

Tonbridge & Malling Borough Council

Housing Land Supply Position as at 31 March 2022

1. Introduction

- 1.1 The purpose of this report is to explain and demonstrate the Housing Land Supply (HLS) position for Tonbridge & Malling Borough Council as at 31 March 2022.
- 1.2 The report identifies the measures of performance for the HLS position before explaining the components of the projection and the assumptions made.
- 1.3 To conclude, the report sets out the Council's five-year HLS position and the implications for decision-taking.

2. Measures of performance

- 2.1 **Standard method** - The principal measure of performance, in terms of housing supply, is the Government's standard method for calculating housing need¹. This method starts with the 2014-based household projections published by the Office for National Statistics (ONS)² and takes account of factors such as housing affordability³.
- 2.2 The outcome of this process is a housing need figure (as at 2022) of **835 dwellings per annum** (dpa) or 4,175 dwellings over the five-year period (1/04/22 – 31/03/27). The figure of 835 dpa is capped at 40% above the annual average growth in households for the 10-year period 2022-2032, as per the standard method (step 3).
- 2.3 **Housing Delivery Test (HDT)** - The HDT is an annual measurement of housing delivery devised by the Government. At the time of writing this report, the latest measurement available was for 2021, which looked at delivery over the previous three financial years: 2018/19, 2019/20 and 2020/21. Given that the Council's adopted Local Development Framework is more than five years old, the measure of performance is the housing need generated by the standard method.

¹ Standard method for assessing housing need: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#housing-need>

² 2014-based Household Projections: <https://www.gov.uk/government/statistics/2014-based-household-projections-in-england-2014-to-2039>

³ Median housing affordability ratio: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

- 2.4 The HDT measurements for 2021 were published on 14 January 2021⁴. The measurement for Tonbridge & Malling was **63%**. This means that the supply of housing in Tonbridge & Malling across the three-year period of 2018-2021 fell significantly short of the Government's expectations.
- 2.5 As a consequence of this HDT measurement, a **20% buffer** must be applied to the housing need for the five-year period 2022-2027. This means the need against which the projected supply is assessed increases from 4,175 dwellings to **5,010 dwellings**.

3. Components of the projection – assumptions

- 3.1 The projected supply for the five-year period 2022-2027 includes the following components:
- Extant permissions as at 31 March 2022 (including supply from C2 developments)
 - Windfall allowance (small sites – for years four and five of the projection period)
- 3.2 **Extant permissions** – The housing land supply projection factors in extant planning permissions as at 31 March 2022. As well as C3 uses, the projection also includes supply from C2 uses, eg care homes, because this development frees-up accommodation in the open housing market. This approach is supported by the Government⁵. The number of bed-spaces in C2 developments is converted to the equivalent C3 units based upon the average number of adults living in households.
- 3.3 To ensure the position is as current and as accurate as it can be, those extant permissions that had an expiry date between 1 April 2022 and 30 November 2022 were reviewed. The following (see Table 1) have been discounted from the projected supply (see Table 5) because no evidence could be found to confirm that they have been implemented and that housing development will be taking place on the site.

Table 1: Extant permissions at 31 March 2022 excluded from projection

App. Ref	Proposal	Expiry Date	Not started – Gains	Not Started – Losses
19/02170/FL	Erection of detached two-bedroom bungalow with associated parking and turning space	08/11/2022	1	0
19/01024/FL	Demolition of existing single family dwelling and construction of new building with 4 apartments (3 No 1 bed/2 person and 1 No 2 bed/4 person)	16/08/2022	4	0

⁴ [Housing Delivery Test: 2021 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/housing-delivery-test-2021-measurement)

⁵ [Planning practice guidance on housing supply and delivery](#), para. 035, ref ID: 68-035-20190722

App. Ref	Proposal	Expiry Date	Not started – Gains	Not Started – Losses
	together with associated amenity areas, parking, refuse and cycle stores			
19/01287/FL	Conversion of building currently used as a Dance School, into 4 no. dwellings on the upper floors and develop the basement as B1/D2 use class (resubmission of lapsed planning permission TM/15/02836/FL)	05/08/2022	4	0
19/00602/FL	Change of use from retail shop with flat over to 3-bedroom self-contained town house, with the provision of a timber framed lantern light to front elevation	02/07/2022	1	-1
19/00281/FL	Division of existing flat into two flats and conversion of loft into a third flat. Addition of 4 new dormers and 3 new rooflights to the roof. Addition of 2 new gable windows to the elevations	18/04/2022	3	-1
		Total	13	-2
		Total (net)	11	

3.4 **Extant permissions: phasing** – The phasing of extant permissions was informed by local and national evidence on Build Out Rates (BORs).

3.5 In terms of local evidence, this included the BORs identified in the *Housing Market Delivery Study* prepared by GL Hearn (July 2022). These local BORs were based upon evidence from sites completed since 2011/12. The guide BORs are highlighted in Table 2 (below). The Housing Market Delivery Study forms part of the emerging Local Plan evidence base⁶.

⁶ [Local Plan \(Regulation 18\) consultation evidence base – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk)

Table 2: Guide BOR based on completion data in Tonbridge & Malling between 2011 to 2021

Site size (units)	Previously-Developed Land (PDL) guide BOR (units/year)	Greenfield guide BOR (units/year)
10-49	18	16
50-99	30	23
100-499	57	43
500-999	80	68
1,000-1,499	94	107

Source: GL Hearn analysis

- 3.6 The BORs were also checked by the piece of research *Start to Finish* (second edition, February 2020)⁷ prepared by Lichfields. This piece of research looked at sites across England and Wales (outside of London). Table 3 highlights the findings of this research:

Table 3: Average annual BORs (England and Wales)

Site size (units)	BOR (units/year)
50-99	22
100-499	55
500-999	68
1,000-1,499	107
1,500-1,999	120
2,000+	160

Source: Lichfields analysis

- 3.7 **Windfall allowance** – The housing projection for the five-year period 01/04/22 to 31/03/27 includes a windfall allowance for small sites (fewer than five units). The methodology for this allowance is explained in the *Windfall Allowance Methodology Paper* that forms part of the

⁷ [Start to Finish \(second edition\): What factors affect the build-out rates of large scale housing sites? \(lichfields.uk\)](https://www.lichfields.uk/start-to-finish-second-edition-what-factors-affect-the-build-out-rates-of-large-scale-housing-sites/)

evidence base for the emerging Local Plan⁸. It considers trend data from 2008/09 onwards and excludes data from garden development in built-up areas. Table 4 highlights the trend data.

Table 4: Small sites windfall data (2008/09 – 2020/21)

Year	Total (net)
2008-09	60
2009-10	33
2010-11	46
2011-12	28
2012-13	94
2013-14	95
2014-15	52
2015-16	101
2016-17	95
2017-18	117
2018-19	52
2019-20	72
2020-21	71
Annual Average	70

- 3.8 The average annual supply during the trend period (70 units) has only been included from year four of the projection period onwards to avoid double counting of commitments during the early years.
- 3.9 A windfall allowance for large sites (five units or more) is not included in the five-year projection period from 01/04/22. However, a windfall allowance for large sites is factored in after this period, as explained in the *Windfall Allowance Methodology Paper*. The reason why a windfall allowance for large sites is not included in the five-year projection is because the majority of the supply during this period from large sites will already enjoy planning permission at the base date.

⁸ [Local Plan \(Regulation 18\) consultation evidence base – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk)

4. Housing land supply position

- 4.1 Based upon the housing need of 835 dpa plus a 20% buffer, the Council is able to demonstrate **3.22 years of housing land supply** between 1 April 2022 and 31 March 2027. This position is summarised in Table 5. The full list of extant planning permissions as at 31 March 2022, including C2 permissions, is set out in Appendix A.

5. Implications for decision-taking

- 5.1 Being unable to demonstrate a five-year supply of deliverable sites means that in determining planning applications the presumption in favour of sustainable development, as set out in the National Planning Policy Framework, applies⁹.
- 5.2 The Council is taking positive steps to get an up-to-date Local Plan in place. Consultation on the Regulation 18 Plan concluded on 3 November 2022 and it is the intention to consult on the Regulation 19 Plan during the autumn 2023, with the view of submitting the Plan for examination at the beginning of 2024. This timetable is set out in the adopted Local Development Scheme: <https://www.tmbc.gov.uk/local-plan/local-plan-key-stages>.

⁹ [National Planning Policy Framework - 2. Achieving sustainable development - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-2-achieving-sustainable-development-guidance)

Table 5: Housing Land Supply Position as at 31 March 2022

Standard method housing requirement of 835 dwellings per annum (dpa)
- Projected housing land supply for the 5 year period from 1 April 2022 to 31 March 2027

Year	Sites with Permission (1)	Sites With Permission Demolitions (1)	Small Sites Estimate (2)	Large Sites Windfalls (3)	Kings Hill Phase 3 (635 units)	Holborough Quarry	Peters Pit (aka Peters Village)	Tonbridge Central Area Completions and Permissions	Tonbridge Central Area Demolitions	Liberty Kings Hill Appeal Decision: Appeal A	Liberty Kings Hill Appeal Decision: Appeal B	Liberty Kings Hill Appeal Decision: Appeal D	Land East of King Hill	East Of Clare Park Estate New Road East Malling (110 Units)	Land West Of Winterfield Lane East Malling (250 Units)	South Of London Road And East Of Hermitage Lane Aylesford (840 units)	Brampton Field, Dilton Edge (300 Units)	C2 sites conversion to C3	Planning Permissions expired 01/04/22 - 30/11/22	Completions from Planning Permissions (Net)	Total Completions	5 Year Totals	5 Year Supply 2022/23-2026/27
2011/12	119					100		113												444	444	2,845	
2012/13	151					59		30												394	394		
2013/14	257					12		149												608	608		
2014/15	267					43		60												487	487		
2015/16	441					64		319												912	912		
2016/17	436					60	13	142												830	830	3,375	
2017/18	616					101	139	48												1,166	1,166		
2018/19	135				29	61	60	39										33		455	455		
2019/20	118	-30			95	78	202	10	-2									6		477	477		
2020/21	166	-9			120	47	103	14	0									6		447	447		
2021/22	177	-30			100	1	160	26	-1				34					0		467	467		
2022/23	281	-12	0	0	76		87	101	-1		4		39	57				32	-11	653	653	3,312	3,227
2023/24	202	-60	0	0	75		80	47		26	43	12	47	53	43	68	22	79		737	737		
2024/25	365	-14	0	0	68		94	104		24	43	20			43	68	43	43		901	901		
2025/26	65		70	0	68		94	2		20	43	38			43	68	43			484	554		
2026/27	81		70	0	4		27	3			43				43	68	43			312	382		
2027/28	27		70	114							34				43	68	43			215	399	1,678	
2028/29			70	114											35	68	43			146	330		
2029/30			70	114												68	43			111	295		
2030/31			70	114												68	20			88	272		
2031/32			70	114												68				68	252	1,330	
2032/33			70	114												68				68	252		
2033/34			70	114												68				68	252		
2034/35			70	114												68				68	252		
2035/36			70	228												24				24	322		
2036/37			70	228																0	298	1,192	
2037/38			70	228																0	298		
2038/39			70	228																0	298		
2039/40			70	228																0	298		
Totals	3,904	-155	1,050	2,052	635	626	1,059	1,207	-4	70	210	70	120	110	250	840	300	199	-11	10,630	13,732	13,732	3,227
																					5 yr Housing Requirement (4)		5,010
																					Difference		-1,783
																					5-Year Supply (5)		64%
																					No. of years of HLS (6)		3.22

Note (1) Excluding listed large sites & Tonbridge Town Centre
Note (2) Windfall projection from small sites (fewer than five units in capacity).
Note (3) Windfall projection from large sites (Five units or more in capacity).
Note (4) Housing requirement generated by the standard method (2022-based, 835 dpa) + a 20% buffer
Note (5) Supply of housing sites as a % of the 5-year housing requirement (see footnote (4))
Note (6) Number of years of Housing Land Supply (HLS) measured against annualised housing requirement (835) + 20% buffer (see footnote (4))

Appendix A – Extant Planning Permissions as at 31 March 2022

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Site Application	Address	Proposal	Total Number of Units on Permission	Demolitions	Site Status	Not Started - Gain	Under Construction - Gain	Not Started - Loss	Phasing 2022 to 23	Demolition 2022 to 23	Phasing 2023 to 24	Demolition 2023 to 24	Phasing 2024 to 25	Demolition 2024 to 25	Phasing 2025 to 26	Demolition 2025 to 26	Phasing 2026 to 27	Demolition 2026 to 27	Phasing 2027 to 28	Demolition 2027 to 28	Phasing 2028 to 29	Demolition 2028 to 29	Phasing 2029 to 30	Demolition 2029 to 30	Phasing 2030 to 31	Demolition 2030 to 31	Phasing 2031 to 32	Demolition 2031 to 32	Phasing 2032 to 33	Demolition 2032 to 33	Phasing 2033 to 34	Demolition 2033 to 34	Phasing 2034 to 35	Demolition 2034 to 35	Phasing 2035 to 36	Demolition 2035 to 36
									Phasing 2022 to 23		Phasing 2023 to 24		Phasing 2024 to 25		Phasing 2025 to 26		Phasing 2026 to 27		Phasing 2027 to 28		Phasing 2028 to 29		Phasing 2029 to 30		Phasing 2030 to 31		Phasing 2031 to 32		Phasing 2032 to 33		Phasing 2033 to 34		Phasing 2034 to 35		Phasing 2035 to 36	
		Extant C3 Totals Year by Year (Gross-Demo)							632		658		858		484		312		215		146		111		88		68		68		68		68		24	
C2 Permissions																																				
									Phasing 2022 to 23	Demolition 2022 to 23	Phasing 2023 to 24	Demolition 2023 to 24	Phasing 2024 to 25	Demolition 2024 to 25	Phasing 2025 to 26	Demolition 2025 to 26	Phasing 2026 to 27	Demolition 2026 to 27	Phasing 2027 to 28	Demolition 2027 to 28	Phasing 2028 to 29	Demolition 2028 to 29	Phasing 2029 to 30	Demolition 2029 to 30	Phasing 2030 to 31	Demolition 2030 to 31	Phasing 2031 to 32	Demolition 2031 to 32	Phasing 2032 to 33	Demolition 2032 to 33	Phasing 2033 to 34	Demolition 2033 to 34	Phasing 2034 to 35	Demolition 2034 to 35	Phasing 2035 to 36	Demolition 2035 to 36
18/02137/FL	Harpwood Residential Home Seven Mile Lane Wrotham Heath Sevenoaks Kent TN15 7RY	Demolition of existing care home building (use class C2) and erection of a replacement care home (use class C2) with associated car parking, refuse and external landscaping	19	0	UC	0	19	0	19		0		0		0																					
19/02431/RM	Land Rear Of 239 To 259 London Road West Malling Kent	Reserved Matters Application: Details of appearance, landscaping, layout and scale pursuant to planning application TM/17/00506/OA (Outline application: The development of land to the rear of London Road to consist of the development of an extra care	42	0	UC	0	42	0	0		42		0		0																					
20/00341/FL	140 Tonbridge Road Hildenborough Tonbridge Kent TN11 9HJ	Demolition of existing garage and associated buildings and structures and the erection of a 75-bed care home (use class C2) with car parking	40	0	UC	0	40	0	0		0		40		0																					
17/03513/FL/C2	Land West Of Hermitage Lane And East Of Units 4A 4B And 4C Mills Road Quarry Wood Industrial Estate Aylesford Kent	Hybrid Planning Application: Hybrid Planning Application: PHASE 2 Full planning permission for the redevelopment of the site to provide 24 Assisted Living Apartments C2 use	13	0	UC	0	13	0	13		0		0		0																					
20/01414/FL	Development Site At The Hermitage Hermitage Lane Maidstone Kent	Demolition of existing buildings and construction of new 70 Bed Care Home	37		NS	37					37		0																							
21/02567/FL	Duchess Of Kent Court Hall Road Aylesford Kent	Ground floor extensions with first floor extension creating 5 additional units, larger communal space, and two additional parking spaces	3		NS	3							3																							
		C2 to C3 Conversion Total Extant	154	0		40	114	0	32	0	79	0	43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
									22/23		23/24		24/25		25/26		26/27		27/28		28/29		29/30		30/31		31/32		32/33		33/34		34/35		35/36	
		Grand Total (C3 + C2)	3954			3558	483	-87	664		737		901		484		312		215		146		111		88		68		68		68		68		24	