

PLANNING STATEMENT



78C High Street,

Tonbridge

May 2021



McCarthy & Stone are widely recognised as the market leader in the provision of retirement housing and extra care accommodation for the older section of society. To date, more than 56,000 specialised dwellings for the elderly have been built or are in the course of construction at over 1,200 McCarthy & Stone development sites throughout the United Kingdom. McCarthy & Stone schemes consist of 1 and 2 bedroom apartments or bungalows within a single development with accompanying communal facilities such as residents lounge, laundry room, refuse room, guest suite and house a manager's office.

McCarthy & Stone have over 40 years' experience in providing independent apartments that are a serious alternative to remaining in the family home or moving into residential care.

The Planning Bureau Ltd. are the retained planning and architectural consultancy for McCarthy and Stone.

This Planning Statement has been produced by Ian Hann, Planner, with The Planning Bureau Ltd.



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Appendices

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Appendix C: *'Creating Housing Choices for an Ageing Population'* by Shelter

Appendix D: *'A Better Life: Private Sheltered Housing and Independent Living for Older People'* by The Opinion Research Business

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Appendix F: *'Local area economic impact assessment Report', March 2014 (Unpublished)* by Institute of Public Care

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Appendix I: *'Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing'* by WPI Strategy and Homes for Later Living

EXECUTIVE SUMMARY

Proposal

- The application proposes 36 Retirement Living apartments for older persons, with associated communal facilities, parking and landscaping.
- In accordance with the National Planning Policy Framework (NPPF) (Paras 39-42) the applicant has actively sought to engage in pre-application discussions with the local planning authority, local community and, where relevant, statutory consultees (please see Statement of Community Involvement).

Need for Older Persons Accommodation

- National Planning Practice Guidance has identified that the need to provide housing for older people is ‘**critical**’ given the projected increase in the number of households age 65 and over accounts for over half of all new households.
- Paragraph 61 of the NPPF advises that local planning authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community, including older people.
- There is an increasing older population in Tonbridge and Mailling with the 65-69 age group increasing by 41.6% by 2031, the 70-74 population increasing by 48.7%, the 75-79 population increasing by 40.5%, the 80-84 population increasing by 80.% and the 85 plus age group increasing by 90.7% over the same time.

Planning Policy

The proposed development complies with national planning policy and policies of the local development plan in the following way:

- The proposed scheme delivers on all three dimensions of sustainable development (economic, social and environmental) as set out by Para 8 of the NPPF.
- The site is positioned in a sustainable location within an existing settlement and is in line with the policies of the Core Strategy and Local Plan.
- The proposal for a total of 36 units of specialised accommodation will count towards the Council’s overall housing supply, where they are currently unable to demonstrate a 5 year housing land supply.
- The proposal is a high-quality scheme drawing upon the vernacular character of the area and wider area of Tonbridge, and as such complies with the aims and objectives of the NPPF and local planning policy to produce high quality design.

Material Planning Benefits

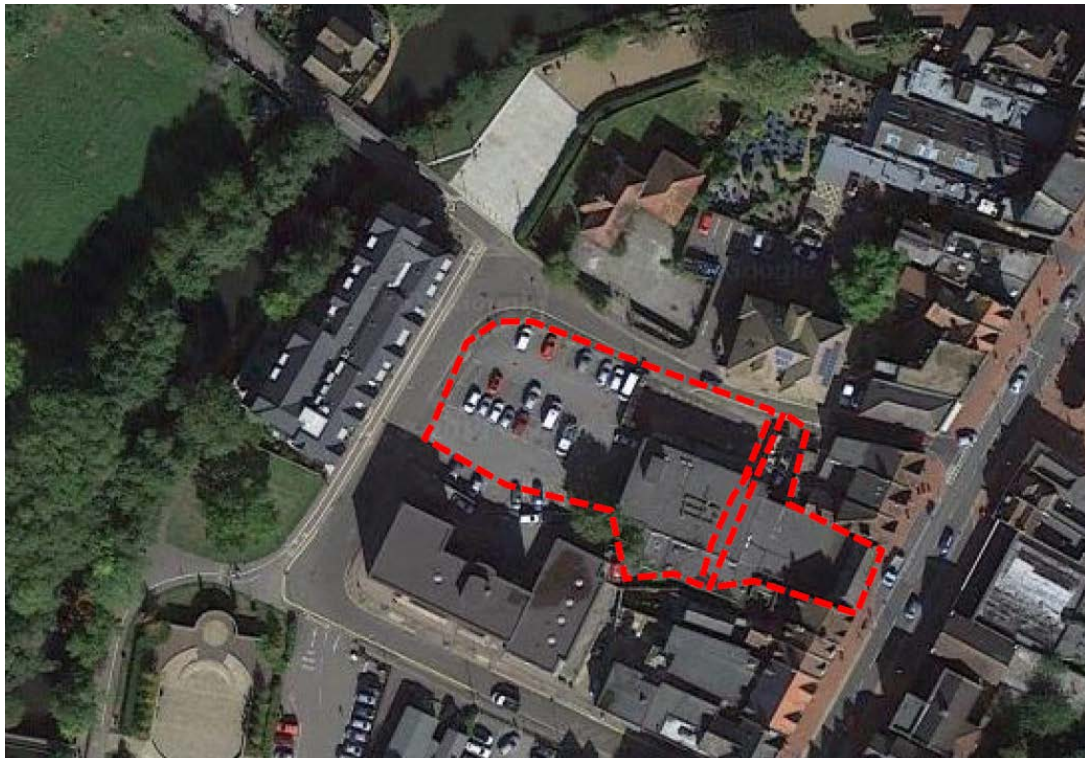
- Older Persons housing has significant economic benefits as residents rely on local shops and services for their everyday needs.
- Older Persons housing has significant social benefits for residents in terms health and well-being which reduces pressures on local health care facilities, and for many can provide companionship in later life. This brings very significant savings to the NHS and other care agencies.
- Specialised forms of residential accommodation for older persons also has the benefit of freeing up under occupied family housing in the local area by providing housing choice for the entire community.

1 Proposed Development

- 1.1 This application seeks the redevelopment of the Site to form a 4 storey building comprising of 36 Retirement Living units within the rear portion of the site, located on the existing car park. A separate application is proposed to run in parallel, relating to partial demolition, conversion and extension of the existing building to form 6 residential units; retention of commercial use at ground floor (Use Class E) and façade upgrades to the High Street frontage. Separate red line boundaries are proposed because the Sites will be owned and built out by separate commercial entities following the grant of planning permission. This approach enables a distinction between land parcels for the purpose of imposing planning conditions and obligations. Enabling works, including the partial demolition of the existing building will be carried out by Tonbridge 19 Ltd. Full details of the application are contained within the Design and Access Statement, which accompanies this application.

Site Description

- 1.2 The Site is located on the western edge of Tonbridge Town Centre and comprises a retail building fronting the High Street (currently vacant) and a large rear car park. Retail and other commercial uses occupy the buildings on the High Street to the east of the site and development to the rear of the High Street are a mix of commercial and residential buildings of varying scales, design and ages. The River Medway is located to the north west of the Site, beyond which is Tonbridge Castle, a Scheduled Ancient Monument. The aerial image below shows the Site's location.



- 1.3 The site lies in a highly sustainable location, with good pedestrian and public transport links to the amenities and services in the Tonbridge High Street, as well as local leisure and community facilities. The site offers an opportunity to redevelop the land with sensitively designed retirement accommodation, exclusively for over 60s.
- 1.4 In selecting sites for elderly persons' accommodation, full account of the location criteria recommended in the joint Advisory Note of the National House Builders' Federation and the National Housing and Town Planning Council entitled "Sheltered Housing for Sale" (2nd Edition - 1988) are considered.
- 1.5 The five location criteria identified are:-
- (i) Topography
 - (ii) Environment (including safety and security)
 - (iii) Mobility
 - (iv) Services
 - (v) Community Facilities
- 1.6 The NHBF/NHTPC Advisory Note acknowledges that the ideal site for retirement housing is difficult to find. However, the site that is the subject of this application is eminently suited to an older persons housing use and is well situated to serve the needs of the local elderly person who will occupy such a development.



2 Nature and Concept of Retirement Living Housing

- 2.1 Later Living retirement housing is a proven option for older people who wish to move into accommodation that provides comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living in the community and out of institutions whilst enjoying peace of mind and receiving the care and support that they need..
- 2.2 Later Living developments, as proposed here, are designed for the more independent older person with development of one and two bedroom apartments around a central core of communal facilities. The communal facilities typically include residents lounge, refuse room, mobility scooter store and house managers office. All apartments have level access and careline facilities, whilst all floors are accessed by lift. The developments are supervised by a house manager and occupation of the apartments is controlled through the lease.



- 2.3 Since 2010 McCarthy and Stone now manage their own developments and a House Manager is based on-site, supported by the company's management services team. This allows for the maintenance and management of the development and its grounds in line with best practice and all legal lease management requirements that apply.
- 2.4 While anyone may purchase an apartment, the apartments are sold on the basis of a 999 year lease requiring the accommodation, with the exception of the house manager's office accommodation, to be occupied by persons over 60 years. In the case of a couple, that part of the lease shall be satisfied where one of the occupants is over the age of 60 years and the other is over the age of 55 years.
- 2.5 This is a reasonable and caring approach to the limitation on the occupancy of retirement living housing in that it recognises and allows for those exceptional cases where a spouse, who is in need of special accommodation, may have a younger partner. This can be controlled via planning conditions should the Local Planning Authority consider that there is a need for it to be controlled further.
- 2.6 Such occurrences are, in any event, found to be extremely rare as between 70-80% of occupants are aged 78 years or over with about 30% aged 80 years or over. The vast majority of McCarthy & Stone residents (some 85-90%) are widowed or single, with 75% of apartments comprising single, female households.

3 Need for Specialist Accommodation of Older People

- 3.1 The proposed redevelopment of the site for housing for older people is a significant opportunity to contribute towards meeting the current and projected need for special needs housing for the older people within Tonbridge and Malling, Kent and in the UK generally.

National Need

- 3.2 A House of Lords select committee considered the implications of demographic reform. The Committee's considerations included the following projections:
- There would be 51% more people aged 65 and over in England in 2030 than there were in 2010.
 - There would be 101% more people aged 85 and over in England in 2030 than there were in 2010.
 - The 85 and over cohort are increasing in number more rapidly than other segments of the population. 69% of over 85s currently have a long-term illness or disability compared with 34% of 65 to 74s. The ageing of the population will need housing provision that meets their needs and may well include care and support services.
- 3.3 In May 2011, Professor Michael Ball of Reading University produced his report entitled 'Housing Markets and Independence in Old Age: Expanding the Opportunities'. The report provides an analysis of why in this country we face a shortfall in housing for older people and what we can do about providing more private sector housing for older people. The Executive Summary of his report is attached in Appendix A.
- 3.4 In summary, the report identifies that there are currently only 105,000 private sector (owner occupied) units of retirement housing in the UK, which is about 2% of the total number of homes for those aged 65 and over. The report identifies that this form of housing has benefits for residents, their families, local communities, the public sector and society in general, but the provision of this accommodation is being constrained by restrictive planning and housing policies.
- 3.5 The report statistically identifies that the need for this form of accommodation is set to increase with the changing demographics of the UK. By 2033, there is expected to be an additional 3.5 million older households in England alone, which is a 60% increase on today's levels. In respect to supply, the report states:

"Build rates are low and need to grow four times from that achieved even before the 2007/8 downturn to cope with just a moderate increase in demand. Forecasts in the research show a potential increase in the use of this accommodation from 2% currently to 5% of housing for those aged over 65 and over the next decade or so. This would generate a build rate of 16,000 OORH units a year, compared to just 4,400 in 2007."



3.6 In September 2013, Demos published its report “The Top of the Ladder” which looked at what it described as the ‘next housing crisis’ - the chronic undersupply of appropriate housing for older people. The report identifies that those at the top of the housing ladder are often trapped in homes that are too big and unmanageable, pointing to a lack of housing choice of suitable homes for older persons to downsize into is having not only a negative effect on older people’s health and wellbeing but also on the rest of the housing chain. The report identified the housing and socio-economic benefits of specialist retirement accommodation which had been identified by a number of reports, such as ‘Lifetime Homes, Lifetime Neighbourhoods’, and also the lack of progress in implementing the proposals of such reports. The report suggests that if just half of those interested in downsizing were able to do so, 4 million older people would be able to move freeing up 3.5 million homes. A copy of the executive summary has been appended to this report at Appendix B.

3.7 Almost simultaneously to the publication of the Demos Report the DCLG published revised national planning guidance online, in which it states;

“Housing for older people

The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size of dwellings needed in the future in order to free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should be used. The future need for older persons housing broken down by tenure and type e.g. sheltered, enhanced sheltered, extra care and registered care can be obtained from a number of online tool kits provided by the sector.”

3.8 It is clear from the terminology used that the issue of housing for older persons is recognised by the Government as of an importance where its delivery is ‘critical’ and that local planning authorities should be actively looking to plan to ensure the delivery of both public and private sector forms of older persons accommodation. Accordingly, the delivery of such housing can be considered a material planning benefit and the use of the word ‘critical’ in the planning guidance, I would suggest, allows significant weight to be attached to the proposed scheme, especially as no other housing type has its delivery described in such urgent terms.

3.9 A further report was published by the DCLG committee entitled ‘Housing for Older People’ on the 5th February 2018. It highlighted the lack of suitable housing for the older generation and called on Government to come together and improve policies affecting this area, making the following recommendations:

- More specialist retirement housing should be built to address a shortfall of supply, estimated to be around 15,000 to 25,000 units each year.
- Recognition that retirement housing promotes the health and wellbeing of older people, leading to savings in spending on health and social care, and for this to be addressed in the forthcoming social care green paper.
- The National Planning Policy Framework should be amended to emphasise the key importance of the provision of housing for older people and the new standard approach to assessing need should explicitly address the housing needs of older people.
- To facilitate the delivery of new homes, specialist housing should be designated as a sub-category of the C2 planning classification or be assigned a new use class.

- Councils should publish a strategy explaining how they intend to meet the housing needs of older people in their area and, in their Local Plans, identify a target proportion of new housing to be developed for older people along with suitable, well-connected sites for it.

3.10 The summary to the report concluded;

“National and local planning policy should give greater encouragement to the development of housing for older people. Older people who wish to move should be able to choose from a wide range of housing to accommodate their needs and preferences. However, the evidence we heard suggested there was shortage of desirable mainstream, accessible and specialist housing and bungalows in both the private and social sectors.”

3.11 A recent report from WPI Strategy and Homes for Later living, which was released in September 2019 includes new analysis, conducted by a former Treasury economist, that finds:

- People living in homes for later living typically experience reduced health risks, contributing to fiscal savings to the NHS and social care services of c. £3,500 per person per year;
- Building 30,000 more retirement dwellings every year for the next 10 years could generate fiscal savings across the NHS and social services worth £2.1bn per year;
- Using established national well-being criteria for happiness and life satisfaction, an average person aged 80 feels as good as someone aged 10 years younger after moving from mainstream housing to housing specially designed for later living.

3.12 A copy of this report is appended to this report as appendix G.

3.13 In addition, we consider the following reports to be of particular relevance and an executive summary for each is appended to this document:

- ‘Creating Housing Choices for an Ageing Populations’; By Shelter (Appendix C)
- ‘A Better Life: Private Sheltered Housing and Independent Living for Older People’ by The Opinion Research Business’ (ORB) (Appendix D); and
- ‘Identifying the Health Gain from Retirement Housing’ by the Institute of Public Care (Appendix E)

3.14 These reports detail that retirement housing provides a valuable form of specialised accommodation meeting a specific housing need. In doing so, it gives rise to significant planning and social benefits that realise other planning objectives given national and regional priority. The following table highlights some of the benefits of retirement housing:



3.15 Summary:

- Government recognises dramatic increase in the older population in the next 20 years.
- National Planning Policy Guidance identifies the need to provide housing for older people as 'critical'.
- National Planning Policy Framework requires Local Planning Authorities to plan their housing supply based on current and future trends including meeting the needs of different groups in the community such as older people.
- Current levels of private sector older persons housing only makes up 2% of the total number of homes for those aged 65 and over.
- Specialist older persons' accommodation assists in recycling the local housing market by releasing family homes back on to the market.
- Specialist older persons' accommodation has economic benefits to the local economy with residents utilising local shops for their everyday needs.
- Specialist older persons' accommodation has social benefits in respect to allowing older people to continue to live within their own community, and health and welfare benefits of living in accommodation designed for their needs thus reducing risk of injury or mobility issues.
- Specialist older persons' accommodation has environmental benefits in respect to energy bills and reduced transport costs.

Local Need

- 3.16 A Housing Needs for Older People Assessment has been compiled by Frank Farr and has been submitted along with this application. This report clearly sets out the need for older persons housing in the area and how there has been an under supply of 1,405 private seniors housing units resulting in an urgent need.
- 3.17 The following is an assessment of need for older persons housing as set out in the Council documents which have been produced for policy making and review purposes.
- 3.18 The Housing need update which was produced by GL Hearn and published in January 2019 shows that the 60+ is expected to grow at a steady increase to 2031, with the biggest growth in the 80-84 and 85+ age groups. It is especially notable that the over 60 population is expected to grow at a much increased rate than that in the younger age ranges which clearly shows how Tonbridge and Malling have an aging population that will require additional specialist housing to meet their needs.

Table 4: Population Change 2011 to 2031 by five-year age bands – Tonbridge and Malling

Age group	Population 2011	Population 2031	Change in population	% change from 2011
Under 5	7,453	7,783	330	4.4%
5-9	7,712	8,624	912	11.8%
10-14	8,124	9,254	1,130	13.9%
15-19	8,187	8,980	793	9.7%
20-24	5,824	6,071	247	4.2%
25-29	5,824	6,111	287	4.9%
30-34	6,587	6,903	316	4.8%
35-39	8,356	8,646	290	3.5%
40-44	9,849	9,793	-56	-0.6%
45-49	9,671	9,587	-84	-0.9%
50-54	8,361	9,266	905	10.8%
55-59	6,975	9,124	2,149	30.8%
60-64	7,482	9,465	1,983	26.5%
65-69	6,286	8,900	2,614	41.6%
70-74	4,908	7,297	2,389	48.7%
75-79	4,085	5,740	1,655	40.5%
80-84	2,921	5,257	2,336	80.0%
85+	2,482	4,732	2,250	90.7%
Total	121,087	141,634	20,447	16.9%

Source: ONS

- 3.19 The Tonbridge and Malling Strategic Housing Market Assessment (SHMA) was published in March 2014 and forms the basis of the evidence base for ongoing Local Plan work. The first item of note is how 22% of households were comprised entirely of people aged 65 and over, which while being slightly lower than the County average is still slightly above the equivalent figure for England.:

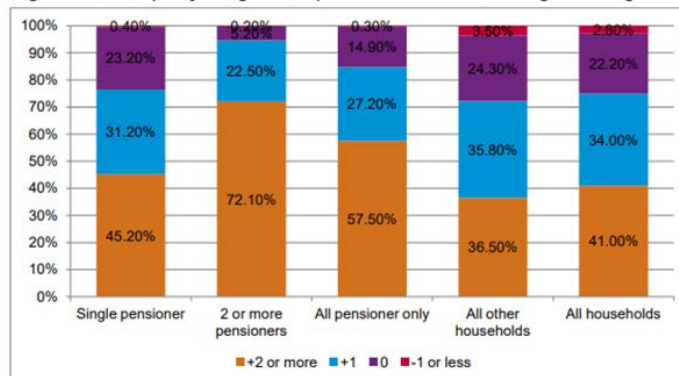
Table 56: Pensioner households (Census 2011)

Pensioner households	Tonbridge & Malling	Kent	South East	England
Single pensioner	5,635	79,310	449,969	2,725,596
2 or more pensioners	4,924	58,524	329,263	1,851,180
All households	48,140	605,638	3,555,463	22,063,368
Single pensioner	11.7%	13.1%	12.7%	12.4%
2 or more pensioners	10.2%	9.7%	9.3%	8.4%
All households	100.0%	100.0%	100.0%	100.0%
Total % pensioner only	21.9%	22.8%	21.9%	20.7%

Source: Census (2011)

- 3.20 The research goes further to show that older person households are more likely to under-occupy their housing more than other households in the borough. In total 58% have an occupancy rating of +2 or more (meaning there are at least two more bedrooms than are technically required by the household). This is significantly above the corresponding figure for non-pensioner households (37%). Further analysis suggests that under-occupancy is far more common in households with two or more pensioners than single pensioner households.

Figure 52: Occupancy rating of older person households - Tonbridge & Malling



Source: 2011 Census

- 3.21 This clearly demonstrates that the population of Tonbridge and Malling is growing older which also means that the households will also be older. This will unfortunately also necessitate an increase in people suffering from health issues with 76% of people suffering from mobility problems to 2031.

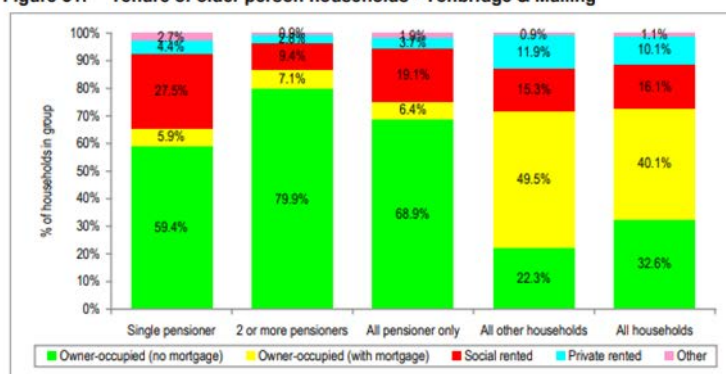
Table 58: Estimated population change for range of health issues (2011 to 2031)

Type of illness/disability	2011	2031	Change	% increase
Dementia	1,388	2,682	1,294	93.3%
Mobility problems	3,698	6,508	2,810	76.0%

Source: Data from POPPI and demographic projections

- 3.22 With this clear evidence that there is a local older growing population which are under occupying their homes. The strategy further states that 69% of pensioners are owner occupiers which is a clear indication that there with a large amount of older people in Tonbridge and Malling who own their own homes they would be in a position to downsize, should the appropriate accommodation be provided to suit their needs.

Figure 51: Tenure of older person households - Tonbridge & Malling



Source: 2011 Census

However while there may be a desire to down size there is lack of suitable accommodation for them to move into with there being a need for 726 units of sheltered housing (as proposed through this application).

Table 59: Estimated Need for Specialist Housing

	Current need	Additional need (to 2030)	Total need
Sheltered – affordable	277	546	823
Sheltered – market	243	483	726
Extra care – affordable	193	177	370
Extra care – market	0	0	0
Registered care	701	781	1,482
TOTAL	1,414	1,987	3,401

Source: Housing LIN

4 Planning Policy Considerations

- 4.1 In assessing the acceptability of the proposal in planning terms, it is appropriate to review national, strategic and local planning considerations insofar as they give guidance as to the nature and extent of the development that is appropriate for the site. I briefly highlight some salient points of the national planning policy framework and planning guidance.

NATIONAL POLICY

National Planning Policy Framework (NPPF)

- 4.2 The National Planning Policy Framework was originally published on the 27th March 2012 and was republished following a review in July 2018 and February 2019. This document sets out the Government's objectives for the planning system, and places "sustainability" at the forefront of national planning policy.

Sustainable Development

- 4.3 Paragraph 7 explains that: "the purpose of the planning system is to contribute to the achievement of sustainable development." Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development.
- 4.4 The NPPF goes on to emphasise that Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development and sets out a criteria by which such proposals should be considered.
- 4.5 The NPPF requires the planning system to deliver sustainable development; this is defined as a threefold objective in paragraph terms of:
- An economic role to help build a strong, responsive and competitive economy
 - A social role, to support and strong, healthy and vibrant community, and
 - An environmental role to protect and enhance our natural, built and historic environment, including making effective use of land.
- 4.6 The three components need to be pursued in an integrated way looking for solutions which deliver multiple goals. It is therefore clear that what the National Planning Policy Framework wishes to see balanced decision making with all factors considered rather than "development control decisions made in isolation of the three overriding principles.
- 4.7 In line with the three dimensions of sustainable development identified in the NPPF the proposed development performs the following important roles:

Economic: the proposed development will provide a range of economic benefits, including direct employment in its own right, supporting the local economy with an increased footfall and local expenditure and revitalising the housing market through the release of under occupied family housing.

Ensuring the vitality of town centres is identified in the NPPF as one of the Core Planning Principles in delivering sustainable development. A report compiled by 'The Opinion Research



Business’ (ORB) entitled A Better Life: Private Sheltered Housing and Independent Living for Older People sets out the economic benefit that a private retirement housing scheme can bring to a town, and identifies that a scheme of 55 residents generates a weekly spend in local shops equivalent to £610,000 per annum. When compared to a conventional housing development, approximately £2.3 million more in local spending would be spent over the lifetime of the scheme. This is further expanded within section 6 of this statement.

Social: The NPPF stipulates that the planning system should be ‘supporting strong, vibrant and healthy communities’ by ‘providing the supply of housing required to meet the needs of present and future generations’ (paragraph 7). Paragraph 50 of the NPPF highlights the need to ‘deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...such as...older people’ [emphasis added].

Older people are defined as in Annex 2—Glossary of the NPPF as “people over retirement age, including the active, newly retired through to the very old frail elderly whose housing needs can encompass accessible, adaptable general needs housing for those looking to down size from family housing and the full range of retirement and specialised housing for the elderly”

Environmental: The redevelopment of previously developed land is identified as a Core Planning principle with paragraph 11 of the NPPF which states that LPA’s should ‘encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value.’

The development of this site would therefore reduce the pressure to develop greenfield sites in order to meet the Council’s housing requirements.

- 4.8 In conclusion, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is located on an inherently sustainable site, providing a specialist form of accommodation for the elderly that addresses the urgent and increasing need within the district. It is therefore wholly in keeping the concept of sustainable development detailed within the NPPF.

Summary

- At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.
- The three dimensions of sustainable development are economic, social and environmental.
- The proposed development is the epitome of sustainable development meeting the three areas in the following way:
 - Economic - Residents increase spend in local shops and services, long and short term employment.
 - Social - Provides a form of housing that meets current and future housing needs. Supports health, social and cultural well being.
 - Environmental - Makes effective and efficient use of a brownfield site.

Housing Supply

- 4.9 Paragraph 59 states 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, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay’.*
- 4.10 The former Coalition Government’s number one priority was to get the economy growing again. In respect to the planning system playing its part in achieving this objective the first significant step was the publication of the National Planning Policy Framework in March 2012. On the 6th September 2012 the Government, through the Secretary of State for Communities and Local Government, announced further changes to the planning system.
- 4.11 In a ministerial statement the Secretary of State identified the need for new housing as acute whilst supply remained constrained. He identified 75,000 new homes were stalled through historic S106 legal agreements that through the imposition of excessive affordable housing contributions had rendered schemes unviable. Measures are to be brought in to allow the renegotiation of S106 agreements to bring housing sites forwards. The statement places development viability at the forefront of national planning policy and sends out a clear indication of the importance of making planning decisions based on the benefits they would have for economic development.
- 4.12 Chapter 5 of the document sets out the Government’s objective in delivering a wide choice of high quality homes. Firstly, and notably the guidance in this section is set out against the objective at the start of Paragraph 59 ‘of significantly boosting the supply of homes’. This is recognition of the level of need for new housing across the country against the recent dwindling trend of housing supply.
- 4.13 Paragraph 61 states that: *‘Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, ... older people, ... people with disabilities ...).’ This is of relevance when considering the sustainability of the application site. It also advises that ‘relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.’*
- 4.14 The NPPF stipulates that the planning system should be ‘supporting strong, vibrant and healthy communities’ by *‘ensuring that a sufficient number and range of homes can be provided ’ (paragraph 8) [emphasis added]. Paragraph 60 of the NPPF highlights that ‘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.’*
- 4.15 A clear, priority need for private sheltered accommodation for the elderly has been established in ‘The Need for Specialist Accommodation for Older Persons’ chapter of this report as well as supplementary report that accompanies the application and the proposed development will assist the Council in meeting this housing need. Importantly however, the proposed development will enable older people to remain in their local environment and / or close to

friends and family, allowing them to continue to play an important role in their local community. The proposed development is therefore considered to be inherently sustainable in social terms.

Summary

- NPPF objective to boost significantly supply of housing.
- Housing applications should be determined in the context of the presumption in favour of sustainable development.
- Local Planning Authorities housing policies will not be considered up to date unless they can demonstrate a five year supply of deliverable housing sites, which can not be demonstrated in this case.
- Local Planning Authorities should plan for a mix of housing based on current and future demographic trends including housing for older persons.
- The proposed development meets the housing objectives of the NPPF in the following ways:
 - Contributes to the Local Planning Authorities 5 year supply of deliverable housing sites.
 - Makes efficient and effective use of land as a finite resource.
 - Provides a specialised form of housing that there is an identified national and local need form.
 - Stimulates the housing market by recycling underused sites so they can better meet a community's housing needs.

Design

- 4.16 Chapter 12 sets out the Government's objective in achieving well designed places. In Paragraph 124 it is explained that the Government attaches great importance to the design of the built environment:

"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

- 4.17 The Government requirement is for 'good design' and Paragraph 127 talks about planning for, and achieving *'functional, attractive and sympathetic designs'*.

- 4.18 A strong sense of place is created by developments that are:

"are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change"

- 4.19 Paragraph 128 advises:

"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests."

Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and

effective engagement with the community should be looked on more favourably than those that cannot.”

- 4.20 In evolving design solution the NPPF encourages pre-application engagement with the local community, statutory consultees and the local planning authority (Paragraphs 39-42). The applicants in this case have complied with the advice and consulted with the local community and interested bodies. A Statement of Community Involvement has been submitted with the application, which demonstrates the extensive consultation activities that have been undertaken prior to the submission of the planning application. The application of design policy is considered in further detail in the accompanying design and access statement.

Summary

- Good design goes beyond just visual appearance it is about how successfully connects people and integrates into the natural and built environment.
- Design policies should not attempt to impose architectural style or stifle innovation or originality.
- It is right to promote or reinforce local distinctiveness where that exists.
- The NPPF encourages pre-application engagement with the local community, statutory consultees and local planning authority, which the applicant has carried out with this application submission.

Heritage

- 4.21 Paragraph 184 of the NPPF states that heritage assets “should be conserved in a manner appropriate to their significance” and the designation of Conservation Areas should only occur where an area justifies such a status due to its special architectural or historic interest..
- 4.22 Paragraph 192 takes this further by stating that local planning authorities should take account of the following when determining applications:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.23 When looking at harm caused by proposals paragraph 197 states that *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 4.24 In this application it is considered that the proposed development would retain and conserve the west boundary wall of the site on Market Street, which is the most prominent and intact structure; however, the loss of the other structures and the historic use would result in a low level of less than substantial harm to the significance of the Conservation Area. In accordance with Paragraph 196 of the National Planning Policy Framework, this level of harm should be weighed against the public benefits of the proposal, including the provision of retirement



housing in a considered, contextual and attractive scheme which would contribute positively to the surrounding streetscape.

National Planning Practice Guidance

- 4.25 The most recent and relevant document is the online National Planning Practice Guidance published in August 2013 which has had subsequent amendments the last of which was in July 2019.

Housing

- 4.26 The planning practice guidance requires local planning authorities to objectively assess housing needs of their jurisdiction. The guidance requires an objective assessment of both affordable and market housing needs and is expected to include evidence an assessment of future quantity of housing needed and a breakdown of that need by type, tenure and size. This will mean that local planning authorities will need to better assess and evidence need for older persons accommodation across both public and private sector. In respect to the delivery of housing to meet the needs of older people the NPPG states:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking” [emphasis added].

Paragraph: 001 Reference ID: 63-001-20190626

Design

- 4.27 The guidance advises decision takers to seek a high-quality design and reiterates the NPPF comment that good planning is indivisible from good design. It advises that local planning authorities should give great weight to design that is outstanding or innovative which help to raise the standard of design more generally in an area.
- 4.28 The guidance attempts to identify the common features or qualities of ‘good design’. It is considered that some of those qualities listed are directed more towards larger schemes and place setting but those that are considered appropriate to the proposed scheme are;
- Functional;
 - Adaptable and Resilient;
 - Display a Distinctive Character;
 - Attractive; and,
 - Encourage an Ease of Movement.
- 4.29 The guidance also lists the key points to consider when looking at design. These include character of the area, local context, scale, detailing, accessibility to name a but a few. The full list of design considerations is considered in more detail in the Design and Access Statement



which also includes an assessment of the scheme against the National Design Guide that was introduced in October 2019.

- 4.30 The role that pre-application discussions with the local planning authority, statutory consultees, local stakeholders and residents is emphasised and encouraged. This is something that has been actively pursued with the propose scheme and I would refer to the accompanying Statement of Community Involvement..

LOCAL POLICY

- 4.31 The Local Development Plan is made up of the Managing Development and the Environment Development Plan Document 2010, Development Land Allocations Development Plan Document (April 2008), Tonbridge Central Action Plan (April 2008), Core Strategy (September 2007) and the ‘saved’ policies of the adopted Wealden Local Plan (2010). The development plan documents need to be read in conjunction with the national planning policy framework and guidance.

Managing Development and the Environment Development Plan Document Adopted April 2010

CC1 – Sustainable Development	
Policy	Response
All proposals for new development will be required to incorporate passive design measures to reduce energy demand using insulation, air tightness, window locations, landscaping, ventilation and green roofs. Development is also encouraged to meet Level 4 of the Code for Sustainable Homes and achieve at least 10% CO2 savings while the Council will have regard to the impact of these requirements on the viability of development.	Please see the sustainability report that accompanies this application which demonstrates how current targets and aspirations will be met.
CC3 – Sustainable Drainage	
Policy	Response
Developments must not have an unacceptable effect on the water environment, including surface water and groundwater quality and river corridors, incorporate SUDS with an appropriate management strategy or use an appropriate alternative means of surface water drainage if it is not practical to use SUDS.	Please see the flooding and drainage information which accompanies the application which confirm that the site will be drained through a SUDS system.

NE3 – Local Biodiversity	
Policy	Response
Developments which would adversely affect biodiversity or the value of wildlife habitats across only be permitted where appropriate mitigation and/or compensation measures are provided and must make provision for the retention of the habitat and protection of its wildlife link. Where development is approved conditions and/or planning obligations will be used to minimise disturbance, protect and enhance the sites conservation value, contribute towards the Kent Biodiversity Action Plan, ensure management and creating new habitats where loss or damage is unavoidable.	The proposals will see an improvement on the existing biodiversity on a site which is laid mostly to hardstanding through the introduction of green spaces and additional ecological features. Please see the ecological report that accompanies that application for further details.
SQ1 – Landscape and townscape protection and enhancement	
Policy	Response
Proposals will be required to reflect the local distinctiveness, condition and sensitivity to change of the local character areas. All new development should protect, conserve, and where possible enhance the character and local distinctiveness of the area including its historical and architectural interest, the distinctive setting of, and relationship between, the pattern of settlement, roads and the landscape, urban form and important views and the biodiversity value of the area.	These proposals are for a well designed development that is sensitively in keeping with the surrounding area in terms of design bulk and materials, as set out further in the Design and Access Statement and Heritage Statement which accompanies this application.
OS4 - Priority Areas for New Publicly Accessible Open Space	
Policy	Response
Development which provides publicly accessible open space will be supported with adequate provision made for its maintenance.	The proposals include improvements to the public realm around New Wharf Road and River Walk.

Managing Development and the Environment Development Plan Document Adopted April 2010

CP1 – Sustainable Development	
Policy	Response
<p>All proposals for new development must result in a high quality sustainable environment, with provision being made of housing and other development to meet residents needs. Need for development will need to be balanced against the protect and enhance the natural and built environment. Development will seek to minimise waste generation, reduce the need to travel and minimise water and energy consumption with 10% of energy requirements to be generated on-site from alternative energy sources and the potential for recycling waste. Where practicable, new housing development should include a mix of house types and tenure and mixed use development will be promoted in appropriate locations such as town centres. Development will be concentrated at the highest density compatible with the local built and natural environment mainly on previously developed land in existing settlements where a reasonable range of services and transport modes are available. Development must minimise the risk of crime and should make appropriate provision for the infrastructure necessary to serve new development.</p>	<p>The development site is located within the Tonbridge Urban Area and Tonbridge Central Area so is extremely sustainably located. The development provides for an identified need of older persons housing in the local area and makes use of an existing brown field site with a development of appropriate density. The development will sustainable in terms of energy and waste requirements while also ensuring that crime will be minimised and required infrastructure is provided for. For full details please see the Design and Access Statement and Energy Statement which accompanies this application.</p>
CP2 – Sustainable Transport	
Policy	Response
<p>New development should be well located to public transport, cycle and pedestrian routes, minimise the need to travel, be compatible with the highway network, make highway safety / capacity improvements where necessary, ensure accessibility for all, including the elderly.</p>	<p>As set out above the proposed development is in an extremely sustainable location and will have safe access and minimal impact upon the highway network as set out in the Transport Statement which accompanies this application.</p>
CP10 – Flood Protection	
Policy	Response
<p>Developments should first make use of areas at no or low risk and where acceptable must be subject to a flood risk assessment, include an</p>	<p>While the site is within flood zone 3 the extant consent on the site indicates that it is appropriate for built development as further</p>

appropriate safe means of escape and mitigate the effects of flooding	set out in the Flood Risk Assessment which accompanies the application.
CP11 – Urban Areas	
Policy Development will be concentrated within the confines of urban areas.	Response The site is located within the Tonbridge Urban Area and is suitable for development as demonstrated by the extant permission on the site.
CP 15 – Housing Provision	
Policy Provision is made for the development of at least 6,375 dwellings in the period 2006-2021. Outside of Strategic Sites housing permitted, on sites which accord with the sustainability principles established in Policy CP1, the settlement hierarchy defined in Policies CP11, 12 and 13 and other Core Policies as appropriate.	Response The proposed development would contribute towards meeting the Council housing need, where there is a current failure to meet the five year housing land supply, while meeting a specific need for older persons housing and accords with the relevant local policies.
CP17 – Affordable Housing	
Policy In the Urban Areas affordable housing provision will be sought on all sites of 15 dwellings or above, or 0.5ha or above, at a level of 40% of the number of dwellings and in exceptional circumstances, it may be agreed that affordable housing may be provided on another site or by means of a commuted sum.	Response The policy predates the NPPF which identifies the importance of maintaining development viability. Given the nature of this form of accommodation with its additional levels of non saleable floorspace, development viability is a consideration if this form of accommodation is to be delivered. The level and nature of affordable housing provision associated with the scheme is considered in Section 6, and within the accompanying financial viability assessment.
EN23 – Tonbridge Town Centre	
Policy Tonbridge Town Centre should provide for a sustainable development pattern of retail, employment, housing and leisure uses, and a range of other services to regenerate and enhance the vitality and viability of the Town Centre.	Response The proposed development would provide for older persons housing within the Town Centre area which will bring people into the Town Centre where they will use the shops and other facilities within the area and have a direct impact upon spending in the area and thereby improve the vitality and viability of the area.

	Full details are contained in section 6 of this statement.
CP24 – Achieving a High Quality Environment	
Policy	Response
All development must be well designed and of a high quality in terms of detailing and materials, and must respect the surrounding area in terms of scale, density, layout, siting, character and appearance while according to the Kent Design Guide and other relevant Supplementary Planning Documents. Development should also seek to protect or enhance open spaces, landscape, water environments and wildlife habitats.	These proposals are for a well designed building, following the extant permission on the site, that is in keeping with the surrounding area in terms of design bulk and materials and does not impact upon the amenity of the surrounding residents, as set out further in the Design and Access Statement that accompanies this application. Furthermore there would be no impact upon any important views. The proposals have evolved alongside a full and integral landscaping strategy, including public realm space as set out in the landscape drawings.
CP25 – Mitigation of Development Impacts	
Policy	Response
Development proposals should either incorporate the infrastructure required, or make provision for financial contributions and/or land to secure such infrastructure or service provision at the time it is needed, by means of conditions or a planning obligation.	The proposed development should not require changes to local infrastructure and any requests for infrastructure works will be considered in line with CIL legislation.

Tonbridge Central Area Action Plan Adopted April 2008

TCA1 – Quality of Development	
Policy	Response
Proposals must provide a well designed, animated frontage providing a clear definition, but seamless character between public and private space, make provision for a connected network of streets giving priority to pedestrians, provide car and cycle parking, design, scale and layout must respect the context of the site and the character of the part of the Town Centre within which it is located whilst respecting views from the Castle	These proposals are for a well designed building, following the extant permission on the site, that is in keeping with the surrounding area in terms of design bulk and materials while respecting views from the Castle, as set out further in the Design and Access Statement that accompanies this application. The public realm around the site will also be improved Parking is provided at a suitable level for the type of accommodation to be provided as set out in the Transport Statement. Which further states

	that the development will not have any impact upon the pedestrian or vehicle routes.
TCA10 – Public Realm Priorities	
Policy Developments should enhance the public realm to improve the appearance and accessibility of the Town Centre to include access to public spaces, high quality materials and street furniture, provision of pedestrian and cycle routes and appropriate servicing.	Response The proposals have evolved alongside a full and integral landscaping strategy, including public realm space, which will be of high quality and not impact upon access routes, as set out in the landscape drawings.
TCA12 – Transportation Matters	
Policy Developments should reduce the need to travel.	Response The development site is located within the Tonbridge Urban Area and Tonbridge Central Area so is extremely sustainably located where people will access shops and facilities without the need of a car.
TCA15 – Parking Standards	
Policy Parking will be in accordance with the Kent County Council Parking Standards.	Response McCarthy and Stone have vast experience in providing the appropriate levels of parking on their schemes that meets the needs of the end users full details of which are contained in the Transport Report that accompanies this application.
TCA 16 – Parking Provision	
Policy Car parking should be accommodated discretely so that it does not dominate views of the development.	Response As per the extant permission on the site the proposed development will have under croft parking so it will not be visible from the public realm.

TCA17 – Cycling	
Policy	Response
All developments will need to provide secure and conveniently located facilities for cyclists, including parking.	Cycle parking can be provided within the mobility scooter store to cater for the cycle users who will occupy the development. Full details are contained within the Transport Statement.

Emerging Local Plan Regulation 22 Version January 2019

- 4.32 The Local Plan was submitted for examination in January 2019 with a hearing taking place during October 2020 and following which there has been an exchange of correspondence between the Inspectors and the Council. In the most recent correspondence from March 2021 the Inspectors confirmed that they consider there to have been a failure to comply with the duty to cooperate and gave the Council two options to either withdraw the plan from examination or the final report will be produced recommending its non-adoption due to this failure. The Council have indicated that they are not willing to withdraw the plan and invited the Inspector to prepare their final report. Therefore only limited weight can be attached to this document at this time where it appears that it is some way from being adopted.

LP1 – Presumption in Favour of Sustainable Development	
Policy	Response
Planning applications that accord with the policies in this Development Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.	As set out through this statement the application is in accordance with local policy and should be approved without delay.
LP3 – Housing Provision	
Policy	Response
Provision is made in this Local Plan for at least 6,834 dwellings to 2031.	The proposed development would contribute towards meeting the Council housing need, where there is a current failure to meet the five year housing land supply, while meeting a specific need for older persons housing and accords with the relevant local policies.
LP7 – Tonbridge Town	
Policy	Response
In the broader Tonbridge central area development will be supported where it can be demonstrated that it will maintain and where possible enhance the vitality and viability of the area as a whole and does not result in unacceptable impacts on the highway network, air quality, and the amenity of the area.	These proposal will provide additional spending to the Town Centre as the residents of the proposed development will spend money in the surrounding area, more so than for an open market housing scheme, as set out in section 6. These proposals will not have a detrimental impact upon the amenity of the area.
LP14 -Achieving High Quality Sustainable Design	
Policy	Response
New development must protect the local distinctiveness of the area, protect the amenity of the local area and be well designed of a high quality in terms of detailing, use of materials, scale, density, layout, setting character and appearance. Development should also be designed to maximise opportunities to reduce energy demand, deter crime and the fear of crime, maximise opportunities for healthy active lifestyle choices and net biodiversity gains.	These proposals are for a well designed building that is in keeping with the surrounding area in terms of design, bulk and materials and does not impact upon the amenity of the surrounding residents, as set out further in the Design and Access Statement that accompanies this application. Furthermore there would be no impact upon any important views. The proposals have evolved alongside a full and integral landscaping strategy. The proposals are sustainable in terms of energy use as set out in the Energy Statement.

LP17 – Flood Risk	
Policy	Response
Proposals will be determined in accordance with the National Planning Policy Framework or any such replacement.	While the site is within flood zone 3 the extant consent on the site indicates that it is appropriate for built development as further set out in the Flood Risk Assessment which accompanies the application.
LP18 – Sustainable Drainage Systems (SuDS)	
Policy	Response
SuDS for the management of run-off must be provided for as part of major development.	An appropriate SuDS scheme has been considered for the site as set out in the Drainage Statement which accompanies this application.
LP19 – Habitat Protection and Creation	
Policy	Response
Major development should, where practicable and proportionate, make space for nature by including, as an integral part of the external building fabric and opportunities for habitat creation for wildlife.	The proposals will see an improvement on the existing biodiversity on a site which is laid mostly to hardstanding through the introduction of green spaces and additional ecological features.
LP20 – Air Quality	
Policy	Response
Development which could result in material additional air pollutants and a significant worsening of levels of air quality or introduce new receptors into an area of poor air quality, within the area will not be permitted unless evidenced, specifically identified and detailed measures to offset or mitigate those impacts are introduced as part of the proposal.	The proposals being considered would not impact on existing air quality and the ventilation measures in place ensure that residents will not be impacted by poor air quality. Please see the Air Quality Statement that accompanies the application for further details.
LP23 – Sustainable Transport	
Policy	Response
Developments should be designed to maximise sustainable transport modes, make contributions to the provision of existing or new transport schemes and makes provision for car parking.	This site is in a highly sustainable location. McCarthy and Stone have vast experience in providing the appropriate levels of parking on their schemes that meets the needs of the end users full details of which are contained in the

	Transport Statement that accompanies this application.
LP39 – Affordable Housing	
<p>Policy</p> <p>In the Urban Areas affordable housing provision will be sought on all sites of 11 dwellings or above, or 1,000 square metres, at a level of 40% of the number of dwellings and in exceptional circumstances, it may be agreed that affordable housing may be provided on another site or by means of a commuted sum.</p>	<p>Response</p> <p>Given the nature of this form of accommodation with its additional levels of non saleable floorspace, development viability is a consideration if this form of accommodation is to be delivered. The level and nature of affordable housing provision associated with the scheme is considered in Section 6, and within the accompanying financial viability assessment.</p>
LP40 – Mix of Housing	
<p>Policy</p> <p>Major residential development should provide a mix of dwelling types having regard to the evidence in the Strategic Housing Market Assessment.</p>	<p>Response</p> <p>The proposals are for a form of specialist accommodation for older people for which there is a clear need in the local area as identified in section 3 of this statement and the Housing Needs for Older People Assessment which accompanies this application.</p>
LP42 – Parking Standards	
<p>Policy</p> <p>Parking will be in accordance with the adopted Parking Standards while also taking into account local circumstances. Electric charging points will also need to be provided in residential developments.</p>	<p>Response</p> <p>McCarthy and Stone have vast experience in providing the appropriate levels of parking on their schemes that meets the needs of the end users full details of which are contained in the Transport Report that accompanies this application. Appropriate provision will be made for electric vehicle charging points, as set out in the Transport Statement.</p>
LP43 – Internal Space Standard	
<p>Policy</p> <p>Major residential development will be required to meet the Government’s nationally described space standard.</p>	<p>Response</p>

	The proposed scheme will meet these standards as set out on the Design and Access Statement which accompanies this application.
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Supplementary Planning Documents

4.33 In addition to the development plan documents listed above the Council have a number of adopted Supplementary Planning Documents relevant to the application proposal:

- Kent Design Guide.
- Guides to Renewable Energy Technologies.

These documents are addressed in the Design and Access Statement which accompanies this application.

5 Development Proposal

The Proposal

- 5.1 The proposal is for the redevelopment of the site to provide a 36 Retirement Living apartments for older persons (C3 use) with communal facilities, landscaping and parking.

Five Year Housing Land Supply

- 5.2 Paragraph 73 of the NPPF requires local planning authorities to be able to demonstrate a five year supply of deliverable sites for residential development. In addition a further buffer of 5% provision, 10% if the Local Planning Authority is to provide an annual position statement to account for any fluctuations in the market or 20% if a persistent record of under delivery, of land is required by the NPPF. A failure to be able to demonstrate such a level of supply will deem the local planning authorities' policies regarding housing supply to be out of date.
- 5.3 The Council's latest Five Year Housing Land Supply Position is based upon the housing need of 843 dpa plus a 5% buffer, the Council is able to demonstrate 2.93 years of housing land supply between 1 April 2020 and 31 March 2025. Accordingly, Paragraph 11 of the NPPF applies and the Council's policies relating to housing supply are out of date, and the presumption in favour of sustainable development should apply and development proposals that accord with the development plan should be approved without delay unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 5.4 The National Planning Practice Guidance advises the following in its Guidance on Housing and Economic Land Availability Assessments:

How should plan-making authorities count specialist housing for older people against their housing requirement?

Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.

(Paragraph: 016a Reference ID: 63-016a-20190626 Revision date: 26 June 2019)

- 5.5 The proposed development will therefore contribute to meeting the Council's older persons housing requirement, and contribute towards meeting overall housing numbers during the plan period.

Principle of Development

- 5.6 The principle of residential redevelopment of the site is acceptable as the site is located in a very sustainable location within a built up area within the Town Centre. The loss of the existing car park has been considered acceptable as per the extant approval which covers the site (LPA ref: 20/01122/FL).



- 5.7 The extant consent is for the construction of a 70-room hotel; 10 residential units; retention of the existing ground floor retail unit with façade upgrades. Due to impact of Covid-19 on the wider economy but particularly on the tourism industry, the land owners have been unable to secure an agreement with a hotel provider. The extended period of forced closure or at best operating under severe restrictions continues to devastate the sector, with cash conservation, liquidity and survival all of critical concern. Moreover, the business rates relief cap outlined in the Budget 2021, will result in many businesses paying full rates from July onwards. There is growing concern in the UK hospitality sector that without a further extension to business rates relief, potentially for a full six months following reopening, many jobs and businesses remain at risk. Further compounding the issue, is the government's latest announcement that it will legislate to "rule out" business rates appeals related to the COVID-19 pandemic. Whilst a £1.5 billion rates relief package will be available to support businesses most affected, the legislation will prevent adjustments to business valuations, potentially undermining a business's viability.
- 5.8 The need however for older persons accommodation is well set out in this statement and the Seniors Housing Need Assessment and that due to growth in the older population there will be a requirement for specialist housing. Furthermore, developments of this type brings forward an extensive range of financial, social and environmental benefits as set out in section 6 of this statement and associated appendices. It is therefore considered that the proposed scheme is a better use of this valuable brownfield site than the existing car park with a consent for a hotel that looks likely to remain unfulfilled where there will be many benefits to come from the proposed type of housing where there is a growing unmet need.
- 5.9 A separate application is proposed to run in parallel, relating to partial demolition, conversion and extension of the existing building to form 6 residential units; retention of commercial use at ground floor (Use Class E) and façade upgrades to the High Street frontage. Separate red line boundaries are proposed because the Sites will be owned and built out by separate commercial entities following the grant of planning permission. This approach enables a distinction between land parcels for the purpose of imposing planning conditions and obligations. Enabling works, including the partial demolition of the existing building will be carried out by the land owners.

Sustainable Development

- 5.10 In the context of the NPPF and its objectives to achieving sustainable development the proposal meets the three identified roles of sustainable development in the following way;
- Economic - the proposed development will provide a range of economic benefits, including direct employment in its own right, supporting the local economy with an increased footfall and local expenditure and revitalising the housing market through the release of under occupied family housing.
 - Social – it provides specialised accommodation for older people which is considered by Government to be 'critical' that the planning system delivers. Providing housing choice for older people to specifically meet their needs has been demonstrated to have beneficial impacts on health, well being, decreasing pressures on adult health and care services. It also provides companionship to many single older persons.
 - Environmental — the proposal looks to make efficient and effective use of a previously developed site whose development will contribute significantly to housing numbers given the

local planning authority's inability to demonstrate a 5 year housing land supply. It would help protect unallocated Greenfield land from the threat of development.

- 5.11 Accordingly, it is considered that the proposed scheme meets the criteria of sustainable development as set out by the NPPF and the Council's planning policy.

Heritage Assets

- 5.12 North of the site is Tonbridge Castle, a Scheduled Ancient Monument and a Grade I Listed building and the Tonbridge Conservation Area wraps around the site but excludes it. The site forms part of the setting of the Conservation Area, and although much more loosely, forms a minor part of the setting of the castle through medium to longer range views. The redevelopment of the site would therefore have the potential to affect the significance of these assets through direct impacts or through change in their setting. The proposed development would retain and conserve the views to the Castle, as per the extant consent and would result in a low level of harm to the setting of the Castle and the significance of the Conservation Area. This level of harm should be weighed against the public benefits of the proposal, as outlined in this statement. Please see the Heritage Report which accompanies this application for further information.

Design and Character

- 5.13 The scheme has evolved through an analysis of the site, its constraints and a wider assessment of the area. The proposed building provides a modern design approach to the building following the line of the extant consent and drawing upon local references in terms of the palette of materials and detailing. Further information regarding the proposed design of the building can be found in the accompanying Design and Access Statement. The proposal meets the national planning policy objectives for good design.

Impact on Residential Amenities

- 5.14 The proposals would not impact any further upon neighbouring residential amenities in terms of overlooking, overbearingness or loss of daylight / sunlight due to the orientation of the building and separation to neighbouring buildings. Further details are provided in the Design and Access Statement that accompanies this application.

Impact on Highways and Parking

- 5.15 McCarthy & Stone has unsurpassed experience in providing for the car parking needs of its specialised housing developments. Specialised housing for the elderly, because of its very nature and concept, is invariably located within reasonable walking distance of shops and other essential services and close to public transport facilities. It can therefore be predicted that the level of car parking proposed, given the age of the intended residents, will adequately supply sufficient parking for the residents, house manager and visitors. This level will be more than sufficient to meet the needs of the development. I would refer to the Transport Statement for more details of consideration of access and levels of parking provision.

Amenity Space Provision

- 5.16 From McCarthy & Stone's considerable experience the most important amenity space for elderly residents is not external to the building but includes the residents' lounge, and the other



communal facilities contained within the building. The Company employs a professionally qualified Landscape Architect and prides itself on the quality of its landscape treatment, which has become a “hallmark” of all McCarthy and Stone retirement schemes. A landscaping scheme is provided as part of the proposed application which as well as providing a suitable form of amenity will also provide a suitable green setting for the building .



- 5.17 It is important to note the experience the applicant has in designing and building specialised accommodation for older persons. This was not lost on the Inspector at the applicant’s development in Norwich;

‘However, the appellants have wide experience in providing sheltered accommodation for elderly clients and, presumably, a detailed knowledge of their expectations. They would, in my opinion, be unlikely, therefore, to promote a development that potential purchasers would find unacceptable in respect of available amenity space. They note that there are internal communal areas, in addition to private sitting rooms, that would be available to the residents and also that individuals would have a choice whether or not to purchase apartments in the building. I have already concluded that the landscaping areas would be sufficient to provide a suitable green setting for the building in this urban area and that these, combined with the street trees and those other nearby sites would give a pleasant outlook for the occupiers.

‘There would be sitting out areas available for those who wanted them and I am not persuaded that the level and quality of the external amenity spaces are such that they should warrant refusal of the proposals.’

Affordable Housing

- 5.18 The proposed development is for 36 dwellings and the Council’s affordable housing policy is applicable to the scheme. Both the Core Strategy policy and the NPPF identify the importance of maintaining development viability. Given the nature of this form of accommodation with its additional levels of non saleable floorspace, development viability is always a consideration if this form of accommodation is to be delivered. Accordingly, a viability appraisal has been submitted with the application for consideration, which identifies that the proposed scheme could viably provide towards affordable housing provision. The applicant is willing to cover the Council’s reasonable costs of assessment.

Community Infrastructure Levey

- 5.19 While the Council do not have an adopted Community Infrastructure Levey charging schedule and contribution to which this scheme will comply with CIL legislation.

Pre Application Engagement

- 5.20 The NPPF actively encourages pre-application engagement between local planning authorities and applicants, and applicants and the local community (Paragraphs 39-42). It should be noted in this instance that the applicant engaged fully with council officers prior to submission of the application and the local community through an exhibition. A Statement of Community Involvement has been submitted with the application which sets out the engagement and feedback received to the proposed scheme.



6 Material Planning and Social Benefits of Extra Care Housing

- 6.1 In determining this application it is appropriate for the decision maker(s) to not only have regard to compliance with national and local planning policy but to also have regard to material planning benefits to be accrued by the proposed development, in coming to a balanced judgement on the merits of the application proposal. In respect to the development proposal I consider that the planning benefits listed below weigh heavily in favour of the proposed development.

Housing Benefits

- 6.2 The proposed scheme as identified by previous sections of this statement will deliver housing to meet two identified local housing needs—older persons accommodation and contribution towards the provision of general housing. In respect to the provision of older persons accommodation the Government have set out that its delivery is ‘critical’. Locally the Council have recognised the projected increase in the older age cohorts of the population and acknowledged that a choice of housing options for older people will need to be provided to meet the housing need and that there is an unmet need for the specialist accommodation of older people. Accordingly, I consider that significant weight should be afforded to the development proposal given its proposed delivery of specialist accommodation for older persons.
- 6.3 A further housing benefit of retirement developments is the propensity of them to free up existing under occupied housing stock in the area and catalyse housing chains. A report carried out by Shelter in 2012 calculated that nationally if the 20% of older households which are currently under-occupied were to downsize, around 840,000 family sized homes would be released, including 760,000 in the owner occupied sector. McCarthy & Stone find on average around 60% of occupants move into a McCarthy & Stone scheme from within a five mile radius of the site. This increases for larger cities or metropolitan areas with a higher populous of older people.
- 6.4 A report prepared by WPI strategy and Homes for Later Living, “Chain Reaction”, covers the benefits to the housing chain and helping first time buyers join the housing ladder and notes c.3 million people in the UK over the age of 65 (or 25%) want to downsize. It estimates that every Homes for Later Living property sold generates two moves further down the housing chain, and in certain circumstances this may be more. This frees up homes at differing stages of the housing ladder for different demographics. A typical Homes for Later Living development which consists of 40 apartments therefore results in 80 additional moves further down the chain. Roughly two in every three retirement properties built releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. If 30,000 Homes for Later Living properties were built per year this would be 20,000 first time buyer properties being released each year. A copy of this report is at appendix H.

Economic Benefits

6.5 The NPPF identifies the planning system as having a key role in building a strong and competitive economy. The provision of specialised accommodation for the elderly would also provide other benefits to the community and local economy as a whole. A significant benefit to the town from the scheme would however be the intended elderly residents themselves. If approved, the development once fully occupied, is likely to accommodate around 75 residents who given their age are likely to use the shopping and other facilities of the nearby local shops on a regular basis.

6.6 Research undertaken by ORB in respect of private sector sheltered housing confirms the above. In their document “A Better Life” (overview provided at Appendix E) published in October 2003, detailed consideration was given to the benefit of developments for the elderly upon local amenities. Chapter 4 of the Report on page 27 identifies the following: -

“Private sheltered housing schemes play a vital part in the life of local communities. The propensity of older people to spend locally is high, assuming there is access to local shops which ordinary housing cannot guarantee.”

6.7 Annexe B of the Report sets out the economic benefit that a private sheltered housing scheme can bring to a town, and identifies that a scheme of 55 residents generates a spend in local shops of £610,000 per annum, and when compared to a conventional housing development some £2.3 million more in local spending over the lifetime of the scheme. The Report also undertook a number of case studies with local traders and on page 27 the owner of a local pharmacy commented: -

“Since the retirement housing scheme opened three years ago, business has definitely increased by ten to twenty per- cent. Businesses locally do well because elderly people tend to shop locally”

6.8 A further report from WPI Strategy “Silver Saviours for the High Street” has found retirement communities create more economic value than any other type of residential development, with residents contributing more to local shops, jobs, services and communities than any other group. The report shows how people living in a typical 45 apartment retirement development generate £550,000 of spending per year - with £347,000 going to local shops on the high street, supporting retail jobs and keeping amenities open. The Government has been urged to harness the spending power of older people to help revitalise our high streets following the Covid pandemic, and one way to do this is to pave the way for more specialist retirement developments in town centres up and down the country. A copy of this report can be found at appendix I.

6.9 This evidence demonstrates the point made by Paragraph 23 of the NPPF very well, that residential developments ‘play an important role in ensuring the vitality of centres.’ The contribution that this form of residential development can play on the local economy should not be underestimated.

6.10 The scheme itself would employ between 1-3 persons in the long term, whilst the redevelopment of the site is likely to see local jobs generated through the construction of the scheme. On average McCarthy & Stone employ circa 60 local companies connected with the construction professions in building their proposed schemes, with anticipation that this would create local work for in the region of 120 people. In a time of economic austerity and planning policies emphasizing the importance of economic issues in decision making this level of



employment is a significant planning benefit. It is considered that there are significant local benefits that weigh in favour of the proposed development.

Social Benefits

- 6.11 The provision of specialist residential accommodation designed specifically to meet the needs of older persons is recognised in having benefits for health care and the well being of residents. There are number of independent reports that look at the health and financial benefits of retirement housing.
- 6.12 The Institute of Public Care (IPC) produced a report entitled 'Identifying the Health Gain Benefits from Retirement Housing', the executive summary of the report has been appended to this statement at Appendix F. As the report states it looks at the benefits in terms of health gain from specialised accommodation for older persons compared to the general market housing stock. The report identifies that retirement housing;
- Is associated with a reduced level of expected nights spent in hospital. This is estimated as producing an annual cost saving to the NHS of £2,598 per resident per annum.
 - On average residents of retirement living schemes experience a 35% improvement in mobility and 20% in functions of daily living. There is also a 25% reduction in the use of medication by residents.
 - Over 50% of residents believe that private sheltered housing helps to promote good health. More than half of all residents (55%) consider their health to be good or very good.
- 6.13 ORB produced a report entitled 'A Better Life: Private Sheltered Housing and Independent Living for Older People', the executive summary is appended to this Statement at Appendix E. In respect to health care benefits the report identified;
- The average number of visits per annum to a GP from current residents of retirement housing is 4.2 compared to 6 visits amongst the national population aged 75+.
 - 41% of residents of retirement housing felt that their health had improved from making the move into retirement housing.
- 6.14 The Homes and Communities Agency carried out a study looking at the 'Financial benefits of investment in specialist accommodation for vulnerable and older people'. The Report found that the financial benefits largely arise from the reduced reliance on health and social care services and were estimated to be around £219 million for nearly 12,400 older people. At a time of austerity in Government expenditure those levels of financial savings are significant and perhaps underline the Government's reference to the delivery of older persons accommodation as being 'critical'.
- 6.15 In additional to the measurable health benefits identified by the referenced reports there is also the immeasurable benefits of companionship and sense of community that retirement housing can provide for older persons. For many single older persons loneliness and isolation can be as debilitating as physical health conditions. Retirement housing can play an important societal role in inclusive neighbourhoods and communities. This has been quantified by a Report carried

out by WPI Strategy “Healthier and Happier. An analysis of the fiscal and wellbeing benefits of building more homes for later living”. This is attached as Appendix G

- 6.16 The research includes new analysis, conducted by a former Treasury economist, the headlines of which in fiscal terms are:
- People living in homes for later living typically experience reduced health risks, contributing to fiscal savings to the NHS and social care services of c. £3,500 per person per year;
 - Building 30,000 more retirement dwellings every year for the next 10 years could generate fiscal savings across the NHS and social services worth £2.1bn per year;
- 6.17 Whilst the whole document is highly pertinent generally in further illuminating the benefits of retirement housing generally, in fiscal terms attention is drawn particularly to Page 11 – 12 and the accompanying Annex.
- 6.18 For many single older persons loneliness and isolation can be as debilitating as physical health conditions. Retirement housing can play an important societal role in inclusive neighbourhoods and communities.

7 Conclusions

- 7.1 The proposed development complies fully with the NPPF's objective of a presumption in favour of sustainable development. It fulfils all three dimensions of sustainable development listed by the NPPF. The proposed development will;
- Provide a range of economic benefits, including direct employment in its own right, supporting the local economy with an increased footfall and local expenditure and revitalising the housing market through the release of under occupied family housing.
 - Provide social benefits through the provision of specialist accommodation for older people, giving older people housing choice to help maintain their independence, remain within an inclusive community, and reduce pressure on health care facilities.
 - Provide environmental benefits through making effective and efficient use of a valuable land resource, assisting with the delivery of housing within a short-term timeframe which would reduce pressures on other unallocated greenfield land for residential development, and through the promotion of sustainable construction methods and techniques.
- 7.2 The Council do not have a 5-year housing land supply and also have an identified need for specialist older persons housing and the principles in favour of sustainable development should apply. Development proposals that accord with the development plan should be approved without delay unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.3 The proposed development accords with both national and local planning policy in respect to the delivery of older persons accommodation, which the recent draft National Planning Practice Guidance has identified its delivery as 'critical' and no other type of housing has had its delivery described in such urgent terms.
- 7.4 The planning benefits of the proposed development are as follows;
- The provision of 36 specialised units of accommodation for older persons which national policy sets out its delivery as 'critical', and the Council's planning policy recognises and supports the provision of, especially in light of the current and future identified need in this type of housing;
 - The redevelopment of an underutilised sustainable site within a defined settlement;
 - A high-quality development that has had regard to the site, its context and local character of the area and would positively enhance the townscape and maintain the setting of a designated heritage asset;
 - The proposed development would have economic benefits for Hailsham with residents having a propensity to rely upon local shops, services and facilities.
- 7.5 Given the above, it is respectfully requested the reserved matters should be discharged, without delay, as being in line with the Local Planning Authority adopted Local Plan.