

# Tonbridge & Malling Borough Council

## Housing Land Supply Position as at 31 March 2023

### 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 2023.
- 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 need<sup>1</sup>. This method starts with the 2014-based household projections published by the Office for National Statistics (ONS)<sup>2</sup> and takes account of factors such as housing affordability<sup>3</sup>.
- 2.2 The outcome of this process is a housing need figure (as at 2023) of **835 dwellings per annum** (dpa) or 4,175 dwellings over the five-year period (1/04/23 – 31/03/28). 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.

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

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

<sup>3</sup> 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 2022. 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 2023-2028. 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 2023-2028 includes the following components:
- Extant permissions as at 31 March 2023 (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 2023. 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 Government<sup>4</sup>. 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 **Extant permissions: phasing** – The phasing of extant permissions was informed by local and national evidence on Build Out Rates (BORs).
- 3.4 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 1 (below). The Housing Market Delivery Study forms part of the emerging Local Plan evidence base<sup>5</sup>.

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<sup>4</sup> [Planning practice guidance on housing supply and delivery](#), para. 035, ref ID: 68-035-20190722

<sup>5</sup> [Local Plan \(Regulation 18\) consultation evidence base – Tonbridge and Malling Borough Council \(tmhc.gov.uk\)](#)

**Table 1: 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

- 3.5 The BORs were also checked by the piece of research *Start to Finish* (second edition, February 2020)<sup>6</sup> prepared by Lichfields. This piece of research looked at sites across England and Wales (outside of London). Table 2 highlights the findings of this research:

**Table 2: 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

- 3.6 **Windfall allowance** – The housing projection for the five-year period 01/04/23 to 31/03/28 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

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<sup>6</sup> [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)

evidence base for the emerging Local Plan<sup>7</sup>. It considers trend data from 2008/09 onwards and excludes data from garden development in built-up areas. Table 3 highlights the trend data.

**Table 3: Small sites windfall data (2008/09 – 2022/23)**

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
2021-22	52
2022-23	61
<b>Annual Average</b>	<b>67</b>

- 3.7 The average annual supply during the trend period (67 units) has only been included from year four of the projection period onwards to avoid double counting of commitments during the early years.
- 3.8 A windfall allowance for large sites (five units or more) is not included in the five-year projection period from 01/04/23. However, a windfall allowance for large sites is factored in after this period, as explained in the *Windfall Allowance Methodology Paper*. The reason

<sup>7</sup> [Local Plan \(Regulation 18\) consultation evidence base – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk/consultation/evidence-base)

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. Table 4 highlights the trend data

**Table 4: Large sites windfall data (2008/09 – 2022/23)**

<b>Year</b>	<b>Totals (net)</b>
<b>2008-09</b>	817
<b>2009-10</b>	331
<b>2010-11</b>	299
<b>2011-12</b>	397
<b>2012-13</b>	288
<b>2013-14</b>	500
<b>2014-15</b>	369
<b>2015-16</b>	693
<b>2016-17</b>	569
<b>2017-18</b>	953
<b>2018-19</b>	332
<b>2019-20</b>	380
<b>2020-21</b>	356
<b>2021-22</b>	396
<b>2022-23</b>	418
<b>Annual Average</b>	473
<b>Discount ed by 50%</b>	237

## 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 **3.47 years of housing land supply** between 1 April 2023 and 31 March 2028. This position is summarised in Table 5. The full list of extant planning permissions as at 31 March 2023, 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, applies<sup>8</sup>.
- 5.2 The Council is taking positive steps to get an up-to-date Local Plan in place. Consultation took place on a regulation 18 local plan in Autumn 2022. The Regulation 18b second stage is due in Spring 2024, and it is the intention to consult on the Regulation 19 Plan in Winter 2024. It is then the intention to submit to the Secretary of State (Reg 22) in April 2025. This timetable is set out in the new Local Development Scheme:

<https://www.tmbc.gov.uk/local-plan/local-development-scheme>

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<sup>8</sup> [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 2023**

Standard method housing requirement of 835 dwellings per annum (dpa)

- Projected housing land supply for the 5 year period from 1 April 2023 to 31 March 2028

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	Land South West Of London Road And West Of Castor Park Allington (106 units)	Land North West Of Bell Lane Burham Rochester Kent (58 Units)	Dilton Common (118 units)	East Of Clare Park Estate New Road East Malling (110 Units)	Land West Of Winterfield Lane East Malling (250 Units)	Land North Of Lower Haysden Lane Tonbridge Kent (125 Units)	South Of London Road And East Of Hermitage Lane Aylesford (840 units)	Oakhill House 130 Tonbridge Road Hildenborough Tonbridge (171 units)	Brampton Field, Dilton Edge (300 Units)	Land South Of Barming Station And East Of Hermitage Lane Aylesford Kent (330 units)	C2 sites conversion to C3	Completions from Planning Permissions (Net)	Total Completions	5 Year Totals	5 Year Supply 2023/24-2027/28			
2011/12	119					100		113																	444	444		2,845			
2012/13	151					59		30																	394	394			3,375		
2013/14	257					12		149																	608	608				3,472	
2014/15	267					43		60																	487	487					3,472
2015/16	441					64		319																	912	912					
2016/17	436					60	13	142																		830	830		3,472		
2017/18	616					101	139	48																		1,166	1,166			3,472	
2018/19	135				29	61	60	39																33	455	455		3,472			
2019/20	118	-30			95	78	202	10	-2															6	477	477					3,472
2020/21	166	-9			120	47	163	14	0															6	447	447		3,472			
2021/22	177	-30			100	1	160	26	-1				34											0	467	467			3,472		
2022/23	184	-16	0	0	100		141	1					33				49								32	524	524			3,472	
2023/24	184	-65	0	0	51		68	103		70	4		53				43	43		68	14	22		79	737	737		3,472			
2024/25	243	-19	0	0	68		80	135									18	43		68	56	43		43	948	948			3,472		
2025/26	249	-4	0	0	68		93	27										43	39	68	35	43		37	806	806					3,472
2026/27	27		67	0	4			0									43	43	68	39	43	43			438	505					
2027/28	56		67	0													43	43	43	68	27	43	43		409	476		3,472			
2028/29	0		67	118							34					32		35		68		43	43		255	440			3,472		
2029/30	0		67	118																68		43	43		154	339				3,472	
2030/31			67	118																68		20	43		131	316					3,472
2031/32			67	118																68			43		111	296					
2032/33			67	118																68			43		111	296		3,472			
2033/34			67	118																68			29		97	282			3,472		
2034/35			67	118																68					68	253				3,472	
2035/36			67	237																24					24	328					3,472
2036/37			67	237																					0	304		3,472			
2037/38			67	237																					0	304			3,472		
2038/39			67	237																					0	304				3,472	
2039/40			67	237																					0	304					
Totals	3,826	-173	938	2,011	635	626	1,059	1,216	-3	70	210	70	120	106	58	118	110	250	125	840	171	300	330	236	11,500	14,449	14,449	3,472			

[illegible]





**Appendix A – Extant Planning Permissions as at 31 March 2023**