
UPDATED Housing Land Supply Position

Briefing Note

January 2025

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1. Introduction

- 1.1 This briefing note has been prepared to provide an update of the current housing land supply position as a result of the publication of the new National Planning Policy Framework (NPPF) on 12 December 2024 [National Planning Policy Framework - GOV.UK](#).
- 1.2 This briefing highlights the changes to the methodology in relation to the calculation of housing land supply and how this impacts on Tonbridge and Malling Borough Council's (TMBC) Housing Land Supply (HLS).
- 1.3 The Council produced an updated housing land supply position as at 31 October 2024 which identified that the Council could not demonstrate a five-year housing land supply. The Housing Land Supply Position Statement was published on Monday 25 November 2024. The Position Statement indicated that there was a 3.97 year supply. For detailed information on the Housing Land Supply Position refer to the TMBC Housing Land Supply Position as of 31 October 2024 [LDF - housing land supply position – Tonbridge and Malling Borough Council](#)
- 1.4 However, following the publication of the revised NPPF on 12 December 2024, a new local housing need has been assigned to TMBC. This has resulted in an uplift for the requirement for TMBC from 820 dwellings per annum (dpa) (requirement in 2023) to 1,096 new homes per annum (requirement in 2024). **Table 1** below sets out the Government's housing requirements for TMBC including setting out the increase.

Table 1: Government's housing requirements for TMBC

Government's housing requirements for TMBC	Housing requirement figure	Housing requirement percentage change
Current plan requirement	425	
Standard method (pre Dec`24)	820	
Change from current Local Plan (%)	-	158 %
Standard method (proposed July 24)	1 057	
Change from standard method (pre Dec`24) (%)	-	34 %
Standard method (adopted Dec`24)	1 096	
Change from standard method (proposed July 24) (%)	-	4 %

2. Housing Land Supply

- 2.1 In accordance with the NPPF and as the adopted Local Plan policies are more than five years old, there is a requirement to make an assessment against the local housing need. The principal measure of performance, in terms of housing supply, is the Government's standard method for calculating housing need. The new method provided by central Government aims to boost housing numbers by pinning targets to existing housing stock (rather than household projections, as per the former method) and then uplifting needs, and the target, based on affordability (using a three-year average).
- 2.2 The old Standard Method (SM) is based on a four-step approach for each Local Authority Area (LAA):
1. Using the 2014-based household projections, take the 10 year average growth rate (with the current year being the base year);
 2. Apply an uplift, based on the latest median workplace-based affordability ratio (formula set out in national guidance);
 3. Apply a cap, where appropriate. Where the strategic policies for housing in the current plan are less than five years old, cap the need (from steps [1] and [2]) at 40% above the current plan requirement. Where more than five years old, cap the need at 40% above whichever is higher of the current plan requirement or household projections; and
 4. [For the 20 largest urban areas nationally] – apply a further 35% uplift to step [3].

The new mandatory SM adopts a two-step approach for each LAA:

1. Take 0.8% of the current housing stock of the area;
 2. Apply an uplift, based on a three-year average of the median workplace-based affordability ratio, with an increase of 15% for every unit above four.
- The urban uplift for the largest 20 urban areas has been removed.

- 2.3 The NPPF advises that Councils should demonstrate a five-year supply of deliverable sites. The definition of a 'Deliverable' site is set out in the NPPF.
- 2.4 The level of evidence required to demonstrate deliverability varies according to the scale, type of permission and planning status of the site. As part of the updated HLS (published November 2024), the council has undertaken various steps to demonstrate that the sites included in the supply are deliverable housing sites.
- 2.5 The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- a) 5% to ensure choice and competition in the market for land; or
 - b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.
- 2.6 Apart from the new housing figure, and in reviewing the 5-year housing land supply position once more, only the supply position at Land at Aylesford Quarry needed to be updated, to provide the figure below. In this regard, TMBC's updated position is that Land at Aylesford Quarry is deliverable and should remain in the 5 yr housing supply for TMBC, but proposes to push the delivery phase for this site back by one year to 2026/27. Using the new NPPF housing requirement including the 20% buffer with the Aylesford Quarry phase pushed back to 2026/27 the current position indicates the 5 yr Housing Land Supply as 2.89 years.

Table 2: Summary of the HLS October 2024 and HLS December 2024

	HLS as at October 2024 (using old SM)	HLS as at December 2024 (using new SM)
5 yr housing total	3 918	3 804
5yr housing requirement	4 932	6 576
Difference	-1 014	-2 771
5 year supply percentage	79%	58%
No. of years of HLS	3.97	2.89

3. Conclusion

- 3.1 The current position is a **2.89 years housing** supply, based upon the housing need of 1,096 dpa plus a 20% buffer, against the requirements of the NPPF December 2024. This means that the council has a shortfall and is not able to demonstrate the five-year housing land supply requirement.
- 3.2 A shortfall in housing land supply means that when applications for housing come forward the 'presumption in favour of sustainable development' applies in decision-making, which in this context means that less weight is given to development plan policies to help resolve supply issues moving forward. However, this does not mean that every housing application should be granted permission. Careful consideration will need to be given to the merits of each case and appropriate weight afforded to development plan policies when determining applications.
- 3.3 The Council is therefore progressing with the preparation of a new Local Plan within the timeframe put forward by the Government, which is to submit a Local Plan no later than 12th December 2026. Setting aside the practical and market challenges, until the Local Plan is in place, housing supply will be monitored against the target set in the Government's latest standard method, which will be refreshed each year.

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