0531401A8C0A945\\_Gypsy\\_and-Traveller\\_Accommodation\\_Assessment\\_2018.pdf](http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0010/184771/6C61B52DA81326C7E0531401A8C0A945_Gypsy_and-Traveller_Accommodation_Assessment_2018.pdf)



88. These figures are based on households that have not permanently ceased to travel or have ceased to travel for health or family reasons. The need for those who currently travel is lower, at 24 pitches over the whole period. However, this latter figure is not regarded as fully meeting the NPPF definition of Gypsies and travellers in the PPTS.
89. Therefore, the Local Plan should make provision for **32 pitches**. (It is assumed that there is no material difference in need for the period 2016-2036 relative to that (2017-2037) covered by the GTAA.)
90. The GTAA goes on to consider how the identified need may be met. It recommends that the most appropriate way of meeting the identified need, which stems from the growth of existing families, should largely be through the intensification and/or expansion of existing sites. However, it cautions that for some sites this may not be appropriate, including where the expansion or intensification of a site may result in a site that is considered to be too large.
91. It advises that further capacity could also be met by granting full planning permission to occupiers residing on sites with temporary planning permission and also by reviewing appeal decisions.
92. It follows that the Local Plan should consider the scope for existing sites to accommodate additional pitches, supported by a criteria-based planning policy, and possibly supplemented by site allocations. The most suitable approach for each site will, of course, need to be informed by a full planning assessment of each site, as well as having regard to the future intentions of current occupiers.
93. Further consideration of the potential sources of supply of additional pitches will be given in the *Housing Supply Topic Paper*.
94. The GTAA noted that there were only a small number of unauthorised caravans in recent Caravan Counts, which may reflect an absence of transit site demand. Indeed, the more recent Caravan Counts, for January and July 2019, show only one unauthorised pitch at each count.
95. Given the low number of unauthorised encampments, combined with the fact that they tend to be seasonal, there appears little need for the provision of formal separate transit sites to be made in the Local Plan. However, further consideration may be given, working with local authorities and the police across the county, to agree potential 'negotiated stopping places' for small scale transient encampments. Such agreements may not require planning permission if they are in use for fewer than 28 days in a year.
96. In relation to travelling showpeople, as there are no known sites/plots in the area, nor any travelling showpeople who have registered an interest in moving into the area, no need for such plots is identified.

**(f) The need for self-build and custom housebuilding opportunities**

97. The NPPF<sup>22</sup> outlines that the housing need for self-build and custom housebuilding should be assessed and reflected in local planning policies (p.17, para. 61). It notes, at footnote 26 to this paragraph, that:

*“Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.”*

98. Within the Self-Build and Custom Housebuilding Act 2015<sup>23</sup>, self-build and custom builds are defined in terms of where an individual is, and/or an association of individuals (including bodies corporate that exercise functions on behalf of associations of individuals) are, seeking to acquire serviced plots of land in an authority's area in order to build houses for those individuals to occupy as homes (p.1). Serviced plots of land required to meet such need - and to be planned for by the local authority in planning policy - are defined as *“a plot of land which satisfies such requirements about utilities and other matters as may be specified”* (p.3).
99. As of 1st April 2016, Tunbridge Wells Borough Council, as the local planning authority, has a statutory responsibility to keep a Self-Build and Custom Housebuilding Register for the borough. The purpose of the register is to provide the Council with valuable information on the demand for self-build and custom housebuilding in the local area. This information forms a key part of the Council's evidence base of the demand for this type of housing.
100. For the Self-Build and Custom Housebuilding Register, there are general eligibility requirements for individuals/groups wishing to make a registration. Each individual applicant, and every member of an association, that applies to go on the Register must meet the following criteria:
- *Aged 18 or older;*
  - *A British citizen, a nation of an EEA State other than the United Kingdom, or a nation of Switzerland; and*
  - *Seeking (either alone or with others) to acquire a serviced plot of land in the relevant authority's area to build a house to occupy as that individual's sole or main residence.*

---

<sup>22</sup> National Planning Policy Framework (2019):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>23</sup> Self-Build and Custom Housebuilding Act 2015:

[http://www.legislation.gov.uk/ukpga/2015/17/pdfs/ukpga\\_20150017\\_en.pdf](http://www.legislation.gov.uk/ukpga/2015/17/pdfs/ukpga_20150017_en.pdf)

101. There have been three base periods since the introduction of the self-build and custom housebuilding register where applicants have registered a demand in the borough. The first base period covers 1<sup>st</sup> April 2016 to 30<sup>th</sup> October 2016, the second base period covers 31<sup>st</sup> October 2016 to 30<sup>th</sup> October 2017, and the third base period covers 31<sup>st</sup> October 2017 to 30<sup>th</sup> October 2018. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period. All subsequent base periods will therefore run from 31<sup>st</sup> October to 30<sup>th</sup> October each year.
102. At the end of each base period, a local planning authority has three years in which to permission an equivalent number of plots of land which are suitable for self-build and custom housebuilding as there are entries for that base period.
103. The following tables below provide an overview of the self-build and custom housebuilding need identified through registrations made to the Council's Register over the first three base periods:

**First Base Period (1 April 2016 to 30 October 2016)**

Number of individuals placed on the register between 1 April and 30 October 2016	32
Number of associations of individuals (groups) placed on the register between 1 April and 30 October 2016	1 group consisting of 6 individuals

**Second Base Period (31 October 2016 to 30 October 2017)**

Number of individuals placed on the register between 31 October 2016 and 30 October 2017	73
Number of associations of individuals (groups) placed on the register between 31 October 2016 and 30 October 2017	0

**Third Base Period (31 October 2017 to 30 October 2018)**

Number of individuals placed on the register between 31 October 2017 and 30 October 2018	52
Number of associations of individuals (groups) placed on the register between 31 October 2017 and 30 October 2018	0

104. Consequently, the total number of serviced plots required for self-build and custom housebuilding in the borough by 30<sup>th</sup> October 2021 is **163**.
105. The Register's information is complemented by that from the Housing Needs Study (2018)<sup>24</sup>, which identified that **193** households would be interested in self-build (p.91), based on a Household Survey.

<sup>24</sup> Borough of Tunbridge Wells Housing Needs Study 2018: Tunbridge Wells Borough Council: [http://www.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0019/132256/711D8F912E166417E0531401A8C086E8\\_Tunbridge\\_Wells\\_HNS\\_draftreport\\_May\\_2018V4.pdf](http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0019/132256/711D8F912E166417E0531401A8C086E8_Tunbridge_Wells_HNS_draftreport_May_2018V4.pdf)

106. The Survey identified that of the households considering self-build:
- 57.9% were either owner occupiers, with 42.1% living in private rented accommodation
  - 42.9% were younger couples, 30.5% were couples with children, 11.7% were student households, 9.8% were single and 5.0% were older couples
  - 6.0% were on incomes of under £450 per week; 35.8% were on incomes of between £450 and £750 per week; 32.3% earned between £750 and £950 per week and 26.2% earned over £950 per week, and
  - Mainly aspired towards three bedrooms (72.7%).
107. Both these sources show quite similar levels (163-193) of current interest in self-build and custom build housing in the borough. However, for the purpose of calculating need for the Local Plan, it is necessary to project the need across the Plan period to ensure that a sufficient and constant supply of self-build and custom housebuilding plots are provided to take into account the potential for additional registrations to the self-build Register each year/base period.
108. Given the relatively short period for which there is information from the self-build and custom housebuilding Register, it is difficult to predict future needs. Also, people can be on more than one Register and do not have to be local to an area, nor is there an obligation for those on the Register to remove their registration if their demand ceases for any reason. Therefore, the following estimates should be treated as indicative and provisional at this stage, and subject to review ahead of the next, pre-submission, version of the Local Plan.
109. As part of this process of refinement, the Council will consider the introduction of a “local connection test” as an eligibility criterion for entry on the self-build Register, as a means of clarifying the local need and, hence, likely greatest interest. To date, analysis of the Council’s Register (from the first three base periods) indicates that 63% of individuals on the Register are local to the area (i.e. are within the borough). The likely impact of this “test” on future need is considered below.
110. Drawing on the Register’s first three base periods:
- average demand (without a local connection test) = 5.26 dwellings/month
  - average demand (with a local connection test) = 3.31 dwellings/month<sup>25</sup>
111. Applying this average of need arising each month to the total number of years/months within which the need has to be met within the plan period (17 years x 12 months = 204 months), the projected self-build and custom housebuilding need equates to:
- 1,073 plots (without a local connection test)
  - **675 plots** (with a local connection test)

---

<sup>25</sup> Based on 5.26 overall monthly demand x 63% which is local

112. The local connection test-based figure is regarded as more appropriate going forward, although to take into account the above difficulties in calculating an accurate figure for this need, and to ensure that the need is not underestimated, it may be appropriate to round up this figure to 700 (as a minimum).
113. Therefore, the provisional target is to provide some **700** serviced plots for self-build and custom housebuilding through the Local Plan.
114. It is also noted that as most of the evident demand is for individual plots, the approach to meeting need should include a supportive approach to single dwelling schemes. This may be addressed through positive development management policies towards suitable small windfall schemes, aside from any complementary provision as part of larger housing developments.

**(g) The need for a proportion of smaller housing sites**

115. The NPPF requires local plans to promote small and medium sizes sites as a means of meeting the housing requirement of an area to ease over-reliance on large sites that often take time for delivery to start. As such, local planning authorities should aim to:

*“identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;”* (para. 68).

116. To calculate this target for the statistical base date of the Local Plan, of 1<sup>st</sup> April 2019, the number of completions from 1<sup>st</sup> April 2016 (1,552) is deducted from the overall housing target (13,560), then divided by 10 to get the 10% minimum figure.
117. On this basis, the Local Plan should therefore identify land for at least **1,201** dwellings on sites of no more than one hectare.
118. This will consequently be addressed in the Housing Supply Topic Paper as a particular housing need that the Local Plan should account for and accommodate.

## Summary of particular housing needs

119. Part 1 of this Paper finds that the overall housing need for the borough that the Local Plan should, as a minimum, aim to meet is 678 dwellings/year. In meeting this need, the NPPF also expects plans to meet the needs of particular groups, as reviewed above. In summary, the needs identified for these groups are:

a) Affordable housing

It is evident that the borough has, and will have, a high need for affordable housing, both in absolute terms and relative to overall housing need, such that the Local Plan should look to maximise the supply of affordable homes.

To help meet this need will involve both setting a relatively high affordable housing requirement – 40% on greenfield sites and 30% on brownfield sites is recommended – and by having a low threshold in terms of the size of developments the requirement applies to. While the NPPF sets a general minimum threshold of 10 dwellings (and 6 dwellings in AONBs), it is considered that the Local Plan look at seeking contributions towards affordable housing from smaller schemes.

The analysis suggests that the greater proportion of affordable homes, probably in the order of 55-60%, should be either social or affordable rented, with the remaining proportion being intermediate products.<sup>26</sup> In fact, in order to prioritise meeting the greatest housing needs, the greater proportion should be social rented homes.

b) Private rented housing

It is found that private rented housing forms an increasing component of the housing stock. However, no targets are set. Rather, the attention is on monitoring accommodation quality, particularly of shared accommodation.

c) Housing for older people

With an ageing population, meeting the housing needs of older people will require providing more specialist housing, as well as ensuring that dwellings are, as far as practicable, capable of meeting changing needs over time. Hence, it identifies a strong argument for requiring new housing to be accessible and adaptable, especially for affordable homes.

d) Housing for people with disabilities

The analysis supports provision of accessible and adaptable housing (M4(2), with specific provision being made for wheelchair accessible/adaptable (M4(3) homes of the order of 5% of total supply.

e) Gypsies, travellers and travelling showpeople

There is an estimated need for a further 32 permanent pitches over the plan period. It is recommended that this be, and may be, predominantly met through the intensification and/or expansion of existing sites, supported by a criteria-based policy.

---

<sup>26</sup> SHMA ,2015 Table 42, p 96 (227/353)

No need for a designated transit site, or unmet need for plots for travelling showpeople, is identified.

f) Custom and self-build housing

Information on needs is rather limited, so a provisional target is put forward, being some 700 serviced plots for self-build and custom housebuilding over the remaining Local Plan period. At the same time, as most of the evident demand is for individual plots, the approach to meeting need should involve a supportive approach to suitable small schemes, with complementary provision as part of larger housing developments.

g) Smaller housing sites

The report identifies the minimum number of dwellings (being 1,201) that the Local Plan should identify on sites of less than one hectare to meet the NPPF requirement for at least 10% of the housing requirement being met be smaller sites.

120. Finally, it is highlighted that housing needs over the plan period will be reviewed in advance of the submission version of the Local Plan, to have regard to any more up-to-date information and levels of identified need.

## **APPENDICES**



## Appendix 1: Application of the ‘Standard Method’ to assessing the housing need for Tunbridge Wells Borough)

(NB Guidance on the steps to be followed, as set out in the Planning Practice Guidance on ‘Housing and economic needs assessment’, is reproduced in blue below.)

### Step 1 - Setting the baseline

Set the baseline using national [household growth projections](#), (2014-based household projections in England, [table 406](#) unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that, the figures displayed are rounded and individual cells need to be viewed in order to see the full number.

Figures for Tunbridge Wells in the Live Tables over the period up to 2036 are:

	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
Tunbridge Wells	50,942	51,450	51,926	52,410	52,897	53,404	53,882	54,364	54,847	55,329	55,814	56,293	56,761	57,211	57,661	58,116	58,570	59,039

It can be seen that the projected average annual household growth over 10 years beginning with the current year (2019) is 487 dwellings per year<sup>27</sup>. However, the Guidance advises that the figure should be kept under review and revised where appropriate. Moreover, it adds that the figure applicable at the time of submission may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.<sup>28</sup> Therefore, it is sensible to use this figure (i.e. taking the 2020-2030 period) for the calculation for the Local Plan’s housing need at this stage.

On this basis, for the 10 years period 2020 -2030, the baseline calculation is  $56,293 (2030) - 51,450 (2020) = 4,843/10 = 484$  dwellings per year.

<sup>27</sup>  $55,814 (2029) - 50,942 (2019) = 4,872/10 \text{ years} = 487 \text{ pa}$

<sup>28</sup> PPG Paragraph: 008 Reference ID: 2a-008-20190220

## Step 2 - An adjustment to take account of affordability

Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area.

The most recent [median workplace-based affordability ratios](#), published by the Office for National Statistics at a local authority level, should be used.

No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4, the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

For Tunbridge Wells, the adjustment factor in Table 5c (using the 2018 affordability ratio) is  $(12.76-4)/4 \times 0.25 + 1 = 1.5475$

The full formula would be adjustment factor multiplied by the baseline figure, i.e.

$$1.5475 \times 484 = \mathbf{749 \text{ dwellings per year}}$$

**Step 3 - Capping the level of any increase**

A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

Where these policies were adopted within the last five years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

This also applies where the relevant strategic policies have been reviewed by the authority within the five year period and found to not require updating.

For areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy. For example, where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure in the spatial development strategy should be used

Where the relevant strategic policies for housing were adopted more than five years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10-year period identified in step 1; or
- b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

The last paragraph is relevant to Tunbridge Wells.

- a. The figure from step 1 is 484
- b. The average annual housing requirement in the Core Strategy was 300.

As the larger of the two figures is 484, the annual requirement is 484 + the 40% cap, which is **678**.

As the capped figure of 678 is lower than the uncapped figure of 749 under the Standard Method, **the minimum number of homes expected to be planned for in a way which addresses projected household growth and historic under-supply in the new Local Plan for Tunbridge Wells borough is expected to be 678 dwellings per year.**

### Housing delivery test.

To calculate the total net homes required over the three-year period the calculations draw on:

- Annual average household growth over a ten year period.  
This is calculated for each of the test years by authority based on household projections.  
The household projections used for each test year are: 2012-based in 2015/16; 2012-based in 2016/17; and, 2014-based in 2017/18;

For Tunbridge Wells, this is –

2015/16	549 (pro rata'd with 3 months from the core strategy)
2016/17	612
2017/18	494
2018/19	487
2019/20	484

The first three years numbers can be found below.

<https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

The homes delivered can be found through the same link, and are calculated by the individual Local Authorities, based on how many units have been delivered, with a separate calculation for communal accommodation and student accommodation.

- Local plan information; both the most recent local plan and the previous local plan.  
Only local plans which set out an authority's housing requirement are used. Data collected includes: the adoption date, start date, end date, housing requirements including trajectories, joint plan requirements, traveller requirements, and any unmet need which has been given to or taken from other authorities; and,

## Housing Needs Assessment Topic Paper for Draft Local Plan – Regulation 18 Consultation

For every local planning authority, the steps below were taken:

1. For every local authority annual average household growth over ten years is calculated based on the household projections available as at 1st April in each test year.
2. In some cases annual average household growth may be negative for one or more of the years being tested. In these instances, all three years of the household growth including negative values are summed. If the three-year summed result is a negative value, this is set to zero. If the sum of the three years of annual household growth is positive (despite one or more negative years), the figure is not changed.
3. Net unmet need is calculated for each authority by summing all the need taken (the authority becomes responsible for delivering this housing) and taking away all need given (the authority is no longer responsible for this housing).
4. To convert this into an annual figure, the number of years the plan covers is calculated by taking the difference between the start date of the plan and the end date of the plan; classifying both the start date and end date as days the plan covers. The total net unmet need figure by authority is then divided by the total plan period.
5. The annual net unmet need for each authority is then added to the annual average household growth for each test year.

In addition to steps 1 to 5, for an authority with an 'up to date' local plan which expired during the Housing Delivery Test period the steps below were taken:

1. The housing requirement is based on the annual target from the most recent plan for each year. If the local plan includes a stepped requirement then the annual target from the requirement corresponding to the relevant period is used, and the steps below are applied in the same way.
2. If the plan becomes out of date then from this point onwards the housing requirement is based on annual average household growth plus unmet need.
3. If the plan becomes out of date midway through a year, a weighted average for that year is calculated. This means that for as many days that the plan was 'up to date' within a test year, the annual target is used. For the remainder of the year, annual average household growth plus unmet need is used.
4. The number of homes required each year over the three-year period is based on the lower of the housing requirement or household growth plus unmet need in each year.
5. In this instance, the housing requirement in a given test year could be: a. The target from the plan (if the plan is 'up to date' for the full year); b. A weighted average of the target from the plan and annual average household growth plus unmet need (if the plan is only 'up to date' for part of the year); or, c. Household growth plus unmet need (if the plan is out of date for the full year).

## Housing Needs Assessment Topic Paper for Draft Local Plan – Regulation 18 Consultation

6. For each individual year that the annual target is greater than annual average household growth plus unmet need, the lower figure is used.
7. The final number of homes required sums each year's lower figure to calculate the three-year total number of homes required.
8. Similarly to the above, if an authority adopts a plan which covers the latter part of the Housing Delivery Test period then prior to the period the plan covers, annual average household growth plus unmet need is used. From the point following the plan start date, the housing target from this is used (using the relevant stepped requirement where appropriate). The "lower of" policy is applied in the same way, comparing the housing requirement in each year to annual average household growth plus net unmet need.

The housing requirement for travellers: In addition to steps 1 to 5 and the relevant process depending on local plan status, where applicable the requirement for traveller accommodation are added to the housing requirement. This addition takes place prior to the application of the "lower of" policy which compares the housing requirement (containing the travellers housing requirement) and the annual average household growth plus net unmet need, choosing the lower for each year as the number of homes required for that year. The travellers housing requirement is calculated through the steps below:

1. The travellers accommodation requirement is based on the travellers annual target from the most recent plan for each year. If the local plan contains no travellers requirement then no adjustment is made.
2. Where there is a travellers requirement and the plan becomes not 'up to date' then from this point onwards the travellers adjustment is no longer made.
3. If the plan becomes not 'up to date' midway through a year, then for as many days that the plan was 'up to date' within a test year, the travellers annual target is used (apportioned based on how many days this was 'up to date'). For the remainder of the year, no travellers housing requirement is added.
4. If the local plan includes a stepped requirement for the travellers requirement, then the annual target from the requirement corresponding to the relevant period is used, and the steps above are applied in the same way.

**Appendix 2: Housing tenure by parish (2011 Census)**

	Number of Households	Owned (Outright or Mortgage)	Shared Ownership (Part Owned and Part Rented)	Social Rented	Private Rented	Living Rent-Free
Benenden and Cranbrook	2917	1842	43	547	377	108
Brenchley and Horsmonden	2036	1571	6	192	231	36
Broadwater	1963	1146	10	505	284	18
Capel	918	638	4	130	129	17
Culverden	4081	2198	66	159	1628	30
Frittenden and Sissinghurst	847	627	4	92	94	30
Goudhurst and Lamberhurst	1854	1229	7	264	307	47
Hawkhurst and Sandhurst	2580	1825	11	371	330	43
Paddock Wood East	1771	1244	7	247	253	20
Paddock Wood West	1509	1157	14	254	74	10
Pantiles and St Mark's	2991	2101	9	182	671	28
Park	3327	2282	18	284	699	44
Pembury	2400	1778	9	387	198	28
Rusthall	2076	1280	11	515	246	24
St James'	2844	1476	33	497	819	19
St John's	2864	1988	42	262	544	28
Sherwood	3001	1573	27	1101	275	25
Southborough and High Brooms	3111	1894	45	704	441	27
Southborough North	1781	1273	7	291	183	27
Speldhurst and Bidborough	2303	1877	3	164	212	47
<b>Borough as a Whole</b>	47174	30999	376	7148	7995	656
<b>Borough as a Whole (%)</b>	100%	65.71%	0.80%	15.15%	16.95%	1.39%

**If you require this document in another format, please contact:**

**Planning Policy Planning Services  
Tunbridge Wells Borough Council Town  
Hall Royal Tunbridge Wells Kent TN1 1RS**

**Tel: 01892 554056**

**Email: [localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk)**