OCTOBER 2025

Tonbridge and Malling

Strategic Housing Market Assessment

Final Report

Iceni Projects Limited on behalf of

Tonbridge and Malling Borough Council

October 2025

ICENI PROJECTS LIMITED ON BEHALF OF TONBRIDGE AND MALLING BOROUGH COUNCIL

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FINAL REPORT

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1.3 The overall aim of the study is to provide robust and proportionate evidence to inform the development of the Local Plan with regard to housing needs and requirements, and related policies. The Local Plan covers the period 2024 to 2042.

Housing Stock

1.4 As of 2021, the area contained 55,487 dwellings and 53,536 households, resulting in an approximate 3.5% vacancy rate.

1.5 Housing delivery since 2015/16 has averaged 242 dwellings annually, but this rate has increased significantly to 483 since 2021/22.

1.6 The housing stock in Tonbridge and Malling is characterised by a much higher proportion of semi-detached properties (41.9%) compared to Kent, the South East, and England.

1.7 The Borough also has a relatively high level of owner-occupation (72.1%), significantly exceeding wider comparators.

1.8 Looking at occupancy reveals a relatively high level of underoccupancy in Tonbridge and Malling overall (42.1%) compared to Kent and the South East Region and low levels of overcrowding.

Housing Market

1.9 In the year to September 2024, the median property price in Tonbridge and Malling was £390,000, exceeding the regional and national equivalents.

1.10 Median prices have increased by 57.6% over the last 10 years. This increase is below the regional growth and above the national growth.

1.11 As with all areas, affordability has significantly deteriorated in the last 20 years, although there have been some recent improvements. Despite this, median prices are now over 11 times the median earnings of those working in the borough.

1.12 There has been a notable fall in the number of sales in the borough (since 2020), but this is reflecting macroeconomic issues around interest rates and cost-of-living issues.

Private Rented Sector

1.13 The private rental sector (PRS) makes an important contribution to the housing market, including individuals with an affordable housing need.

1.14 As of the year ending April 2025, median monthly rents in Tonbridge and Malling stood at £1,370, higher than the regional and national medians.

1.15 In the last 5 years, rents have increased by around 28%, which is a slight acceleration from the previous 5 years.

1.16 In November 2024, a total of 2,113 households in Tonbridge and Malling were supported by benefits. This is despite a clear disconnect between Local Housing Allowance (LHA) rates and current median rental costs.

1.17 The latest Statistics suggest that there were 37 licensed Housing in Multiple Occupation (HMOs) in Tonbridge and Malling. Unlicensed HMOs are estimated to be higher at 165.

1.18 The small number of HMOs in the area does not indicate a need to introduce additional planning controls, such as Article 4 Directions (A4Ds), to limit them.

1.19 There are currently 2 single-family build-to-rent schemes in Tonbridge and Malling. This and the small number of developments in neighbouring local authorities indicate growing demand.

1.20 In recognition of the potential growth of the sector, the Council may consider including a policy on Build-to-Rent development to set out its expectations on how these sites should look and operate, including how affordable housing policies would be applied.

Overall Housing Need

1.21 Prior to May 2025, the Standard Method for assessing housing need set a figure of 1,090 dwellings per annum for Tonbridge and Malling. Since May 2025 that number was increased to 1,097 dwellings per annum.

1.22 As this report was largely completed in April 2025, the analysis in this report is based on a housing need figure of 1,090 dpa. As this is only a marginally lower number, the analysis herein remains valid for policy making.

1.23 A key reason for the Government seeking higher housing figures is that worsening affordability is evidence that supply is failing to keep up with demand.

1.24 We have developed population projections linked to the delivery of 1,090 dpa across the plan period to 2042. This shows that population growth in the borough could exceed 42,500 people. This would not materially change with the updating of the housing need figure to 1,097 dpa.

1.25 This population growth is around triple the rate of projections based on the last 5 years, a period when housing delivery has been high.

1.26 Taking into account economic activity rates, this level of population growth would also support up to 27,500 jobs.

1.27 In moving forward, this report bases key analysis on this level of population growth (e.g. analysis around housing mix and older person needs).

Affordable Housing Need

1.28 The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income.

1.29 The evidence indicates that there is an acute need for affordable housing in the Borough and a need in all sub-areas.

1.30 The majority of need is from households who are unable to buy OR rent and therefore points particularly towards a need for affordable or social rented housing rather than affordable home ownership.

1.31 Despite the level of need being high, it is not considered that this points to any requirement for the Council to increase the Local Plan's overall housing requirement due to affordable needs.

1.32 That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.

1.33 The analysis suggests there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and possibly also for some households who claim full Housing Benefit.

1.34 It is, however, clear that social rents are more affordable and could benefit a wider range of households – social rents could therefore be prioritised where delivery does not prejudice the overall delivery of affordable homes.

1.35 Shared Ownership is likely to be a suitable Affordable Home Ownership (AHO) product for households with more marginal affordability (those only just able to afford to privately rent but not to buy outright) as it has the advantage of a lower deposit and subsidised rent. There was no strong evidence of a need for First Homes or discounted market housing with evidence suggesting that Shared Ownership is likely to be a more affordable AHO product.

1.36 In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Council will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).

1.37 The evidence would justify a policy position of 80% low cost rented and 20% affordable home ownership homes. The evidence indicates that up to 60% of rented affordable housing at social rents could be justified in need terms (therefore about 50% of all affordable housing). Low cost home ownership provision should focus on shared ownership, with no strong evidence of a need for First Homes or discounted market housing identified.

1.38 Overall, the analysis identifies a notable need for affordable housing, and it is clear that the provision of new affordable housing is an important and pressing issue in the area.

1.39 It does, however, need to be stressed that this report does not provide a definitive affordable housing target that should be proscribed by the Council on sites across Tonbridge and Malling. This is due to limitations in the amount of affordable housing that can viably be delivered on individual sites. The evidence does, however, suggest that affordable housing delivery should be maximised where opportunities arise.

Need for Different Sizes of Homes

1.40 Analysis of the future mix of housing required takes account of demographic change, including potential changes to the number of family households and the ageing of the population.

1.41 The proportion of households with dependent children in Tonbridge & Malling is above average, with around 32% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally).

1.42 There are notable differences between different types of households, with married couples (with dependent children) seeing a high level of owner-occupation, whereas lone parents are particularly likely to live in social or private rented accommodation.

1.43 There are a range of factors which will influence demand for different sizes of homes, including demographic changes, future growth in real earnings and households' ability to save, economic performance and housing affordability.

1.44 The analysis linked to future demographic change concludes that the following table represents an appropriate mix of affordable and market homes.

Table 1.1 Suggested size mix of housing by tenure – Tonbridge & Malling

	Market	Affordable home ownership	Affordable housing (rented)
1-bedroom	10%	20%	25%
2-bedrooms	30%	45%	35%
3-bedrooms	40%	25%	30%
4+-bedrooms	20%	10%	10%

Source: Iceni Projects

1.45 These recommendations take account of both household changes and the ageing of the population, as well as seeking to make more efficient use of new stock by not projecting forward the high levels of under-occupancy (which is notable in the market sector).

1.46 In all sectors, the analysis points to a particular need for 2- and 3-bedroom accommodation, with varying proportions of 1- and 4+-bedroom homes.

1.47 For rented affordable housing, there is a clear need for a range of different sizes of homes, including 40% to have at least 3 bedrooms, of which 10% should have at least 4 bedrooms.

1.48 The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households.

1.49 Also recognised is the limited flexibility which 1-bedroom properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure, and also the size requirements shown on the Housing Register.

1.50 The mix identified above could inform strategic policies, although a flexible approach should be adopted. For example, in some areas, private registered providers find difficulties selling 1-bedroom affordable home ownership (AHO) homes, and therefore, the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation.

1.51 That said, given current house prices, there are potential difficulties in making (larger) AHO genuinely affordable.

1.52 Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. Viability should also be taken into account when negotiating affordable housing on individual sites, for example developments that are only seeking to provide 1-2 bed homes are unlikely to be able to deliver 3-4 bedroom homes.

1.53 The Council should also monitor the mix of housing delivered.

Older and Disabled People

1.54 Tonbridge & Malling has a similar age structure in terms of older people as is seen regionally and nationally, but lower levels of disability compared with the national average.

1.55 The older person population shows high proportions of owner-occupation, and particularly outright owners who may have significant equity in their homes (75% of all older person households are outright owners).

1.56 The older person population is projected to increase notably moving forward. An ageing population means that the number of people with disabilities is likely to increase. Key findings for the 2024-42 period in Tonbridge and Malling include:

- a 38% increase in the population aged 65+ (potentially accounting for 24% of total population growth);
- a 51% increase in the number of people aged 65+ with dementia and a 45% increase in those aged 65+ with mobility problems;
- a need for around 950 additional housing units with support (sheltered/retirement housing) – split roughly equally between market and affordable housing;
- a need for around 220 additional housing units with care (e.g. extra-care) – the majority (around 70%) in the market sector. The need and supply of housing with care currently looks to be fairly balanced.
- a need for additional nursing and residential care bedspaces (around 720 in the period); and
- a need for around 450 dwellings to be for wheelchair users (meeting technical standard M4(3)).

1.57 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair-user dwellings, as well as providing specific provision of older persons housing.

1.58 Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) – wheelchair user dwellings in the market sector (a higher proportion of around 10% in the affordable sector).

1.59 Where the authority has nomination rights on properties, the supply of M4(3) dwellings would be constructed for immediate occupation (M4(3)(B) wheelchair-accessible dwellings (), and in the market sector, they should constructed to be adjustable for occupation by a wheelchair user (M4(3)(A) wheelchair-user adaptable dwellings).

1.60 It should, however, be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

1.61 In framing policies for the provision of specialist older persons accommodation, the Council will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this, the viability of provision).

1.62 There may also be some practical issues to consider, such as the ability of any individual development to have mixed tenure, given the way care and support services are paid for.

Specific Groups

1.63 In Tonbridge and Malling, at the end of the latest monitoring period (Base Period), a total of 202 households/individuals had registered on the self-build register. The cumulative need the council must have met by October 30th 2024, is 184 entries. This will rise to 194 on October 30th, 2025.

1.64 Our analysis identifies a current supply shortfall of 101 plots as of October 30th, 2024, which would increase to 111 by October 2025 if no further suitable permissions are granted.

1.65 The Council will need to meet this backlog as well as continue to meet the newly arising need on the register. This will be in the region of 22 plots per base period based on past trends although more recent trends are closer to 5 entries per base period.

1.66 As a general rule, the Council should be supportive of opportunities for Self and Custom build development within the Local Plan and could potentially require a proportion of plots on larger schemes to be marketed for Self or Custom Build use.

Children’s Homes

1.67 Kent County Council's (KCC) overarching vision for Children in Care is to ensure that all children have a place to call home. It is key for the Council that every child lives in a home that is right for their individual care needs.

1.68 There are currently no KCC-operated residential homes in Tonbridge and Malling.

1.69 KCC are hoping to provide c.10 new residential homes for children with complex needs across the County. These homes aim to serve needs of children currently in the system as well as those who many need it in future. Specific locations for these homes have not yet been identified and there is not yet a timescale to delivery. However, Children’s Services at KCC are keen to work closely with all Local Authorities within the M2/M20 corridor to identify sites and locations that may be suitable for use as a children’s residential home.

1.70 To ensure that KCC has access to any new provision, Tonbridge and Malling may wish to adopt a policy similar to that of Lancaster City, whereby any additional children's residential care home permission/licences are only permitted if the County Council get first refusal of placement.

1.71 The Council should also be generally supportive of new proposals for new children’s homes when they arise, homes should be in largely residential areas accessible to schools and services. In most cases new children’s homes will be existing C3 dwellings that are converted into C2 use.

Service Families

1.72 Ministry of Defence (MoD) location statistics show that in April 2024, there were no MoD personnel based in Tonbridge and Malling.

1.73 Overall, the presence of regular forces in TMBC is not considered to be significant and is unlikely to have any implications on local affordability, and therefore, there is no policy requirement for this group.

2. Introduction

2.1 Iceni Projects and Justin Gardner Consulting (JGC) have been jointly appointed by Tonbridge and Malling Borough Council (TMBC) to undertake a Strategic Housing Market Assessment.

2.2 The National Planning Policy Framework (NPPF) requires the preparation and review of local plans to be underpinned by relevant and up-to-date evidence and take into account relevant market signals. It sets out a framework through which development needs should be assessed, and this document responds to this framework and the related guidance.

2.3 The overall aim of the study is to provide robust and proportionate evidence to inform the development of the Local Plan with regard to housing needs and requirements, and related policies. The Local Plan covers the period 2024 to 2042.

Timing of this Report

2.4 This report was largely prepared in April 2025 and is based on the available evidence at that time including the housing need number. In May 2025 the housing need number was updated but it was not considered to be materially different to alter the main findings of this report.

2.5 The report has also be subsequently updated to take account of more recent data in relation to self and custom build register. Again this was not considered to make a material difference to the outcomes of this report.

Housing Market Area

2.6 Paragraph 18 of the Planning Practice Guidance (PPG) relating to Plan Making [1] defines what a Housing Market Area (HMA) is and describes the approach local authorities should take when defining these. A housing market area is a "*geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work*."

2.7 The PPG goes on to add:

> *"These can be broadly defined by analysing:*
> - *The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas.*
> - *Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained (due to connections to families, jobs, and schools).*
> - *Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use)."*

2.8 The guidance sets out a range of suggested data sources for doing this. These include ONS data on internal migration and travel to work patterns, and Land Registry Price Paid data.

[1] Reference ID: 61-018-20190315

2.9 The now slimmed-down guidance notably omits any self-containment threshold for defining HMAs. This is unlike the previous version of the PPG, which stated that migration self-containment of "*typically 70 per cent*", excluding long-distance moves, can help identify a suitable HMA.

2.10 The scale of a Housing Market Area and its required self-containment rate is therefore less definitive, as long as it is identified using the approach in the PPG. However, the Government's previous advice remains of some relevance and the 70% threshold has become accepted industry best practice.

2.11 It is also worth noting that HMA boundaries do not stop and start at administrative boundaries. Despite this, it is often commonplace and sensible for housing market areas to be defined using local authority boundaries.

2.12 This is because many of the key datasets used in assessing housing need (such as affordability ratio) are only published at a local authority level. In many areas, a pragmatic response has therefore been to define HMAs at a local authority level.

2.13 These issues were touched upon in the Planning Advisory Services (PAS) Technical Advice Note on Objectively Assessed Housing Need and Housing Targets[2] (July 2015) which concluded that:

> *"it is best if HMAs, as defined for the purpose of needs assessments, do not straddle local authority boundaries. For areas smaller than local authorities, data availability is poor and analysis becomes impossibly complex."*

2.14 However, the Technical Advice Note notably adds that "this is not always possible, and it may be the case that some [local authority]

[2] https://www.local.gov.uk/sites/default/files/documents/objectively-assessed-need-9fb.pdf

areas, particularly those covering an expansive area, fall into more than one HMA.”

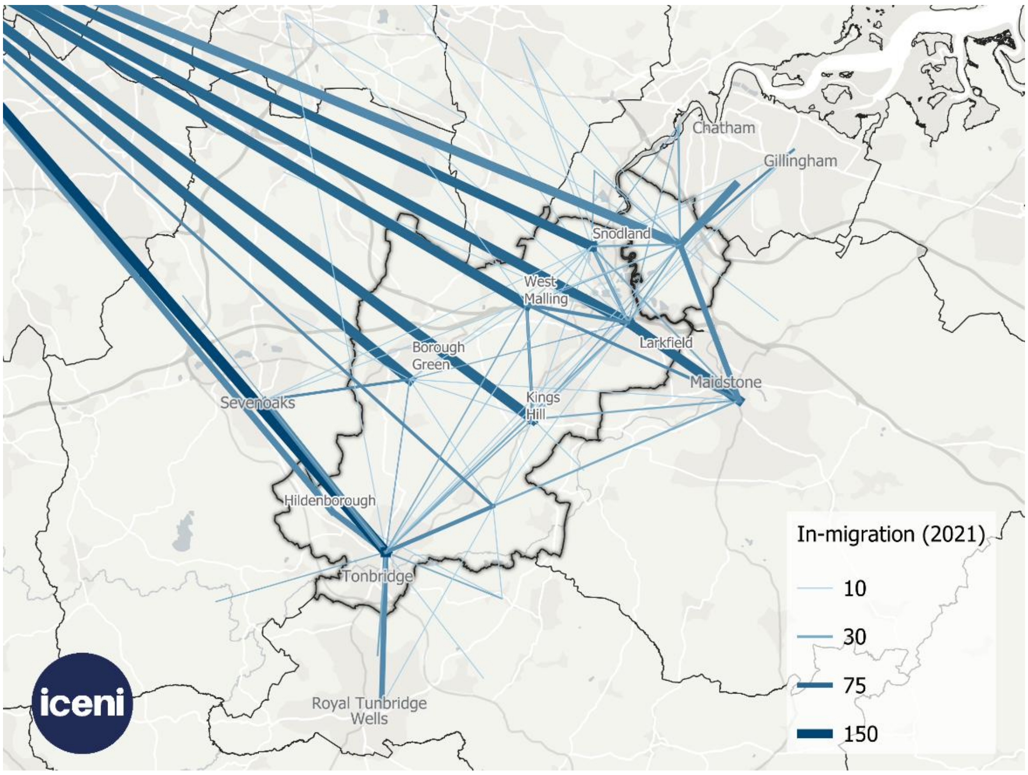
Migration

2.15 Looking at migration patterns in Tonbridge and Malling, the figure below shows the key migration inflows to the authority as registered in the 2021 Census.

2.16 While there is clear migration internally between areas of Tonbridge and Malling the overarching picture is of high levels of out-migration from Greater London to all parts of the Borough.

2.17 There are also some strong links from neighbouring areas, including from Maidstone and the Medway towns, into the north of the Borough. There is also a strong inflow from Royal Tunbridge Wells into Tonbridge.

Figure 2.1 Migration Inflows (2011)

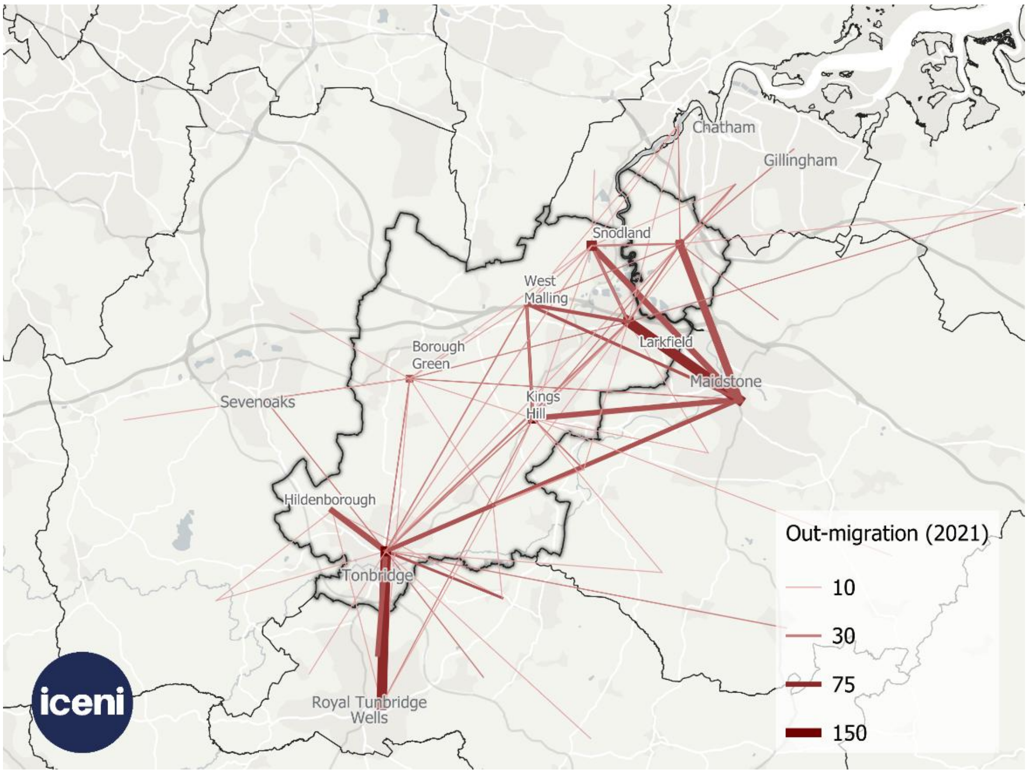


Source: Census 2021

2.18 Turning then to migration outflows, as the figure below shows, there is a similar pattern to the inflows with links from the north of the Borough to Maidstone (and from Tonbridge) and similarly from Tonbridge to Tunbridge Wells.

2.19 The map also shows a large number of smaller outflows to neighbouring areas such as Sevenoaks, Paddock Wood. Notably, there is less of an outflow to the Medway Towns than there is an inflow.

Figure 2.2 Migration Outflows (2011)



Source: Census 2021

2.20 We have aggregated these flows to a local authority area to firstly understand relationships, but secondly the appropriate HMA. Rather than the flows in either direction or the net flow (which can be misleading if there are equal two-way flows), we have focused on gross flows, which are the aggregate of the in and outflow.

2.21 It should be noted that larger cities (and other local authorities) with a large population also see larger in and outflows. Therefore, we have weighted the gross flows to account for the respective population size between the two areas.

2.22 Gross flows to/from Tonbridge and Malling are shown in the table below. As shown, the strongest absolute relationships are with Maidstone, followed by Tunbridge Wells and Sevenoaks. This then falls in scale to Medway, Gravesham and Dartford, before London Boroughs start to appear.

Table 2.1 Weighted Gross Migration to/from Tonbridge and Malling (2021)

	Gross Migration	Combined Population	Gross Migration Per Head
Maidstone	2,240	309,060	7.25
Tunbridge Wells	1,279	248,013	5.16
Sevenoaks	1,095	253,186	4.32
Medway	1,128	412,266	2.74
Gravesham	309	239,246	1.29
Dartford	281	249,182	1.13
Bromley	518	462,262	1.12

Source: ONS, Census 2021

2.23 This analysis presents a complex set of patterns but largely shows flows from the north,-west and to the east of Tonbridge and Malling. However, there are also clearly localised links with Maidstone, (Aylesford) Tunbridge Wells (Tonbridge) and Sevenoaks (Rural Areas such as Ivy Hatch) and to a much lesser degree Medway (Walderslade).

Self-Containment Rate

2.24 This section calculates self-containment rates using the 2021 Census. It should be noted that the 2021 Census was taken during a period of partial lockdown therefore, dynamics in both migration and commuting terms may be affected.

2.25 One of the previous benchmarks for identifying an HMA was self-containment levels, although this has subsequently been removed from the PPG. Self-containment rates are the percentage of moves to or from an area originating from the same area. The guidance suggested that a self-containment rate of 70% would be typical of an HMA.

2.26 The guidance also suggested long-distance moves should be excluded as these would include such things as people retiring to the area or moving for university, which would typically be outside of the HMA they reside.

2.27 We have used data from the 2021 Census, which reports on internal moves. In migration terms, 10,683 people moved from a home in Tonbridge and Malling in the year before the 2021 census, of these 4,258 moved to another home in the Borough. This equates to an origin self-containment rate of around 40%.

2.28 Alternatively, 11,147 people moved to Tonbridge and Malling in the year before the 2021 census, of these 4,259 moved from elsewhere in the Borough. This equates to a destination self-containment rate of around 38%.

2.29 However, if long-distance moves (defined as those outside of the county) are excluded, then the self-containment rates increase to 55% and 53%, respectively. How these figures are derived is set out in the table below.

Table 2.2 Self-Containment Rate (2021)

	Moves In	Moves Out
All Moves Out/In	11,147	10,682
Internal Moves	4,259	4,259
Self-Containment Rate	38%	40%
All Local Moves Out/In	8,021	7,743
Revised Self-Containment Rate	53%	55%

Source: ONS, Census 2021

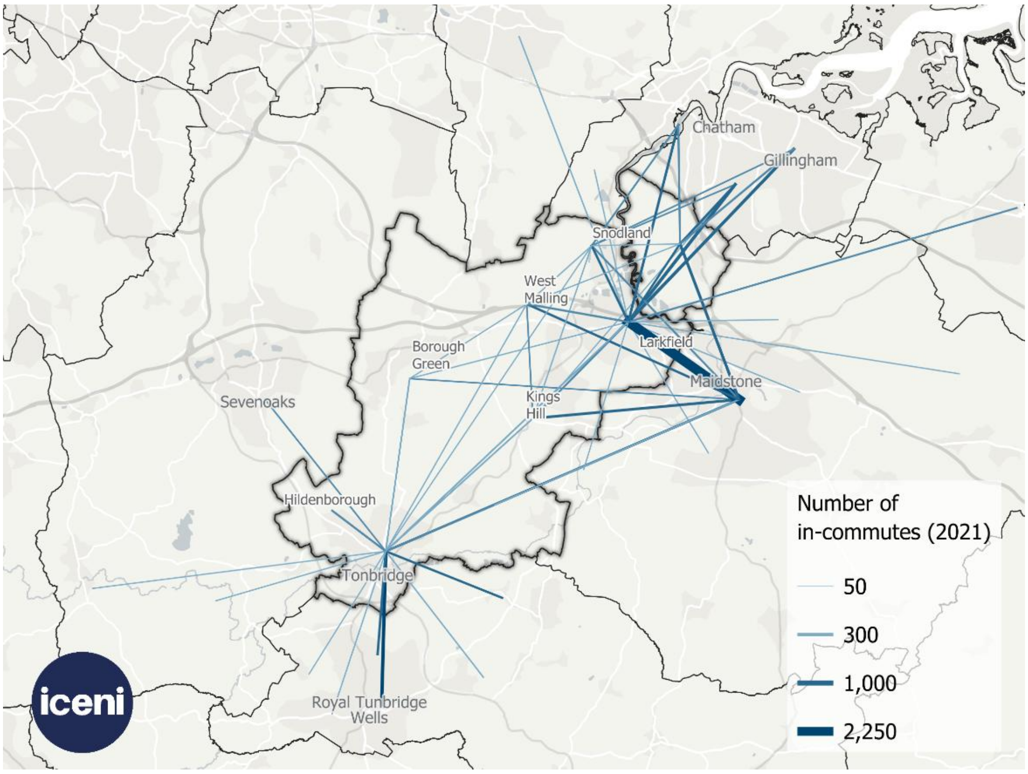
2.30 By this measure, Tonbridge and Malling is not meeting the 70% self-containment threshold, indicating that it should not be considered an HMA in its own right.

Commuting

2.31 Looking at In-Commuting the figure below demonstrates that Tonbridge and Malling attracts workers from a wide range of locations including Internally. The boroughs key employment locations are Malling, Kings Hill, Aylesford and Tonbridge.

2.32 There is also a strong level of commuting from neighbouring areas, particularly from Maidstone and the Medway towns into the industrial locations around Aylesford and to the Office Parks of Kings Hill. Tonbridge also sees a degree of in-commuting from Tunbridge Wells and Sevenoaks.

Figure 2.3 In-commuting (2021)



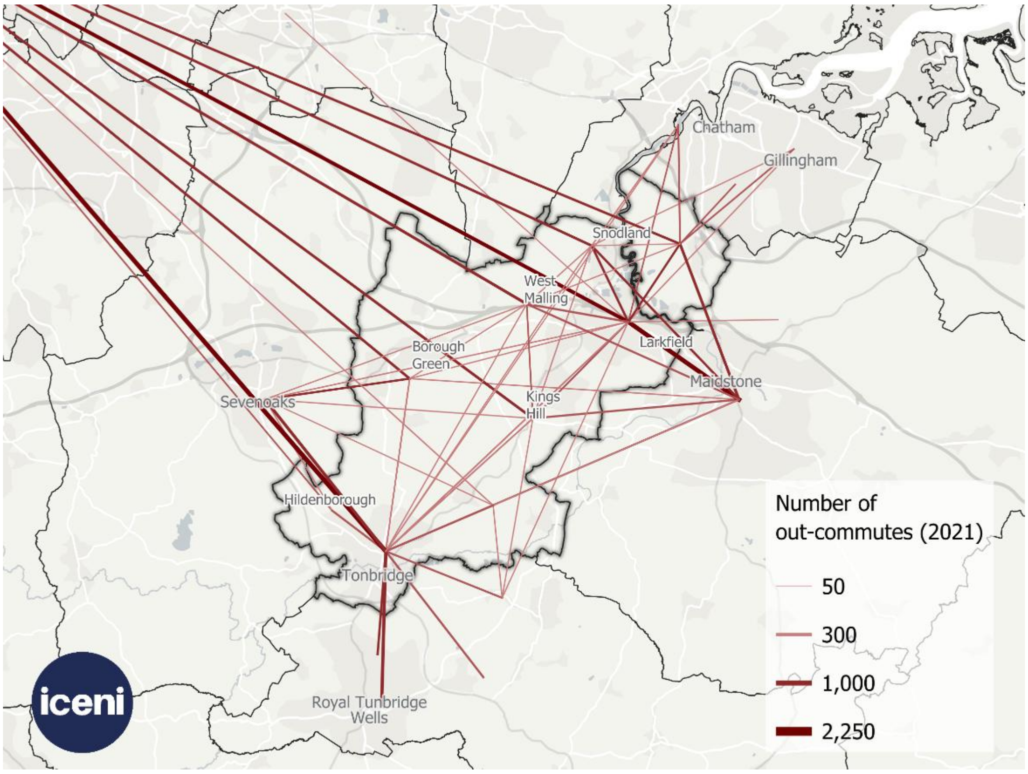
Source: Census 2021

2.33 Out-commuting patterns are dominated by links to London from all parts of the Borough. There are also some localised moves to Sevenoaks, particularly from the rural and southern parts of the Borough, including Tonbridge.

2.34 Tonbridge also sees out-commuting to Tunbridge Wells. The north of the Borough sees out-commuting to Maidstone, the Medway towns, and Gravesend.

2.35 Internally, there is also a north-south split within the Borough. Borough Green and Kings Hill both draw commuters from the North and South of the Borough, indicating a zone of transition.

Figure 2.4 Out-commuting (2021)



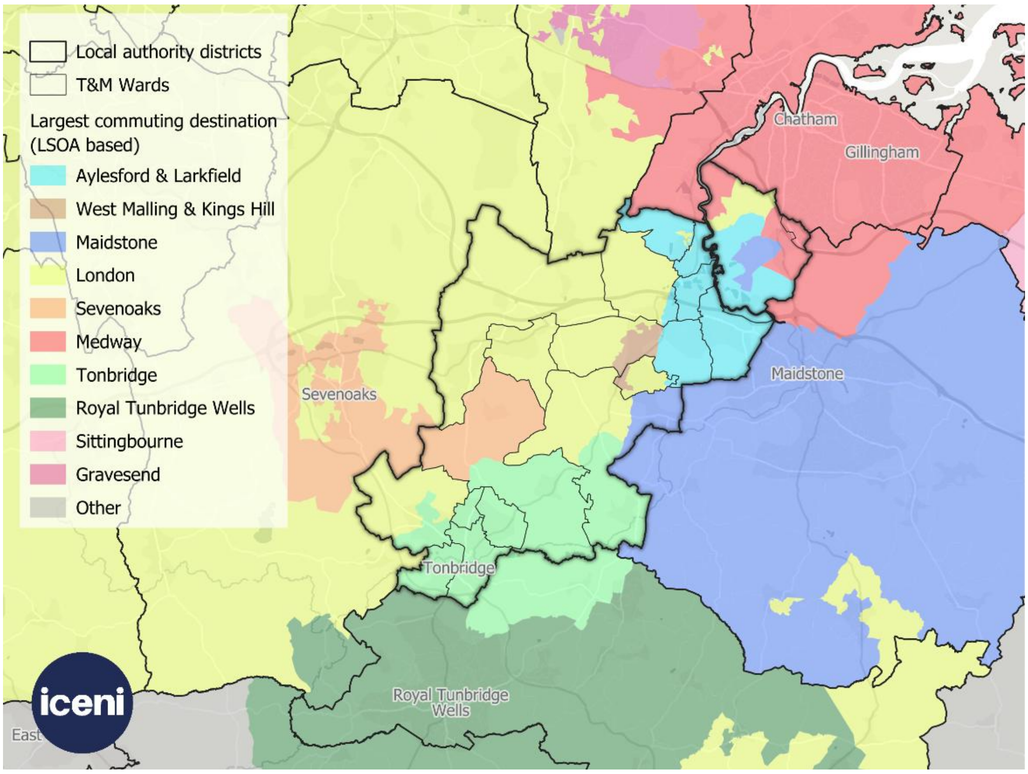
Source: Census 2021

2.36 Finally, we have sought to identify which of the major employment centres in and around Tonbridge and Malling draw the greatest number of commuters from each LSOA in the Borough and surrounding areas.

2.37 As shown, the influence of London extends to many parts of the Borough, particularly those to the west, including the rural areas. Tonbridge is the most influential employment centre for the south of the Borough, including parts of Tunbridge Wells.

2.38 The North of the Borough is particularly complex, with parts seeing the greatest number of commuters to London, Medway, and Maidstone. Although there is still a degree of internal movement, with large areas sending most commuters to Aylesford and Larkfield and to a lesser degree West Malling and Kings Hill.

Figure 2.5 Largest workplace destinations



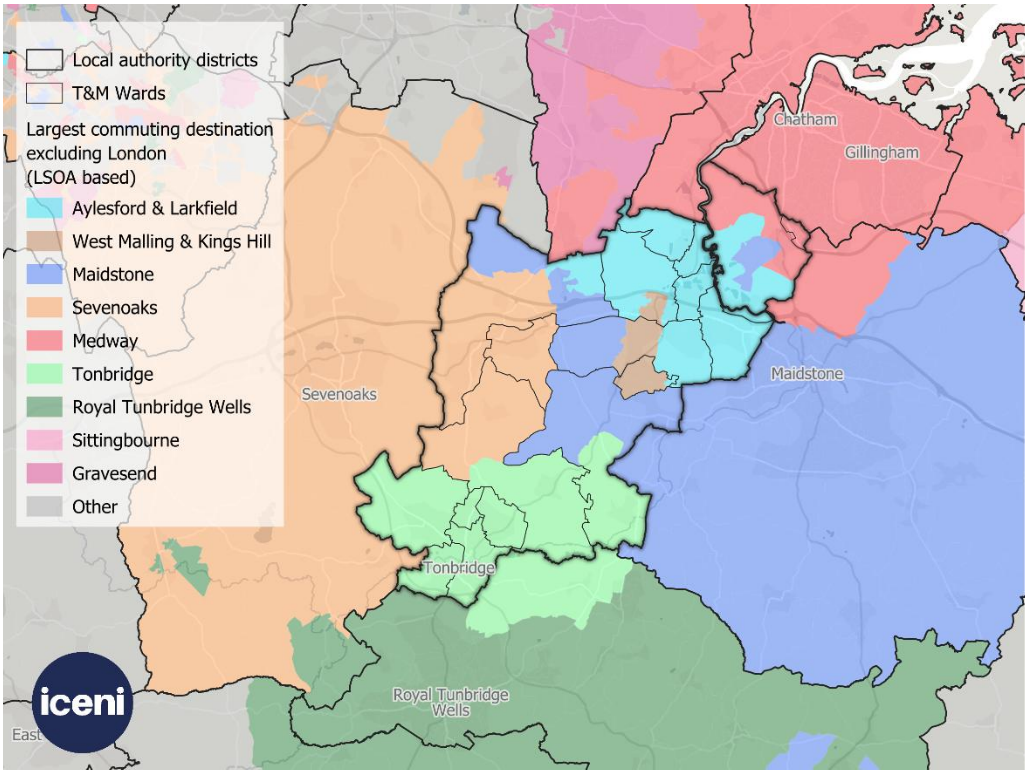
Source: Census 2021

2.39 A small part of the Borough also sees the greatest number of commuters going to Sevenoaks. However, when the influence of London is removed (see map below) Sevenoaks' influence becomes much clearer.

2.40 Other areas influence also become clearer with Tonbridge and Aylesford and Larkfield being the central employment centres in the North and South of the Borough. We also see the influence of the Medway towns on the very north of the Borough.

2.41 Although relatively small, the influence of West Malling and Kings Hill is also notable in its immediate surrounding area. We also see Maidstone's influence as an employment centre for those in the middle of the Borough increase.

Figure 2.6 Largest workplace destinations excluding London.



Source: Census 2021

2.42 Overall, the Borough sees a marginal level of net in-commuting (20,700 vs 19,200). Around 69% of the jobs in the borough are taken up by Tonbridge and Malling residents and 70% of residents in employment work within the borough. Again, it should be noted that this data reflects a period of partial lockdown in 2021.

Table 2.3 Commuting Self-Containment Rates (2021)

	Measure		Measure
All Working Residents	64,428	Working in TMBC	65,878
Working from Home	33,610	Working from Home	33,610
Living and Working in TMBC	11,585	Living and Working in TMBC	11,585
Resident Self-containment Rate	70%	Job Self-Containment Rate	69%

Source: Census 2021

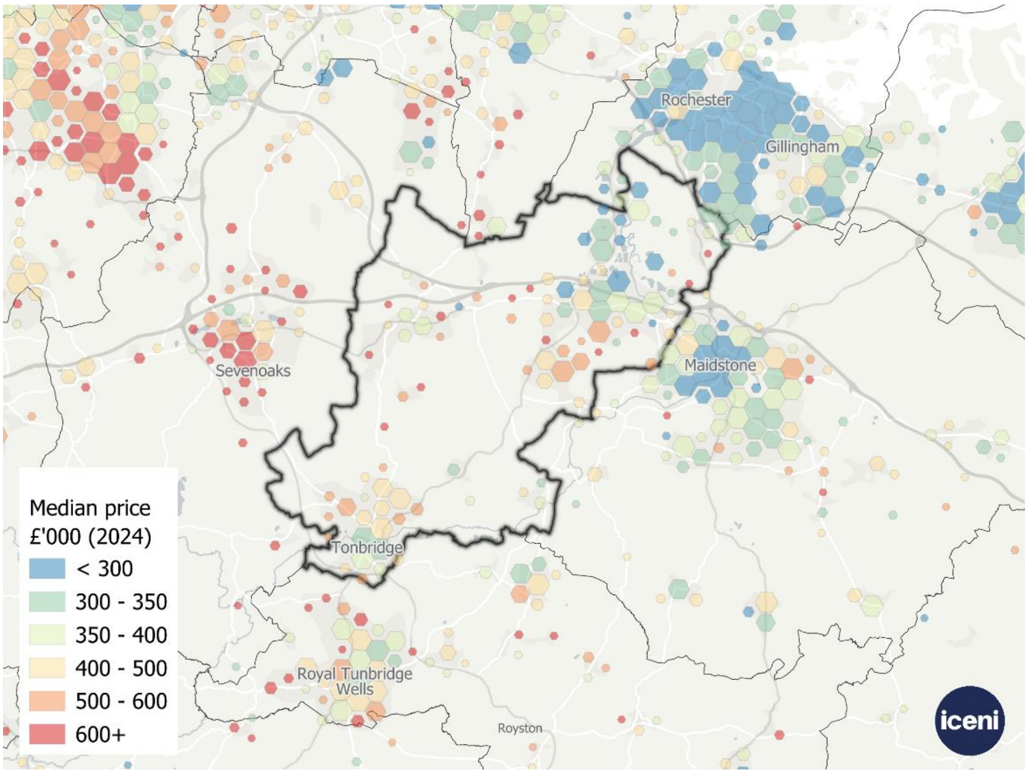
2.43 However, despite this, the data confirms Tonbridge and Malling Borough cannot be considered as an HMA in its own right. These levels of self-containment would not be sufficient to be a Travel to Work Area in its own right, which requires 75%.

House Price Analysis

2.44 The final analysis when identifying an HMA is to examine house prices. Although this source is better used for identifying sub-areas. As the map below demonstrates, there is significant variation in price across the Borough, with high values in the rural areas and lower values in more urbanised areas.

2.45 We also see that Tonbridge and Malling is a zone in transition with higher values to the west, closer to London and lower values to the east, particularly around Maidstone.

Figure 2.7 House Price Heat Map



Source: Iceni Projects

2.46 In a broad sense, we can see that there is a broad alignment between Tonbridge and Tunbridge Wells and Maidstone and the area around Aylesford and Larkfield. There is also some alignment between the rural parts of the borough and Sevenoaks.

HMA Conclusions

2.47 In drawing conclusions, we have focused on the migration and commuting analysis, both of which identify that Tonbridge and Malling cannot identify requisite levels of self-containment to be considered an HMA in its own right.

2.48 We would therefore conclude that the West Kent HMA, including Tonbridge and Malling, Tunbridge Wells, Maidstone and Sevenoaks, would remain a reasonable position.

2.49 This is confirmed by the self-containment rate analysis below, which shows that the "typical" 70% self-containment rate for an HMA is exceeded for several combinations.

Table 2.4 Commuting Self-Containment Rates (2021)

	Out Moves	In Moves	Internal Moves	Local Out Moves	Local In Moves	Self-Containment Rate Out	Self-Containment Rate In
Tonbridge and Malling and Maidstone	27,015	28,649	15,147	20,406	21,312	74%	71%
Tonbridge and Malling, Maidstone and Tunbridge Wells	38,767	40,875	22,828	27,570	28,972	83%	79%
Tonbridge and Malling, Maidstone, Tunbridge Wells and Sevenoaks	48,786	50,735	28,417	33,598	33,994	85%	84%

Source: Census 2021

2.50 We can also use the commuting and migration patterns, as well as the house price data, to derive sub-areas across the borough, as shown in the figure below.

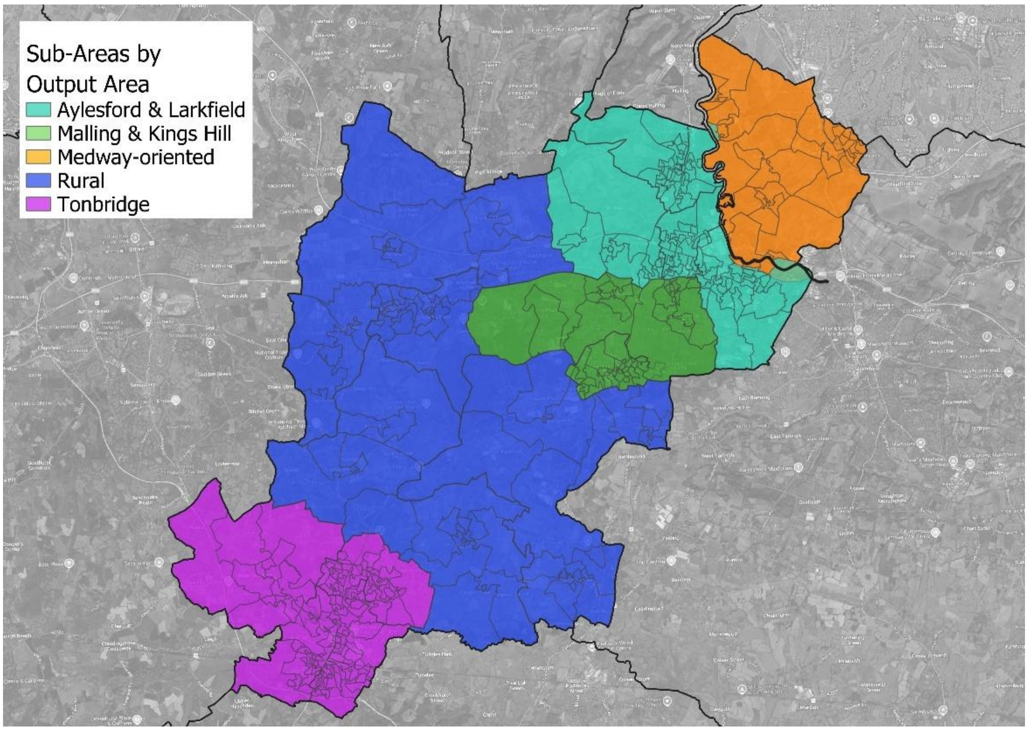
2.51 These show a Tonbridge sub-area which is central to the south of the Borough, including Hildenborough, but should recognise links with Tunbridge Wells.

2.52 The area to the very north of the borough is more closely related to the Medway towns in terms of both commuting and migration.

2.53 We have delineated between Malling and King's Hill and Aylesford and Larkfield, both of which have a large in-commuting draw. But they have different employment stock types and slightly different house prices. Both areas also have links with Maidstone.

2.54 The remaining rural parts of the Borough has limited commuting to them and also house prices are high. We believe this area has relationships to the north and south of the borough, but also west into Sevenoaks.

Figure 2.8 Tonbridge and Malling Sub-Areas



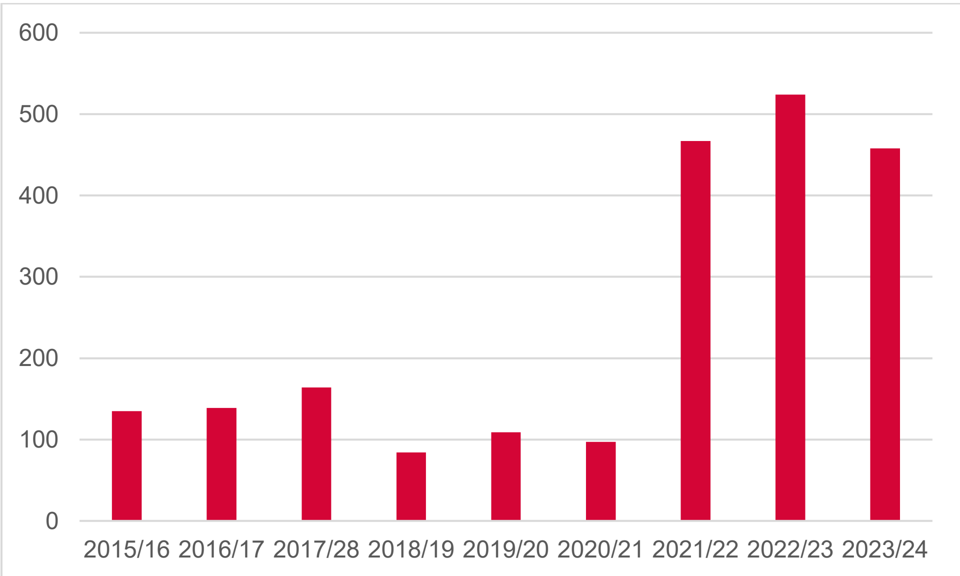
Source: Iceni Projects

3. Housing Stock Baseline

3.1 In 2021, Tonbridge and Malling had 55,487 dwellings and 53,536 households. This leads to an approximate level of vacant dwellings of 3.5%.

3.2 Since 2015/16, TMBC has seen a housing delivery of 2,117 dwellings, which equates to an annual average delivery of 242 dwellings. Housing delivery has increased significantly since 2021/22, coinciding with the introduction of the Council's Housing Delivery Test Action Plan. As a consequence, the average delivery in the most recent 3 years (483 dpa) is almost double that of the longer 9 year term.

Figure 3.1 Housing Completions (2011/12-2023/24)

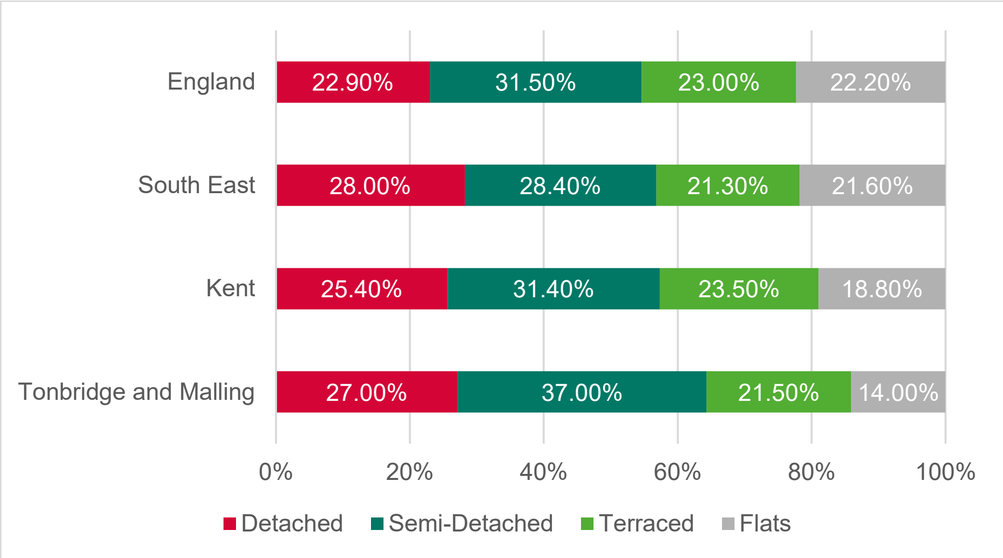


Source: Council Monitoring Data

Dwelling Type and Size

3.3 Tonbridge and Malling has a much higher proportion of semi-detached properties than the other comparable areas, with 11% more in TMBC than in the South East region. Conversely, flats are much less common at only 14% of dwellings, less than both the Kent and South East figures.

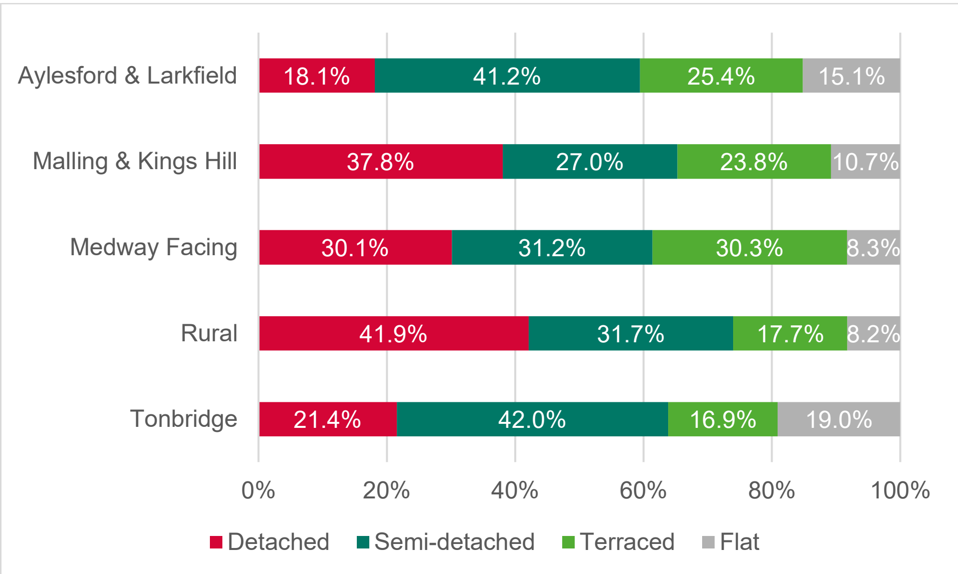
Figure 3.2 Dwelling Type (2021)



Source: Census 2021

3.4 At a sub-area level, the type of stock varies; the Rural area sees the highest proportion of detached dwellings, followed by Malling/Kings Hill. Aylesford & Larkfield sees the lowest proportion of detached properties but one of the highest of semi-detached alongside Tonbridge.

Figure 3.3 Type by sub area



Source: Census 2021

3.5 The proportion of terraces varies from 16.9% in Tonbridge to 30.3% in the Medway facing area, as does the proportion of flats, which is low in the Rural area at 8.2% but double that in Tonbridge (19%).

3.6 The type of properties in each area will also play a role in the number of bedrooms. Tonbridge and Malling has a high proportion of semi-detached dwellings, and given this, it is unsurprising to see that the number of 3-bedroom dwellings is also higher in the Borough relative to the other areas.

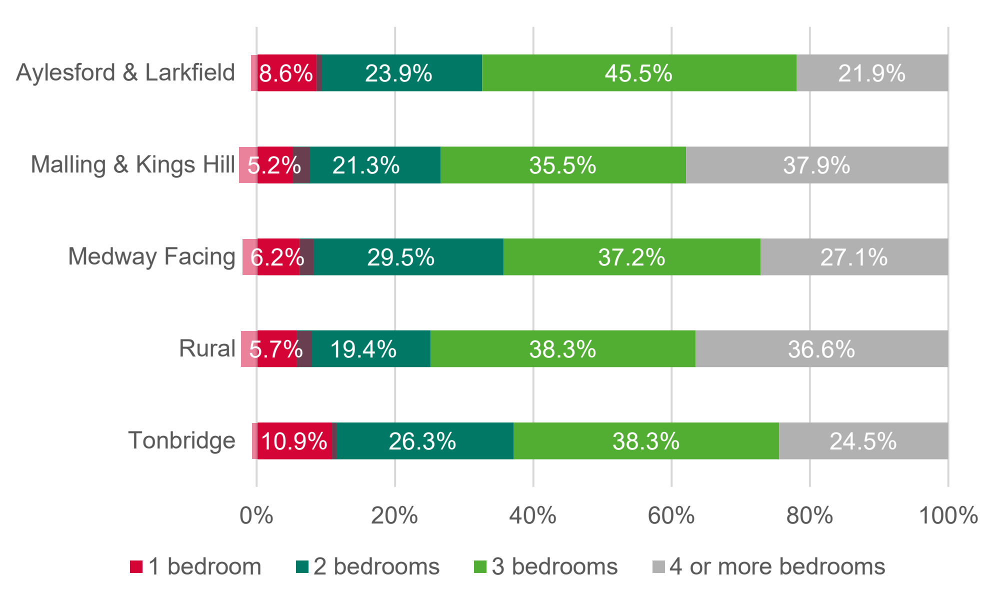
3.7 Ultimately, the housing stock in Tonbridge and Malling is typically larger and less dense than other areas with higher proportions of 3+ bedroom properties and lower proportions of 1 and 2 bedroom properties.

Figure 3.4 Dwelling Size (bedrooms)

Source: Census 2021

3.8 When this is broken down to the sub-area level, as the figure below shows, there is again a notable variation. Malling/Kings Hill and Rural areas have high proportions of 4+ bedroom stock, given the high proportions of detached dwellings in these areas, this can be expected.

Figure 3.5 Size by sub area



Source: Census 2021

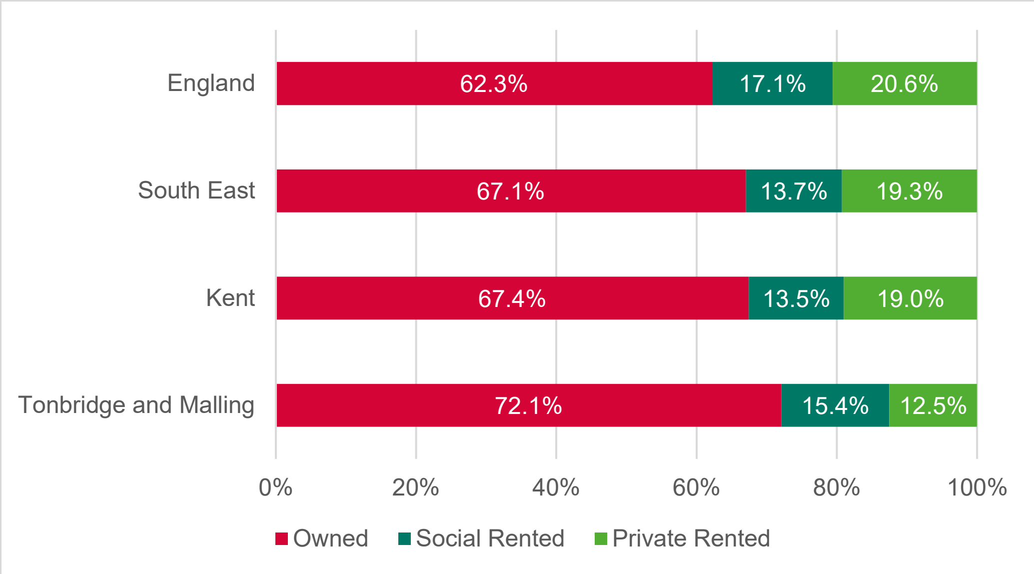
3.9 In a similar vein, Tonbridge has a higher proportion of 1-beds; again, this can be expected given the higher proportion of flats in this area. On the whole, areas with higher proportions of less dense dwelling stock (detached and semi-detached houses) see properties with more bedrooms than those with higher proportions of dense stock (terraces, flats).

Tenure

3.10 Tonbridge and Malling see a reasonably high proportion of owner-occupation (72.1%) in comparison to England, Kent and the Region (62.3%, 67.1% and 67.4% respectively).

3.11 The proportion of private rented dwellings is far fewer in TMBC compared to the region, while social rented dwellings make up a larger proportion of the dwelling stock. .

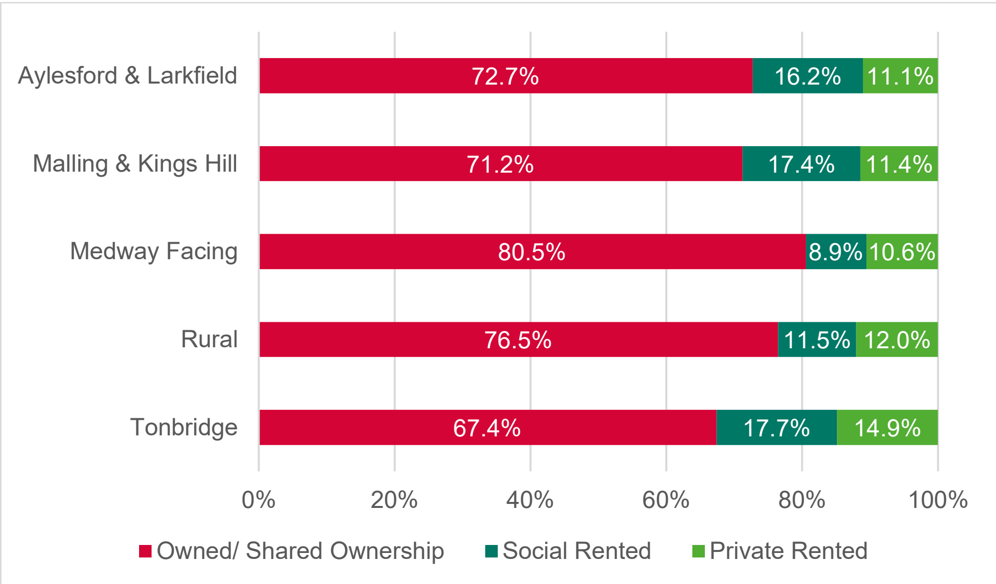
Figure 3.6 Dwellings by Tenure (2021)



Source: Census 2021

3.12 The Medway facing sub area sees the highest proportion of owner occupation than the other sub-areas at 80.5%. Conversely, the social rented sector is also much smaller here, with private renting more common.

Figure 3.7 Tenure by Sub Area



Source: Census 2021

3.13 The rural area sees a similar dynamic, albeit with a slightly lower level of owner occupation. Tonbridge sees the smallest proportion of owner occupation, alongside the highest of both social and private rents.

Household Composition

3.14 Household composition shows how families are structured within homes. Households with couples are the most common at 48.4% in TMBC, higher than that seen in the wider areas, which range from 41.9% in England to 44.6% in the South East.

3.15 Couples with dependent children take up the majority of this at 23.7%, which is higher than all other areas and is likely a contributing factor to the prevalence of couple-led households.

Table 3.1 Household Composition

	TMBC	Kent	South East	England
Couple with dependent children	23.7%	20.2%	20.7%	18.9%
Couple without children	17.4%	16.8%	17.4%	16.7%
One person household - Under 66	12.8%	14.7%	15.2%	17.3%
One person household - 66+	12.8%	13.7%	13.2%	12.8%
Family all 66+	10.8%	10.6%	10.2%	9.2%
Couple with non-dependent children	7.3%	6.7%	6.5%	6.3%
Lone parent family - dependent children	6.3%	6.6%	6.0%	6.9%
Lone parent family - non-dependent children	3.9%	4.0%	3.7%	4.2%
Other	4.7%	6.2%	6.6%	6.9%

Source: Census 2021

3.16 When broken down data suggests that although the proportion of couples with dependent children exceeds 22% in all areas, that it is highest in Malling & Kings Hil at 28.1%, conversely the proportion of couples with no children and non-dependents is low in this area.

3.17 Tonbridge sees the highest proportion of singles aged over 66, while the Rural area sees the highest proportion of couples aged over 66.

Table 3.2 Composition by Sub Area

	Ton-bridge	Rural	Medway Facing	Malling & Kings Hill	Ayles-ford & Larkfield
Couple - dependent children	23.2%	22.4%	22.4%	28.1%	23.1%
Couple - no children	16.0%	17.7%	21.2%	16.0%	18.6%
One person - Under 66	14.0%	10.2%	13.5%	11.9%	13.4%
One person - 66+	14.3%	13.7%	10.8%	10.9%	11.9%
Family all 66+	10.4%	13.8%	9.5%	10.5%	10.0%
Couple - non-dependent children	7.2%	8.1%	7.7%	6.7%	7.2%
Lone parent - dependent children	5.9%	4.7%	6.4%	7.5%	7.0%
Lone parent - non-dependent children	4.0%	4.1%	3.7%	3.5%	4.0%
Other	5.1%	5.4%	4.8%	5.0%	4.9%

Source: Census 2021

Occupancy Rating

3.18 Occupancy rating details the size of a dwelling relative to the size of the household occupying it. We have used the Census bedroom standard which compares the number of bedrooms in a home to the number required by the resident household.

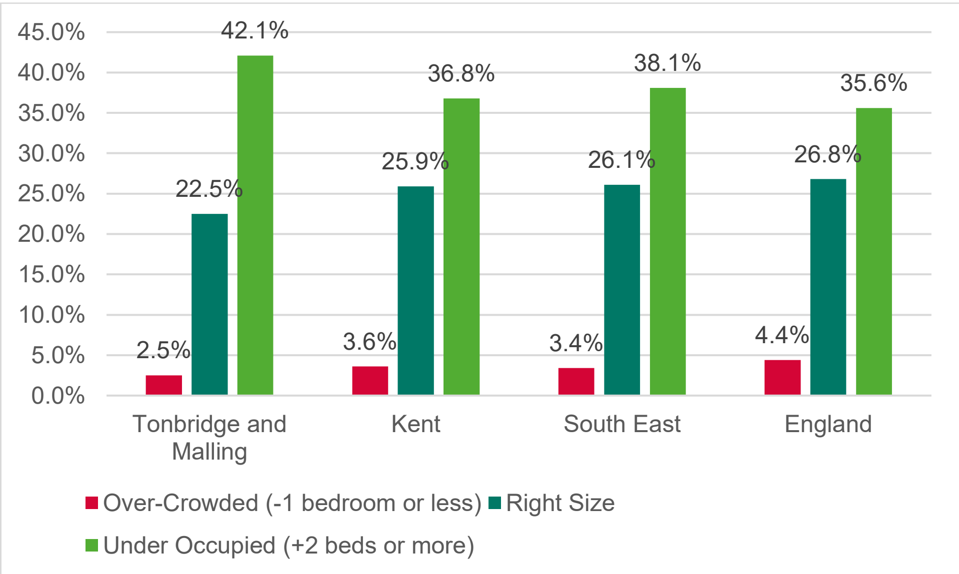
3.19 The rating system can indicate how homes are occupied: a positive score of +1 or more indicates that a dwelling is under-occupied (it has one or more bedrooms than the household needs), 0 indicates a dwelling that is at capacity or right sized and -1 or less a dwelling that it is over-occupied (it has at least 1 bedroom too few than the household needs).

3.20 The number of bedrooms needed by a household is calculated according to the bedroom standard which requires any of the following groups to have their own bedroom:

- adult couple
- any remaining adult (aged 21 years or over)
- two males or (aged 10 to 20 years)
- one male (aged 10 to 20 years) and one male (aged 9 years or under), if there is an odd number of males aged 10 to 20 years
- one male aged 10 to 20 years if there are no males aged 0 to 9 years to pair with him
- repeat the above steps for females
- two children (aged 9 years or under) regardless of sex
- any remaining child (aged 9 years or under)

3.21 Tonbridge and Malling has a higher level of under occupancy than all other areas at 42.1%. This reflects both the larger stock and the aging population.

Figure 3.8 Occupancy Rating (Bedrooms)



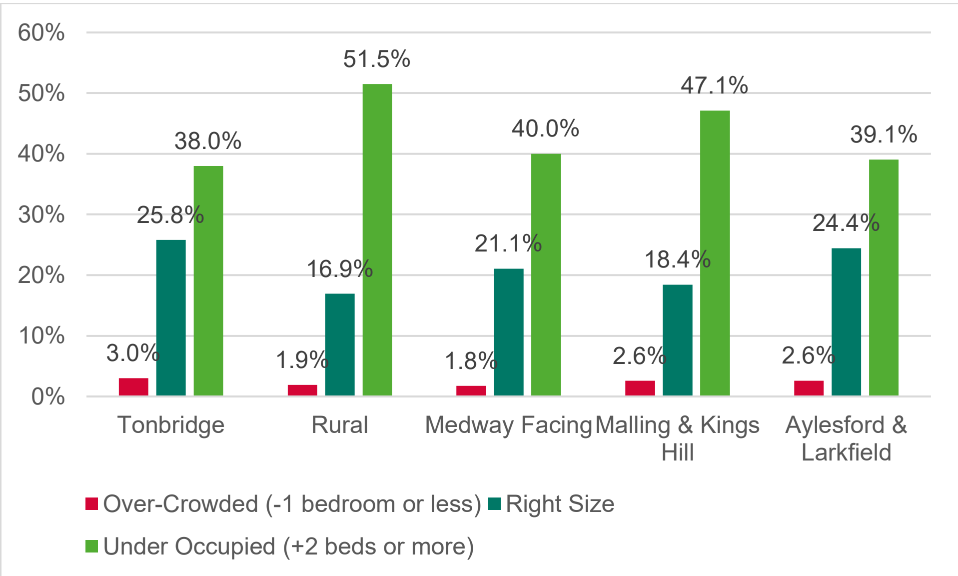
Source: Census 2021

3.22 This suggests there is a potential reason to support the downsizing of households that have more space than they need. This could be particularly relevant for older households who may wish to move into smaller accommodation that may be more easily adaptable to suit changing mobility needs.

3.23 The Rural area sees the highest proportion of under occupancy at 51.5%, followed by Malling and Kings Hill (47.1%). Given the high proportions of large, detached dwelling stock in these areas, this can be expected.

3.24 Overcrowding is low across the borough as a whole, but it is highest in Tonbridge at 3%, properties that are the right size is also highest here. Again, this reflects the areas smaller stock.

Figure 3.9 Occupancy by Sub-Area



Source: Census 2021

3.25 The occupancy rating differs significantly between tenures. Social rented dwellings in all areas are more likely to be at capacity than other tenure types, this is followed by private renting, then ownership. This is a factor of access to choice and household finances as explained below.

3.26 In owner-occupied dwellings, households will often have the financial means to choose to buy a property that suits their needs at the time of purchase. Given that such households seek to stay there for a long time, many will also choose to buy larger than their needs at the time of purchase to accommodate future growth in the household.

3.27 Similarly, families buy a home to meet their needs, but over time, their children leave, and their households become under-occupiers. This leads to low levels of at-capacity and overcrowded dwellings in this tenure.

3.28 The opposite is true in social rented dwellings, households who live in social rented stock are often there as they do not have the finances to access the private market (at least initially). Equally, many households in social rented stock are allocated accommodation to meet their need rather than in excess of it.

Table 3.3 Occupancy Rating by Tenure

Owned	Tonbridge and Malling	Kent	South East	England
Over-Crowded	53.1%	49.0%	51.0%	49.9%
At Capacity	12.1%	13.8%	13.6%	13.4%
Under Occupied	1.0%	1.5%	1.4%	1.9%
Social Rented	Tonbridge and Malling	Kent	South East	England
Over-Crowded	10.8%	8.6%	8.5%	8.9%
At Capacity	56.6%	58.9%	59.6%	55.6%
Under Occupied	8.1%	9.5%	8.9%	9.6%
Private Rented	Tonbridge and Malling	Kent	South East	England
Over-Crowded	17.0%	13.6%	14.2%	14.4%
At Capacity	40.3%	45.2%	46.0%	43.3%
Under Occupied	4.1%	6.6%	6.5%	7.5%

Source: Census 2021

3.29 The private rented tenure sees higher levels of overcrowding than owner occupation, as fewer households in the PRS will have some ability to choose to live in a dwelling that suits their current and future need, as residents are often more restricted financially.

3.30 A household in PRS for example, may be saving to be able to buy a house; they therefore will seek to limit outgoing costs and in doing so look to rent smaller properties, which often cost less.

3.31 Choice is limited even further in the social rented sector; social rented tenants will not have the financial means to enter into PRS properties and therefore are restricted to social rented dwellings, which are generally in short supply and are provided based on a household's need at the time.

3.32 Other policies, such as the bedroom tax, which reduces housing-related benefits to working-age tenants of social housing with a spare bedroom, also influence this by encouraging social rented tenants in under-occupied properties to downsize.

Housing Stock - Summary

3.33 As of 2021, the area contained 55,487 dwellings and 53,536 households, resulting in an approximate 3.5% vacancy rate.

3.34 Housing delivery since 2015/16 has averaged 242 dwellings annually, but this rate has increased significantly to 483 since 2021/22.

3.35 The overall housing stock in Tonbridge and Malling is characterised by a much higher proportion of semi-detached properties (41.9%) compared to Kent, the South East, and England.

3.36 The Borough also has a relatively high level of owner-occupation (72.1%), significantly exceeding wider comparators.

3.37 Looking at occupancy reveals a relatively high level of underoccupancy in Tonbridge and Malling overall (42.1%) compared to wider areas and low levels of over-crowding.

4. Housing Market Dynamics

4.1 This section of the report examines housing market dynamics in the buyers' market. It should be noted that this is a snapshot of the current market which is particularly volatile at present (May 2025). This volatility includes interest rate increases and the cost-of-living crisis.

National Housing Market Commentary

4.2 On a national level, Savills' March 2025 UK Housing Market Update[3] reports that the stamp duty deadline (31st March 2025) has encouraged short-term activity, but this is starting to tail off.

4.3 House prices rose by 0.4% in February 2025, according to Nationwide. Taking the annual house price growth to 3.9%. However, this still represents a deceleration from January and the strong end to 2024.

4.4 Completed transactions in the year to January 2025 outpaced the 2017-19 average by 2%, as buyers raced to beat the Stamp Duty Land Tax (SDLT) deadline. This also represents a significant 21% jump from last January, according to HMRC.

4.5 First Time Buyers (FTBs) in higher value markets are particularly incentivised to complete before the lowering of SDLT thresholds on 1st April. FTBs rose to 31% of new mortgages in December 2024 as a result – the highest proportion of the market they've held since the early 2000s.

[3] https://www.savills.co.uk/research_articles/229130/373816-0

4.6 There are signs of slowing demand on the horizon, as the chance of completing before the SDLT change diminishes. New enquiries from prospective buyers have suffered as a result, with January seeing the first reports of falling new buyer enquiries since last summer, according to the latest RICS survey. Sales also dipped slightly in February, according to TwentyCI, but remained above the 2017-19 average for the month.

4.7 Supply continued to rise, with the majority of surveyors reporting rising new instructions in January. This opened up the gap between supply and demand to its widest since the summer of 2023. The fall in demand compared to supply may result in lower price growth

House Prices

4.8 The median house prices in Tonbridge and Malling in the year to September 2024 was £390,000, slightly above the regional average (£375,000) and quite some way above that for England overall at £289,995.

Table 4.1 Median House Prices (year to September 2024)

	Overall
Tonbridge and Malling	£390,000
South East	£375,000
England	£289,995

Source: ONS, HPSSA

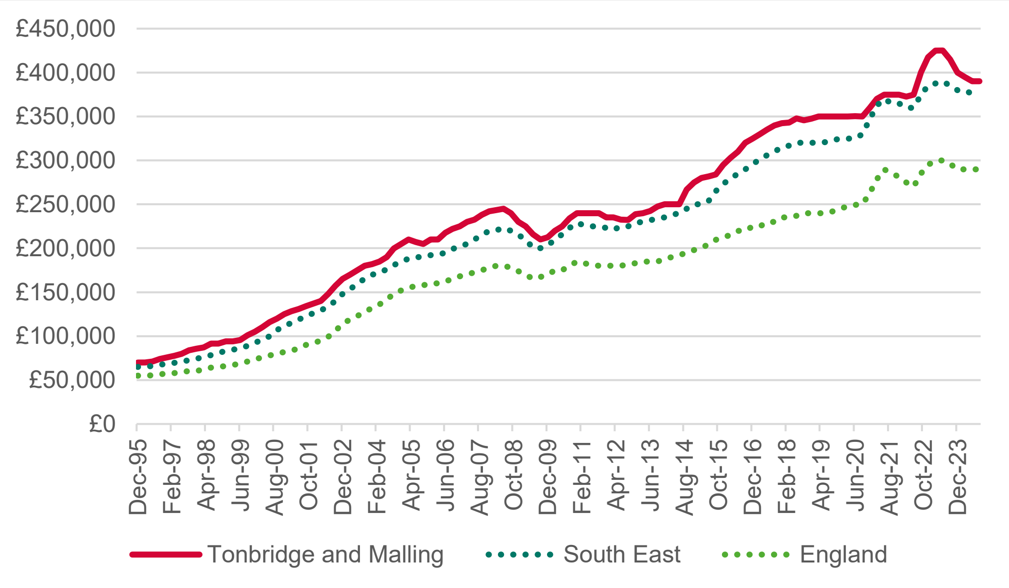
4.9 The figure below shows the change in median house prices since 2010. As shown, the price of homes in Tonbridge and Malling has been constantly higher than both the South East and National medians.

4.10 Prices in the most recent period from 2020 onwards have risen and fallen more so than previously. Macroeconomic factors such as Covid-19 and interest rate increases are key drivers behind this.

4.11 Interestingly, there appears to be a large jump from June 2022 to March 2023, although this matches the trend seen in the region and country, it is more apparent in TMBC than in the wider areas.

4.12 This coincides with jumps in interest rates in 2022 to above 2%, it potentially indicates that interest rate increases were less of a limiting factor to property sales in Tonbridge and Malling than in other areas.

Figure 4.1 House Prices (March 2010 to September 2024)



Source: ONS, HPSSA

4.13 In terms of overall change in house prices the table below shows the absolute and proportional increases in median prices over 5 (2019-24) and 10 (2014-24) year periods.

4.14 Over the last 10 years, the South East region has seen the highest proportional growth over the longer period at 60.3%, just slightly exceeding TMBC (57.6%) and the national growth (56.8%).

4.15 Over the past 5 years, England has seen the largest proportional growth in house prices (19.8%), with Tonbridge and Malling lower than the national and regional growth (11.4%), as well as the smallest absolute increase of the comparators. This may be a result of a lower starting point for England overall but also reflects a slowing of growth in TMBC, particularly in the past 5 years.

Table 4.2 House Price Change

	5 years (2019-24)		10 years (2014-24)	
	Absolute	%	Absolute	%
Tonbridge and Malling	£40,000	11.4%	£142,500	57.6%
South East	£52,000	16.1%	£141,000	60.3%
England	£47,995	19.8%	£104,995	56.8%

Source: ONS, HPSSA

4.16 High median house prices are often reflective of the type of stock available. In Tonbridge and Malling, the median costs for all different types of homes exceed those of both the wider areas.

4.17 The differences are most apparent in the costs for Flats and Detached properties which are £27,000 and £25,000 higher in TMBC than the wider South East, potentially indicating that these types of homes are more attractive to prospective buyers than other types in TMBC.

4.18 The median prices for Terraces are closest to the South East median with only a £5,000 difference.

Table 4.3 House Price by Type (Median, Year to September 2024)

	Overall	Detached	Semi	Terrace	Flat
Tonbridge and Malling	£390,000	£615,000	£415,000	£330,000	£247,000
South East	£375,000	£590,000	£395,000	£325,000	£220,000
England	£289,995	£420,000	£270,000	£235,000	£230,250

Source: ONS, HPSSA

4.19 Looking at the distribution of prices across the sub-areas, the table below shows the median prices paid for properties from January to December 2024 in each sub-area.

4.20 Malling and Kings Hill sees the highest overall prices at £476,500 followed by the Rural area at £450,000. The Medway-oriented and Aylesford & Larkfield sub-areas see the lowest overall prices, with Aylesford and Larkfield seeing the lowest prices across all types of property.

4.21 This difference between prices between the Malling/Kings Hill, Medway-oriented and Aylesford/Larkfield areas is interesting considering how close the sub-areas are to each other, this may be a factor of the quality of the stock and built environment in each area, particularly given the amount of new development coming forwards in Kings Hill which is likely to have an element of new build premium.

Table 4.4 Median price by Type and Sub-Area

	Overall	Detached	Flat	Semi	Terrace
Medway-oriented	£333,500	£555,000	£260,000	£350,000	£292,500
Aylesford & Larkfield	£340,000	£520,000	£225,000	£375,000	£310,000
Tonbridge	£425,000	£670,000	£247,500	£474,500	£382,250
Malling & Kings Hill	£476,500	£621,248	£270,000	£455,000	£363,250
Rural	£450,000	£820,000	£260,000	£440,000	£360,000

Source: Iceni analysis of Land Registry data(red highest value /blue lowest value by type)

4.22 Tonbridge see's the highest prices for both semi-detached and terraced properties, along with reasonably high costs for detached dwellings. The strong commuter links of Tonbridge with London is likely a factor behind this.

4.23 The town is particularly attractive to those who live or work in London and they are looking for more space, and are more likely to be able to afford to pay more for properties, ultimately increasing the costs in that area.

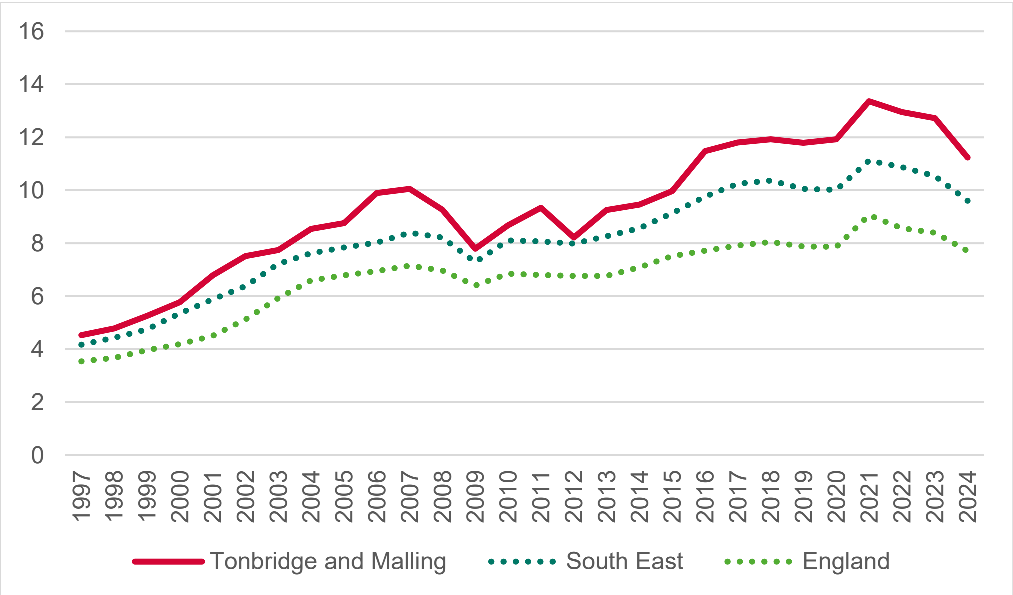
Affordability

4.24 The figure below shows the change in ONS' workplace-based affordability ratio over time. This ratio considers the median earnings of those working within an area compared to its median house prices. Tonbridge and Malling's ratio is highest at 11.23, compared to the regional figures of 9.61 and 7.71 across England.

4.25 Affordability has worsened over time, as the ratio indicates that the growth in median earnings in the areas has not kept up with house price growth.

4.26 However, since 2021, there has been an improvement in affordability in the shorter term, with the ratio decreasing from 13.36 in 2021 to 11.23 today. This decline has been seen at a smaller scale regionally and nationally.

Figure 4.2 Affordability Ratio (Workplace Based)



Source: ONS

4.27 This may be a result of improvements to house prices post pandemic, which can be linked to the end of the stamp duty holiday, as well as increases in interest rates, which have seen houses priced lower.

Table 4.5 Workplace VS Residence Based Affordability Ratio

	Workplace Based	Residence Based	Difference (=WB-RB)
Tonbridge and Malling	11.23	10.11	1.12
South East	9.61	9.3	0.31
England	7.71	7.71	0

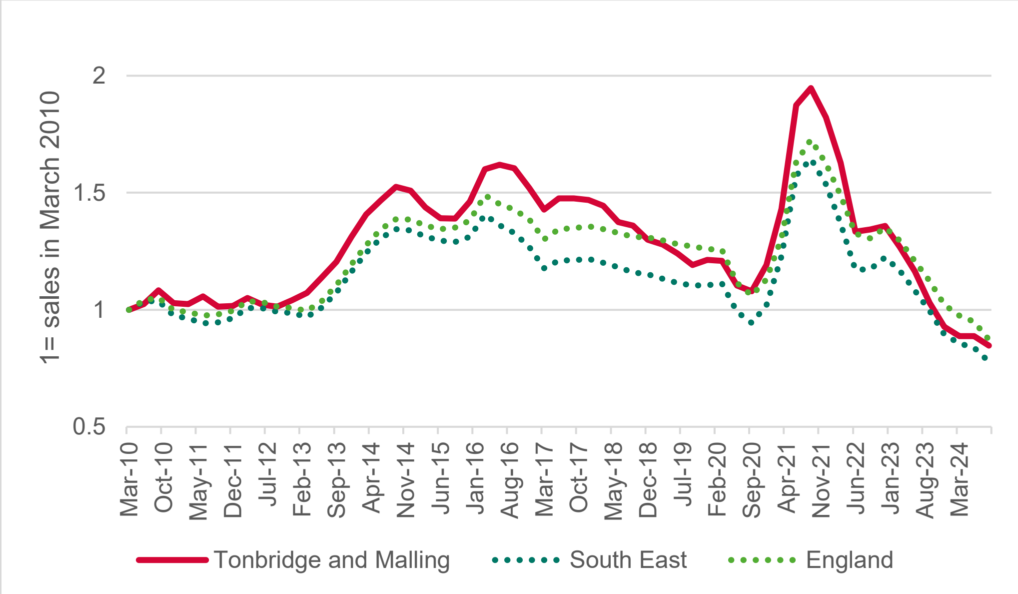
Source: ONS

4.28 When the workplace and residence-based affordability ratios are compared, it reveals that the residence-based ratio is lower in Tonbridge and Malling. This suggests that many higher-paid workers commute out of the area to work, and this would chime with the earlier commentary on commuting from Tonbridge.

Transactions

4.29 The figure below illustrates the number of property sales within each area and indexes this against the total sales of each area in March 2010. As shown, all areas saw increases up to December 2014 with variations from that point up to 2020. It is here that the initial impact of the Covid-19 pandemic can be seen with a small decline followed by a huge jump to September 2021.

Figure 4.3 Indexed Property Sales



Source: ONS

4.30 Sales fall again following the end of the Stamp Duty Holiday, where they come to a stop and level out between June 2022 and March 2023. The interest rate hikes then kick in, with sales again falling across all areas as mortgages are impacted and buyers are able to afford less.

4.31 The Covid-19-related jump in sales is particularly high in Tonbridge and Malling, with sales increasing to almost twice the number seen in 2010. This is likely to have impacted prices more as stock available for sale would have been in high demand.

Housing Market Summary

4.32 In the year to September 2024, the median property price in Tonbridge and Malling was £390,000, exceeding the regional and national equivalents.

4.33 Median prices have increased by 57.6% over the last 10 years. This increase is below the regional growth and above the national growth.

4.34 As with all areas, affordability has significantly deteriorated in the last 20 years, although there have been some recent improvements. Despite this, median prices are now over 11 times the median earnings of those working in the borough.

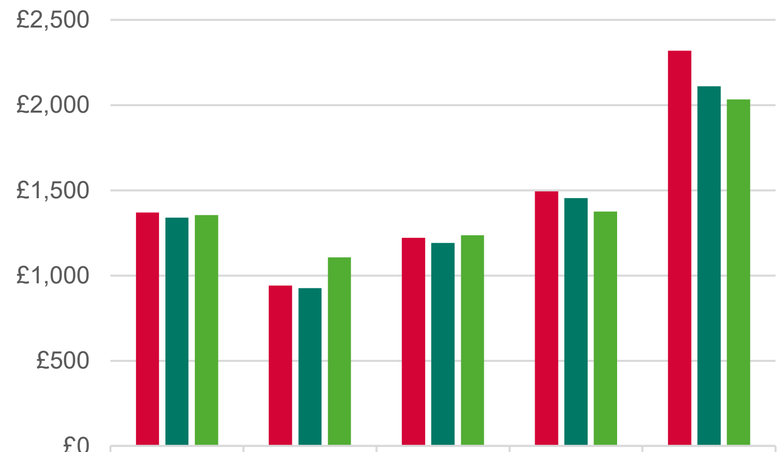
4.35 There has been a notable fall in the number of sales in the borough, but this is reflecting macroeconomic issues around interest rates and cost-of-living issues.

5. Private Rented Sector

5.1 The Private Rental Sector (PRS) makes an important contribution to the housing market, particularly for those people who cannot afford to buy, including those in affordable housing need.

5.2 The figure below shows the median rental costs per calendar month in each area for the year to September 2023. Median rents in Tonbridge and Malling are £1,370, which is £30 pcm higher than the regional median and £15 more than the national figure.

Figure 5.1 Median Rental Costs (pcm, year ending April 2025)



	Overall	1 Bed	2 Bed	3 Bed	4+Bed
Tonbridge and Malling	£1,370	£941	£1,222	£1,494	£2,320
South East	£1,340	£926	£1,192	£1,455	£2,110
England	£1,355	£1,106	£1,236	£1,376	£2,033

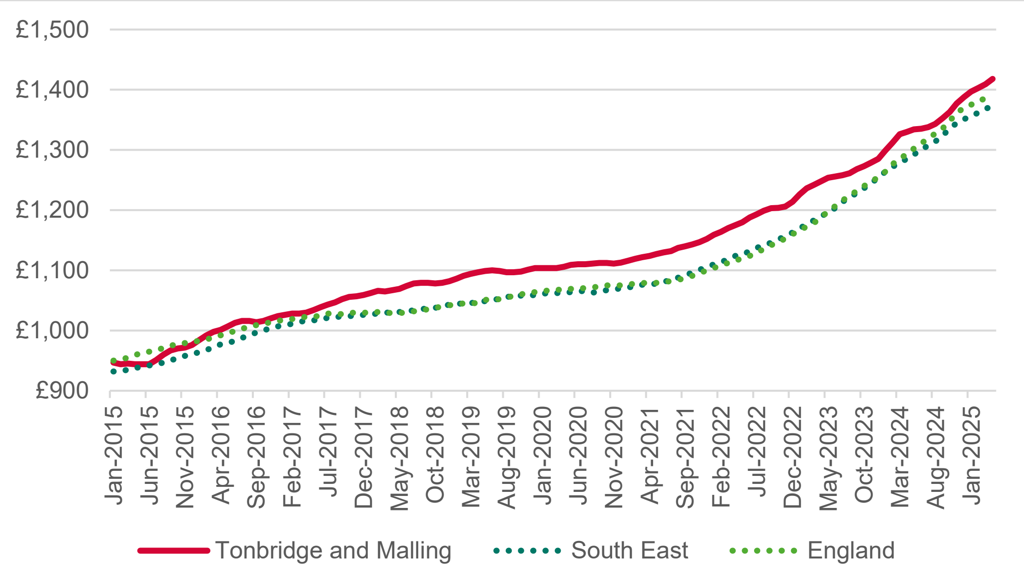
Source: ONS

5.3 In TMBC, median rents for all types of properties are higher than the South East average. The greatest disparity is for 4+ bedroom properties, where median rents are 10% higher than the South East average, which suggests the need for larger affordable units is not being met.

Rental Change

5.4 The figure below shows how rents have changed over time. Historically, Tonbridge and Malling have typically seen higher rental prices than England; however, since 2024, prices have converged slightly, with costs in the wider areas increasing at a faster rate than in TMBC.

Figure 5.2 Change in Average Prices (2015 -25)



Source: ONS

5.5 Over the last 10 years, median rents in the borough have increased by around 48%. In the last 5 years, rents have increased by around 28%, which is a slight acceleration.

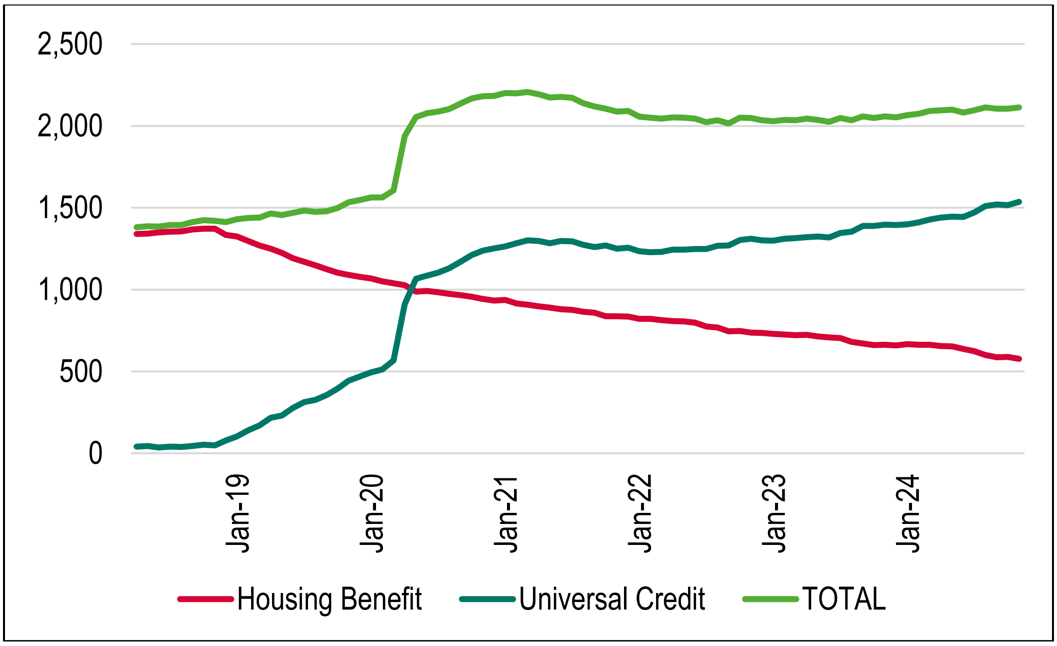
Benefit Supported Private Sector

5.6 Many properties within PRS will be occupied by tenants who receive a form of housing benefit to support the payment of their rent. This effectively illustrates how PRS addresses affordable housing need.

5.7 The figure below shows the change in tenants within PRS who are supported by either Housing Benefit or Universal Credit with a housing element over time. In November 2024, a total of 2,113 households in Tonbridge and Malling were supported by benefits.

5.8 The number of claimants jumped by around 33% between March and July 2020 as a result of the Covid-19 lockdown, and many workers lost their jobs or saw their income decrease. Fortunately, the number of claimants has decreased to below the pre-pandemic level as of April 2021 and has continued to fall since.

Figure 5.3 Benefit-Supported Private Rented Households



Source: Department for Work and Pensions

5.9 The amount of housing-related benefits a person can claim is determined by the Local Housing Allowance (LHA) in their Broad Rental Market Area (BRMA), which takes into account the average cost of rental housing in the area. Several BRMAs cover Tonbridge and Malling: High Weald, Maidstone and Medway and Swale.

5.10 The table below shows the standard LHA rates for different-sized properties. it should be noted that these can change depending on the claimant's personal circumstances.

Table 5.1 Local Housing Allowance per week (2024/25)

BRMA	Shared Room	1-bed	2-beds	3-beds	4-beds
High Weald	£105.82	£184.11	£247.40	£304.47	£420.00
Maidstone	£102.37	£172.60	£208.27	£276.16	£356.71
Medway and Swale	£94.36	£155.34	£195.62	£216.33	£299.18

Source: VOA

5.11 The table below shows the difference between the LHA rates and current median rental costs in each area (no data is available for shared rooms). As shown, there is a clear disconnect between LHA rates and current median rental costs, particularly for households that need just 1 bedroom could need to source almost £800 per month in some areas to make up the difference.

Table 5.2 LHA rates vs median rental costs

TMBC vs	1-bed	2-beds	3-beds	4-beds +
High Weald	-£756.89	-£693.60	-£636.53	-£521.00
Maidstone	-£768.40	-£732.73	-£664.84	-£584.29
Medway and Swale	-£785.66	-£745.38	-£724.67	-£641.82

Source: Iceni analysis

Housing in Multiple Occupation

5.12 This section of the report examines the market for housing in multiple occupation (HMOs) within the study area. A small HMO (use class C4) is a property which is let to between three and six people who form more than one household[4] and share a toilet, bathroom or kitchen

[4] A household consists of either a single person or members of the same family who live together. It includes people who are married or living together and people in same-sex relationships.

facilities. Where there are more than six unrelated individuals sharing amenities, this is termed a large HMO (Use Class Sui Generis).

5.13 At present, large HMOs require planning permission while small HMOs are permitted development when they are converted from an existing large home. Where there is evidence to justify it, the Council can introduce an Article 4 Direction (A4D) which will require any change of use to receive planning permission.

5.14 The HMO market is broad and technically includes entry-level housing, and smaller households of friends sharing as well as unrelated adults.

5.15 Data relating to HMOs is incomplete, this stems from not all HMOs requiring a licence, only those occupied by five or more people. There will also be incidences where HMOs of five or more people are not registered, and the extent of this illegal activity is not known.

5.16 We have sought to draw together data from a range of sources as well as consult with local letting agents to get a better understanding of the scale of demand in the study area.

Scale of HMOs

5.17 According to the 2021 Census, in Tonbridge and Malling there were 1,445 “Other” household types excluding those with dependent children. This equates to around 2.7% of households.

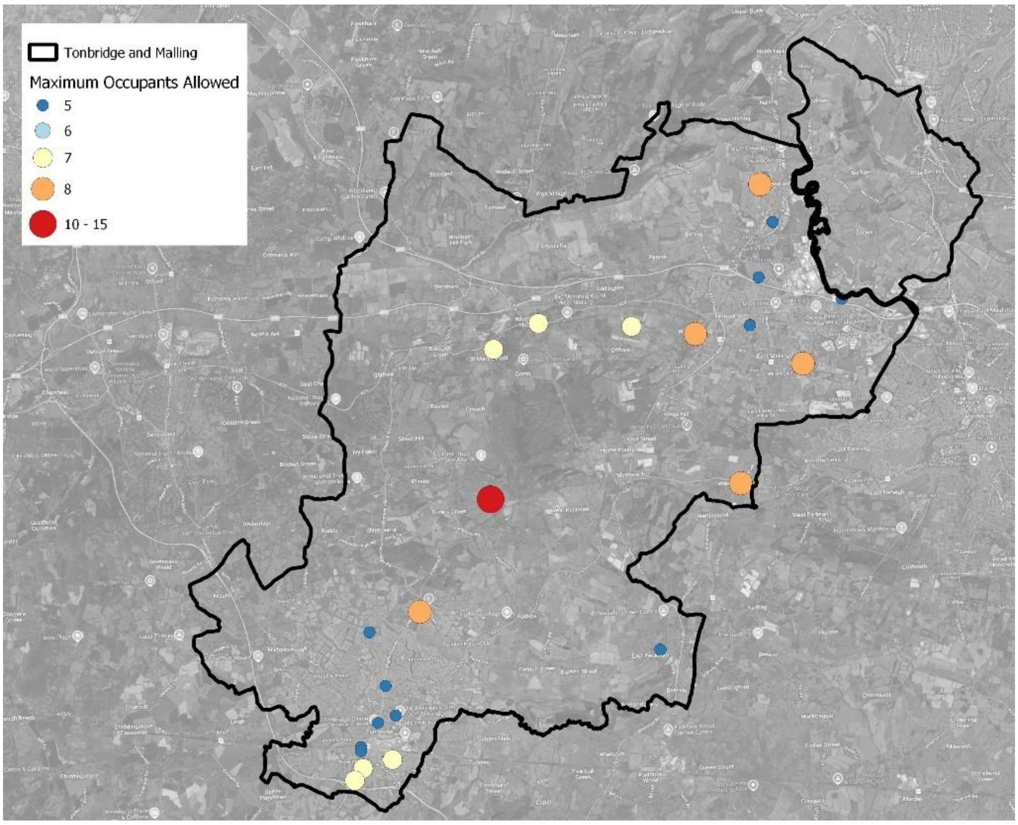
5.18 According to Council data 27 dwellings are currently registered as HMOs within the area. It is estimated that there is a total of 37 HMOs that are licensable, meaning that some do not currently have a license.

5.19 In 2023-24, Local Authority Housing Statistics suggest that there were 165 HMOs within Tonbridge and Malling, most of which will be small enough not to require a license.

5.20 The figure below shows the distribution of Licensed HMOs across Tonbridge and Malling; the Tonbridge area appears to see a concentration of units although these tend to be smaller units in the north of the town and slightly larger in the south.

5.21 Interestingly, it is the more Rural areas that see large HMOs, with Plaxtol having one with a maximum occupancy of 15. Given these rural locations, it is likely that this relates to accommodation for agricultural workers rather than those who live there full-time.

Figure 5.4 Licensed HMO distribution



Source: Council data

5.22 There are several other large HMOs that also relate to business operations, such as at Carroty Wood (a residential activity centre) and Harpwood House (elderly care home); again, these likely relate to staff lodgings rather than general marketed HMO rooms.

5.23 The table below shows the distribution of Licensed HMOs by Ward, showing the actual number of licenses as well as the maximum number of occupants that may be within them.

5.24 East Malling, West Malling & Offham and Judd see the highest number at 5, followed by Vauxhall at 4. As can be seen, there are some large HMOs in wards such as Bourne, Higham and Snodland West, where this is the only HMO in that ward.

Table 5.3 Licensed HMOs by ward

	Licenses	Max occupants
East Malling, West Malling & Offham	5	38
Judd	5	28
Vauxhall	4	27
Borough Green & Platt	2	15
Cage Green & Angel	2	12
East and West Peckham, Mereworth & Wateringbury	2	15
Aylesford North & North Downs	1	5
Bourne	1	15
Higham	1	9
Larkfield	1	6
Snodland East & Ham Hill	1	6
Snodland West & Holborough Lakes	1	10
Trench	1	6

Source: Council Data

HMO Market

5.25 Between 2014 and 2023, ONS has published rental statistics. More recent data is not available for rooms only with no lets having been made in that time; however, data is available from June 2022, albeit this is slightly outdated.

5.26 As shown in the table below, the price of rooms to rent in Tonbridge and Malling has increased by 56% in that time, which is a faster rate of growth than all other property sizes and is significantly higher than growth in the wider areas.

Table 5.4 Rental Change (pcm)

	Room	Studio	1-bed	2-beds	3-beds	4-beds+	Overall
TMBC June 2022	£625	£750	£800	£1,015	£1,350	£1,800	£1,058
TMBC Sept 2014	£400	£495	£650	£825	£1,100	£1,600	£850
TMBC Change	£143	£131	£179	£219	£281	£381	£231
TMBC % Change	56%	52%	23%	23%	23%	13%	24%
South East	15%	26%	29%	23%	33%	16%	25%
England	22%	24%	35%	33%	26%	32%	34%

Source: ONS, 2023

5.27 We can also examine Rightmove for a more up-to-date understanding of the HMO market. Although it is not a comprehensive view of the market, as many rooms will be advertised directly by the landlord more informally through newspapers and websites such as Gumtree and Facebook, it does provide a snapshot of the market.

5.28 In total, Rightmove was advertising 1 room in a 6-bedroom HMO property to rent in Tonbridge, for £850 pcm. A further search of rental site SpareRoom showed 18 rooms available across Tonbridge and Malling with prices ranging from £550 to £1,000 pcm. with a varying number of rooms available within each.

Policy Response

5.29 HMOs in Tonbridge and Malling are somewhat rare, no ward sees any more than 5 licensed HMO's and while data isn't available for the total number of HMOs within TMBC the Council's best estimate from 2023/24 is 165.

5.30 Looking at the data for licensed HMO's this shows that while there are several very large (7+ bedrooms) properties in this use, many are associated with businesses and provide accommodation for staff.

5.31 While HMOs can meet specific needs for workers and those who are on lower incomes, high concentrations can lead to an erosion of the character of an area and impact community cohesion. It can also lead to environmental and economic impacts; as such, planning controls can be introduced to manage their presence in the authorities.

5.32 There is also a wider need within the NPPF to ensure mixed and balanced communities; therefore, high concentrations of housing of a particular type, not just HMOs, should be avoided.

5.33 At present, planning controls can limit the delivery and occupation of newly built dwellings as HMOs. However, subject to certain conditions, the change of use from a dwelling house to a small HMO is a permitted development, meaning it does not require planning permission.

5.34 Councils do have the power, through the use of an Article 4 Direction, to introduce the requirement for planning permission for small HMOs and therefore remove permitted development rights. Note, this is not a power to restrict small HMOs but rather to require them to get planning permission. This will allow the Council to manage where new HMOs can be permitted to maintain a balance of housing types across the study area.

5.35 Article 4 Directions cannot be applied across the entirety of each area without justification. In any case, we do not believe that there is any evidence for such a policy to be applied within Tonbridge and Malling or any locale within it.

5.36 While Article 4 Directions can better manage the supply of HMOs there is also the possibility that it could displace them to other areas. With this in mind, the spread of HMOs should be monitored and responded to accordingly.

5.37 Other potential responses are to ensure a greater supply of smaller one-bed and studio flats, as this will divert some of the demand. This can be delivered through build-to-rent developments, which can also deliver affordable private rent. This ensures a supply of smaller, affordable homes in each area as an alternative to HMOs.

Build-to-Rent

5.38 Concerning Build to Rent, the Housing White Paper (February 2017) set out that the then Government wanted to build on earlier initiatives to attract new investment into large-scale housing which is purpose-built for market rent (i.e., Build to Rent).

5.39 The then Government set out that this would drive up the overall housing supply, increase choice and standards for people living in privately rented homes and provide more stable rented accommodation for families, particularly as access to ownership has become more challenging.

5.40 The NPPF sets out that the needs of people who rent their homes (as separate from affordable housing) should be assessed and reflected in planning policies (Para 63). The NPPF glossary also includes a definition for Build to Rent development:

> *"Purpose-built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development."*

5.41 It therefore represents development which is constructed with the intention that it will be let rather than sold.

Benefits of Build-to-Rent

5.42 The benefits of Build to Rent are best summarised in the former Government's A Build to Rent Guide for Local Authorities which was published in March 2015. The Guide notes the benefits are wide-ranging but can include:

- Helping local authorities to meet the demand for private rented housing whilst increasing tenants' choice "as generally speaking tenants only have the option to rent from a small-scale landlord."
- Retaining tenants for longer and maximising occupancy levels as Build to Rent investment is an income-focused business model;
- Helping to increase housing supply, particularly on large, multiple-phased sites as it can be built alongside build-for-sale and affordable housing; and
- Utilising good design and high-quality construction methods which are often key components of the Build to Rent model.

5.43 This Build to Rent Guide provides a helpful overview of the role that Build to Rent is intended to play in the housing market, offering opportunities for those who wish to rent privately (i.e. young professionals) and for those on lower incomes who are unable to afford their own home.

5.44 Over recent years, there has been rapid growth in the Build to Rent sector backed by domestic and overseas institutional investment. Savills' UK Build-to-Rent Market Update[5] for Q1 2025 states that the BTR market now has 127,000 completed units, 50,000 under

[5] https://www.savills.co.uk/research_articles/229130/376156-0

construction and 110,000 in the development pipeline, a total of 287,000 units.

5.45 However, much of this stock is located in the largest cities of London, Manchester, Birmingham and Leeds. It has not yet started to reach smaller towns in large numbers due to the economy of scale required and the lack of potential tenants for this product.

The Profile of Tenants

5.46 The British Property Federation (“BPF”), London First and UK Apartment Association (“UKAA”) published (November 2022) a report[6] profiling those who live in Build to Rent accommodation in England. Whilst this is focused on more urban locations, it helps understand the broad profile of tenants.

5.47 According to their research around 40% of residents were aged between 25 and 34, which is broadly similar to the wider private rented sector.

5.48 The survey identified that incomes are similar to those in private rented sector accommodation with 18% earning between £26,000 and £32,000 per annum, and 23% earning between £32,000 and £44,000 per annum.

5.49 The report also noted that Build to Rent has comparable levels of affordability but is notably more affordable for couples and sharers.

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[6] https://bpf.org.uk/our-work/research-and-briefings/who-lives-in-build-to-rent-2022/

Potential Demand in Tonbridge and Malling

5.50 Data collected by the HomeViews website[7] on Build-to-Rent development suggests that there is one existing BTR scheme north of Snodland at Peters Village.

5.51 There are 94 BTR units, all of which are 3-bedroom, although the scheme was developed by Vistry, it is now operated by Leaf Living[8]. Further analysis of the Leaf Living website indicates that they operate two further developments in proximity, one in East Malling at Pippin's Place and another outside TMBC in Paddock Wood. All these schemes are "single-family" BTR, which are typically suburban in style.

5.52 There are two BTR schemes in neighbouring Medway, at Chatham (71 units) and Gillingham (192 units) waterfronts. These are multi-family BTR schemes which are typically higher-density flatted developments. These developments are operated by Three Sixty Space[9] and Way of Life[10].

5.53 Even though there are only two BTR schemes in TMBC at the moment, the presence of several schemes built by different developers and managed by different operators in neighbouring locations indicates that there is likely to be further interest from the development industry in promoting BTR development in the area.

5.54 Single-family BTR would suit the area best as it better matches the built form in locations across Tonbridge and Malling. There could be a market for 'multi-family' BTR provision in Tonbridge town, where the

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7 Interactive Build to Rent Map - HomeViews Business Hub
8 Leaf Living at Peters Village | Apartments To Rent In Kent
9 Our Rental Developments
10 The Kell - Flats To Rent in Chatham - Way of Life | Way of Life

HMO market is slightly stronger, as this tends to be higher-density flatted development and therefore focused on more urban locations.

The Recommended Policy Response

5.55 The PPG on Build to Rent recognises that where a need is identified, local planning authorities should include a specific plan policy relating to the promotion and accommodation of Build to Rent.

5.56 In recognition of the potential growth of the sector, the Council may consider including a policy on Build-to-Rent development to set out parameters (such as design, contract lengths, space standards, communal space standards (even if just stipulating wider standards apply) and facilities, outdoor space, bike storage and active transport measures etc.), regarding how schemes would be considered on planning application.

5.57 This policy should also deal with how affordable housing policies would be applied. An example of this can be found in the London Plan 2021 and associated Affordable Housing and Viability Supplementary Planning Guidance.

5.58 Given that the sector is still evolving, we would recommend that the Council is not overly prescriptive on the mix of dwelling sizes within new Build to Rent development. While the recommended size mix outlined within this report works as a good starting point the Council should work with developers to understand what mix can viably be delivered on each site.

5.59 The mix on each site should be reflective of the type of development proposed, for example, proposed multi-family (flatted schemes) are unlikely to deliver 4 bed properties, as well as the location of the scheme.

5.60 The NPPF's definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management control.

5.61 The Council will also need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build to Rent development will, however, differ from that of a typical mixed tenure development in the sense that returns from the Build to Rent development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are sold.

5.62 In general terms, it is expected that a proportion of Build to Rent units will be delivered as 'Affordable Private Rent' housing. Planning Practice Guidance[11] states that:

> *"The National Planning Policy Framework states that affordable housing on build-to-rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build-to-rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build-to-rent landlord.*
>
> *20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build-to-rent scheme. If local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.*

[11] ID: 60-002-20180913

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development"

5.63 The Council should have regard to the PPG on Build-to-Rent developments. This states that at least 20% of the units within a Build to Rent development should be let as Affordable Private Rented units at a discount of 20% to local market rents. The Council might consider whether these should be capped at LHA rates, subject to viability.

Private Rental Sector – Summary

5.64 The private rental sector (PRS) makes an important contribution to the housing market, including individuals with an affordable housing need.

5.65 As of the year ending April 2025, median monthly rents in Tonbridge and Malling stood at £1,370, higher than the regional and national medians.

5.66 In the last 5 years, rents have increased by around 28%, which is a slight acceleration from the previous 5 years.

5.67 In November 2024, a total of 2,113 households in Tonbridge and Malling were supported by benefits. This is despite a clear disconnect between LHA rates and current median rental costs.

5.68 The latest Statistics suggest that there were 37 licensed HMOs in Tonbridge and Malling. Unlicensed HMOs are estimated to be higher at 165.

5.69 The small number of HMOs in the area does not indicate a need to introduce additional planning controls, such as A4D's to limit them.

5.70 There are currently 2 single-family build-to-rent schemes in Tonbridge and Malling. This and the small number of developments in neighbouring local authorities indicate growing demand.

5.71 In recognition of the potential growth of the sector, the Council may consider including a policy on Build-to-Rent development to set out its expectations on how these sites should look and operate, including how affordable housing policies would be applied.

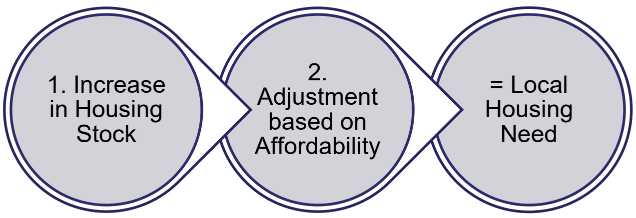
6. Overall Housing Need

6.1 This section of the report calculates housing need and later develops projections to consider the population implications of housing delivery in line with this number.

Standard Method

6.2 The starting point for assessing housing need is the standard method, which is set out by the Government in Planning Practice Guidance. The two-step process is illustrated in the figure below and worked through for Tonbridge & Malling.

Figure 6.1 Overview of the Standard Method for Calculating Local Housing Need



6.1 Step 1 seeks to grow the housing stock in each area by a flat 0.8% growth per annum.

6.2 Step 2 is an affordability uplift which uses an average of the last five years' affordability ratios and for each 1% the average ratio is above 5 the housing stock baseline is increased by 0.95%, with the calculation being as follows:

$$\boldsymbol{Adjustment\ Factor = \frac{Affordability\ Ratio - 5}{5} x0.95}$$

Step 1: Housing Stock Baseline

6.3 The first step in considering housing need using the standard method is to establish a baseline of housing stock. This is derived from Live Table 125, which is published annually. The stock baseline is calculated as 0.8% of the existing stock.

6.4 The PPG in Para 2a-005 directs that 'the most recent data published at the time should be used.' At the time of preparing this report the latest data on the housing stock position is for 2023.

6.5 In 2023, the housing stock in Tonbridge and Malling was estimated to be 56,446. This results in a step one need of 452 dpa based on 0.8% of the existing stock.

6.6 At late stage in the production of the report, the latest dwelling stock estimates for 2024 for Tonbridge and Malling were published, and these show a housing stock of 56,823 dwellings of which 0.8% is 455 a difference of 3 dpa.

Step 2: Affordability Adjustment

6.7 The affordability adjustment is then applied to the baseline figure. This uses the average median (workplace-based) house price to income ratio over the last 5 years, which at the current time is for 2020-24.

6.8 The average median affordability ratio over the last five years in Tonbridge and Malling was 12.44, meaning that homes were 12.44 times the average annual earnings of those working in Tonbridge and Malling.

6.9 Putting this figure through the adjustment calculation increases the need to 241% of the baseline. This uplift results in a housing need of 1,090 dwellings per annum (dpa). How this has been derived is shown in the table below.

Table 6.1 Revised Standard Method Calculation (March and May 2025)

	Tonbridge and Malling March 2025*	Tonbridge and Malling May 2025
Housing Stock, 2023	56,446	56,823
0.8% Stock Baseline (Step 1)	452	455
Average Median Affordability Ratio, 2020-24	12.44	12.44
Affordability Uplift	241%	241%
Local Housing Need (Step 2)	1,090	1,097

*Source: Iceni Projects and MHCLG * This report is based on the March 2025 figure*

6.10 By applying the same uplift to the revised housing stock baseline results in a housing need of 1,097 dwellings per annum (dpa). This is a difference of 7 dpa. This is not considered to be a material difference.

6.11 As this report was largely completed in April 2025, the remaining analysis in this report is based on the 1,090 dpa figure. As this is only a marginally lower number than the current standard method (May 2025), the analysis herein remains valid for policy making.

Population Projections

6.12 This section of the report examines the population implications of delivering housing in line with the Standard Method for assessing housing need i.e. 1,090 dwellings per annum. We do not consider that the addition of 7 dwellings per annum would considerably alter and outputs.

6.13 The method used has been to develop a trend-based projection and then flex levels of migration to and from the Borough so there is a sufficient population to fill the suggested number of homes. The projections look at the 2024-42 period. The analysis below starts with a review of local population trends.

Population

6.14 As of mid-2023 (the latest date for which ONS has published mid-year population estimates (MYE)), the population of Tonbridge & Malling is estimated to be 135,200; this is an increase of around 12,200 people over the previous decade (a 10% increase), which is slightly higher than seen across the other areas studied.

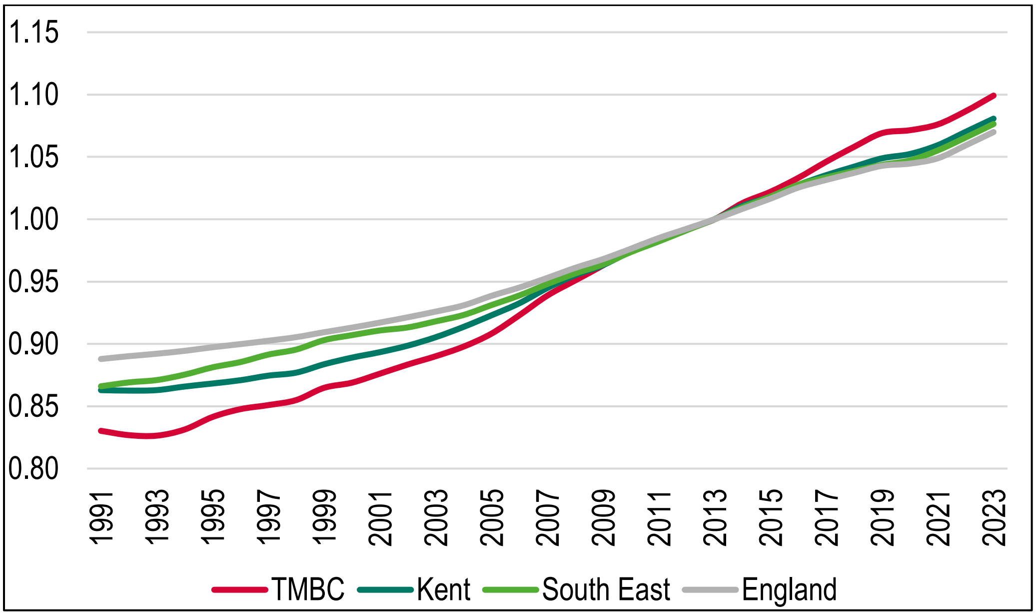
Table 6.2 Population change (2013-23)

	2013	2023	Change	% change
Tonbridge & Malling	123,006	135,206	12,200	9.9%
Kent	1,490,021	1,610,251	120,230	8.1%
South East	8,809,382	9,482,507	673,125	7.6%
England	53,918,686	57,690,323	3,771,637	7.0%

Source: Mid-year population estimates

6.15 The figure below shows an indexed population change back to 1991 (index to 1 in 2013). This shows population growth to have generally been stronger than seen in other areas throughout the period studied.

Figure 1.5: Indexed Population Change – 1991-2023



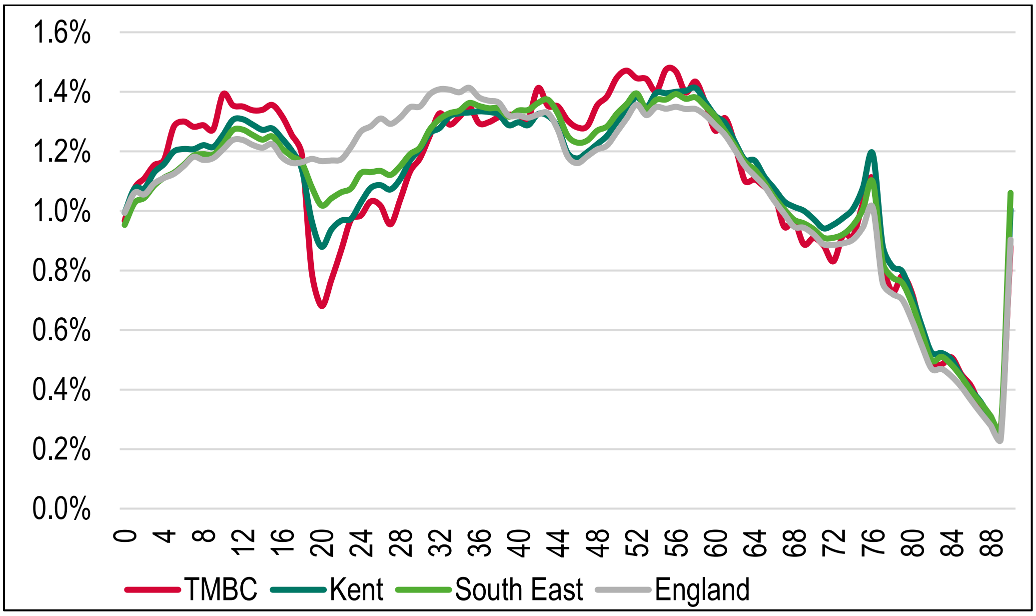
Source: Mid-year population estimates

Age Structure

6.16 The figure below shows the age structure by single year of age (compared with a range of other areas). Overall, the population structure is broadly similar to that seen in other locations with key differences being in some younger age groups, notably a higher proportion of children (aged up to about 17/18) and a lower proportion of people in their late teens and early 20s.

6.17 This latter observation will be linked to people moving away for further education, although the data does also point to many of these returning over time.

Figure 1.6: Population profile (2023)



Source: Mid-year population estimates

6.18 The analysis below summarises the above information (including total population numbers for Tonbridge & Malling) by assigning population to three broad age groups (which can generally be described as a) children, b) working age and c) pensionable age). This analysis confirms the similar age structure but does highlight the slightly higher proportion of children (20% aged Under 16).

Table 6.3 Population profile (2023) – summary age bands

	Tonbridge & Malling		Kent	South East	England
	Population	% of population	% of population	% of popn	% of population
Under 16	27,087	20.0%	19.2%	18.6%	18.5%
16-64	82,011	60.7%	60.3%	61.7%	62.9%
65+	26,108	19.3%	20.5%	19.8%	18.7%
All Ages	135,206	100.0%	100.0%	100%	100.0%

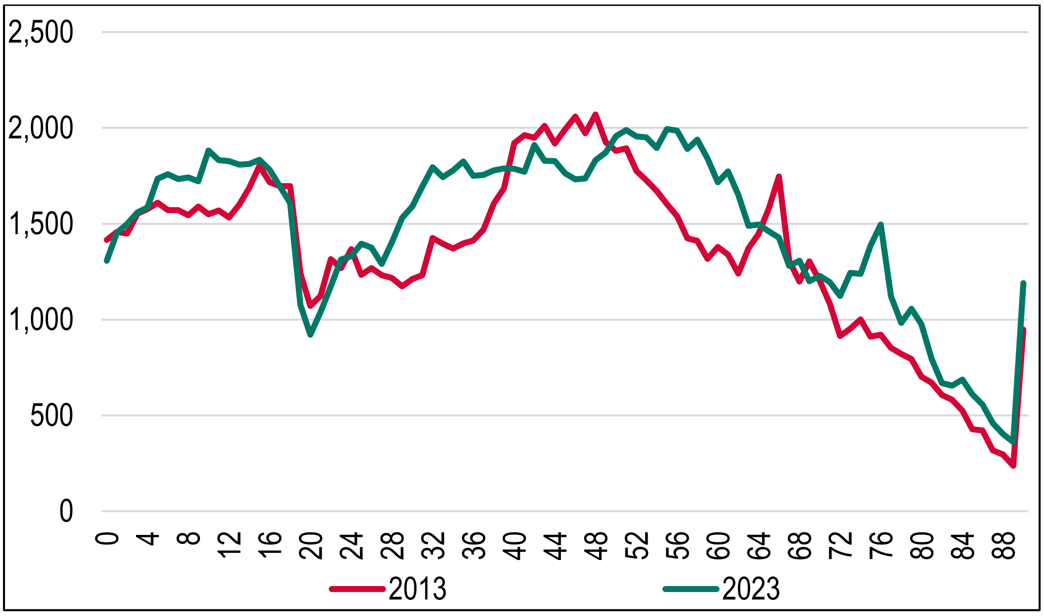
Source: Mid-year population estimates

Age Structure Changes

6.19 The figure below shows how the age structure of the population has changed in the 10-year period from 2013 to 2023 – the data used is based on population so will also reflect the increase seen in this period.

6.20 There have been some changes in the age structure, including increases in the population in their 50s; the number of people aged 65 and over also looks to have increased notably. Where there are differences, it is often due to cohort effects (i.e. smaller or larger cohorts of the population getting older over time.

Figure 1.7: Population age structure (people) (2013 and 2023) – Tonbridge & Malling



Source: Mid-year population estimates

6.21 Again, the information above is summarised into the three broad age bands to ease comparison. This shows population increases in all age bands with the highest proportionate increase being amongst those aged 65 and over.

6.22 However, in total population terms the key growth age group has been people aged 16-64 – this age group increasing by 6,400 people, accounting for 52% of all population change in the area.

Table 6.4 Change in population by broad age group (2013-23) – Tonbridge & Malling

	2013	2023	Change	% change
Under 16	25,076	27,087	2,011	8.0%
16-64	75,617	82,011	6,394	8.5%
65+	22,313	26,108	3,795	17.0%
TOTAL	123,006	135,206	12,200	9.9%

Source: Mid-year population estimates

Components of Population Change

6.23 The table below consider the drivers of population change from 2011 to 2023. The main components of change are natural change (births minus deaths) and net migration (internal/domestic and international).

6.24 There is also an Unattributable Population Change (UPC) which is a correction made by ONS upon publication of Census data if population has been under or over-estimated (this is only calculated for the 2011-21 period). There are also ‘other changes’, which are variable (sometimes positive and sometime negative but generally small in size) – these changes are often related to armed forces personnel, prisons or boarding school pupils.

6.25 The data shows natural change to generally be dropping over time – there are still more births than deaths, but the figures are more in balance than was seen a decade or so ago. Migration is variable, and always positive for internal (domestic) migration.

6.26 For international net migration figures are much lower (and occasionally negative); however, the last two years for which data is available shows a notably higher level of international migration than had been seen generally in the past – this being a consistent trend to that seen nationally.

6.27 The analysis also shows (for the 2011-21) period a small negative level of UPC (totalling around 700 people over the 10-year period), which suggests that when the 2021 Census was published, ONS had previously overestimated population change. Overall, the data shows a continuing trend of increasing population throughout the period studied.

Table 6.5 Components of population change, mid-2011 to mid-2023 – Tonbridge & Malling

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2011/12	504	526	21	13	-105	959
2012/13	474	487	45	36	-82	960
2013/14	501	1,085	94	15	-98	1,597
2014/15	405	690	99	1	-86	1,109
2015/16	352	944	157	5	-80	1,378
2016/17	459	1,215	5	-16	-73	1,590
2017/18	393	1,135	-25	16	-50	1,469
2018/19	333	1,111	-25	5	-71	1,353
2019/20	281	168	-131	6	-35	289
2020/21	147	513	-50	10	-48	572
2021/22	214	638	446	3	0	1,301
2022/23	2	1,028	499	13	0	1,542

Source: ONS

Developing a Trend-Based Projection

6.28 The purpose of this section is to develop a trend-based population projection using the latest available demographic information – this projection then being used as a base to develop an alternative scenario linking to the Standard Method (at the time 1,090 dpa).

6.29 A key driver for developing a new projection is due to the publication of 2021 Census data, which has essentially reset estimates of population (size and age structure) compared with previous mid-year population estimates (MYE) from ONS (ONS has subsequently updated 2021 MYE figures to take account of the Census). In addition, as referenced above, a 2023 MYE is now available.

6.30 The projection developed looks at estimated migration trends over the past 5 years with this period being used as it is consistent with the time period typically used by ONS when developing subnational population projections.

6.31 Below, the general method used for each of the components and the outputs from the trend-based projection is set out. The population projection uses the framework of ONS subnational population projections (SNPP) as a starting point.

6.32 This means considering data on births, deaths and migration. The most recent ONS projections are 2018-based and therefore quite out-of-date, given there are now population estimates and components of change data up to 2023. The 2018-based projections are, however, used as a starting point from which up-to-date projections can be developed.

<u>Natural Change</u>

6.33 Natural change is made up of births and deaths and the analysis above has shown a general downward trend over time. To project trends forward, the analysis looks at each of births and deaths separately and compares projected figures in the 2018-SNPP with actual recorded figures in the MYE.

6.34 The analysis also takes account of differences between the estimated population size and structure in the 2018-SNPP compared with ONS MYE (up to 2023). Overall, it is estimated that recent trends in fertility are slightly lower (around 5% lower than projected in 2018) and mortality rates are slightly higher (7% higher) when compared with data in the 2018-SNPP and so adjustments have been made on this basis.

Migration

6.35 The migration analysis looks separately at each of in- and out-migration and for internal and international migration, all data being considered by sex and single year of age.

6.36 Trend-based projections do not typically simply project trends forward and can vary year by year, in part relating to how the population of other areas is projected to change. The approach used is to look at migration trends in the 2018-23 period and compare these with figures projected back in the 2018-SNPP for the same period.

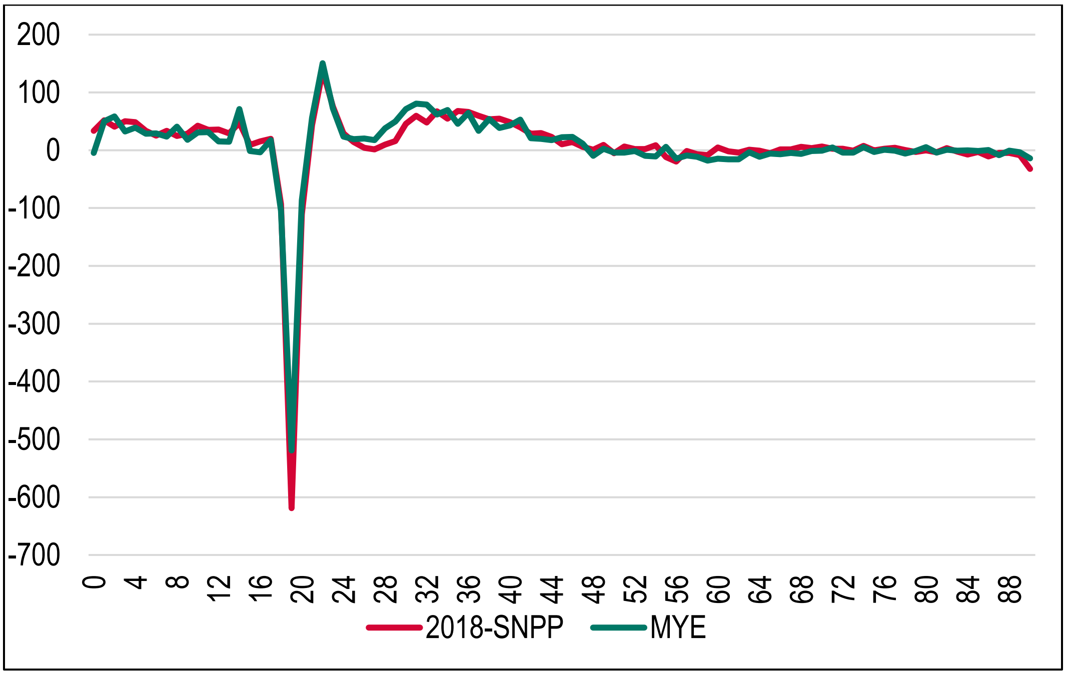
6.37 Adjustments are then made to migration numbers to provide a “best estimate” of a future projection based on recent trends. This method will provide a realistic view of projected migration in the absence of being able to develop a full matrix of moves at a national level (as ONS would do).

6.38 Although the migration modelling uses in- and out-migration separately, the figure below looks at net migration to highlight the differences between the trend recorded by ONS for the 2018-23 period and the projected net migration in the 2018-SNPP.

6.39 Overall, ONS recorded net migration (internal and international added together) at an average of 839 per annum, whilst the 2018-SNPP projected for there to be a similar level of net out-migration over the same period (an average of 826 per annum on average).

6.40 The figure below shows the age structure of net migration to be broadly similar in both the projections and the MYE with the main trend increase above projected figures being for people in their late 20s and early 30s. These differences are reflected in the trend-based projection developed below.

Figure 1.7: Age structure of net migration (2018-SNPP and MYE) – annual averages (2018-23) – Tonbridge & Malling



Source: ONS

<u>Population Projection Outputs</u>

6.41 The estimates of fertility, mortality and migration (including changes over time) have been modelled to develop a projection for the period to 2042 (the end of the plan period).

6.42 The projection outputs start from 2024, but as we only have ONS estimates to 2023 the data to get from 2023 to 2024 is also projected (on this trend-based position). The table below shows overall projected population growth of around 14,100 people – a 10% increase from 2024 levels.

Table 6.6 Projected population growth under a trend-based scenario – Tonbridge & Malling (2024-42)

	Population 2024	Population 2042	Change	% change
5-year trend	136,182	150,279	14,097	10.4%

Source: Iceni analysis

Household Projections

6.43 To understand what this means for housing need the population growth is translated into household growth using household representative rates and data about the communal (institutional) population. These have again been updated using data from the Census, with the table below summarising the assumptions used.

6.44 For the communal population, it is assumed actual numbers are held constant up to ages under 75, with the proportion of the population being used for 75+ age groups – this approach is consistent with typical ONS projections.

6.45 In interpreting the table below (by way of examples) the data shows around 5.8% of females aged 85-89 live in communal establishments (i.e. are not part of the household population) whilst around 76% of males aged 50-54 are considered to be a 'head of household' (where they are living in a household).

6.46 Generally, the HRRs increase by age, this is due to older people being more likely to live alone, often following the death of a spouse or partner.

Table 6.7 Communal Population and Household Representative Rates from 2021 Census – Tonbridge & Malling

Age	Communal population		Household Representative Rates	
	Male	Female	Male	Female
0 to 15	183	7	-	-
16 to 19	252	71	0.005	0.007
20 to 24	13	16	0.088	0.118
25 to 29	3	5	0.382	0.276
30 to 34	13	3	0.645	0.331
35 to 39	4	5	0.719	0.324
40 to 44	9	10	0.766	0.334
45 to 49	12	10	0.763	0.385
50 to 54	14	14	0.761	0.428
55 to 59	21	11	0.771	0.462
60 to 64	9	10	0.759	0.470
65 to 69	13	11	0.692	0.434
70 to 74	20	24	0.737	0.468
75 to 79	0.006	0.011	0.822	0.543
80 to 84	0.010	0.024	0.837	0.636
85 to 89	0.024	0.058	0.879	0.801
90 or over	0.056	0.161	0.919	0.900

Source: Derived from Census 2021 (mainly Tables CT 106 and 107)

6.47 For household representative rates (HRRs), the figures are calculated at the time of the Census. If ONS follow the method used in their most recent projections for future releases, then they are likely to build in the trend between the last three Census points (2001, 2011 and 2021). The figure below shows a summary analysis of the changes in HRRs by age.

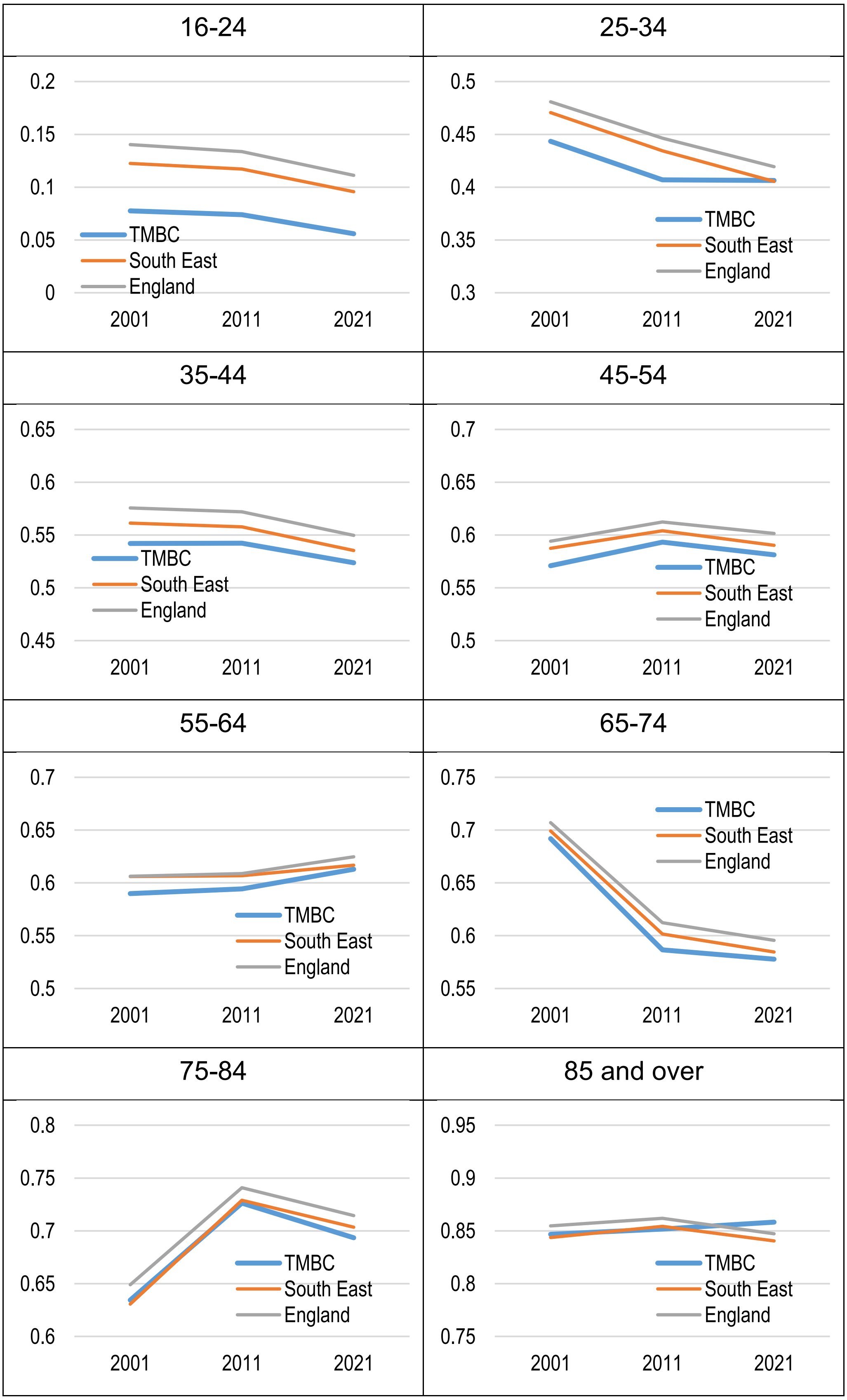
6.48 Arguably the key groups to look at are younger age groups where there may have been a degree of suppression in household formation (due to affordability) and this does appear to be the case in Tonbridge & Malling – particularly for those aged 25-34 and to a lesser extent 16-24 and 35-44.

6.49 Continuing this trend in the projection would therefore potentially build in further suppression and would not be a positive reaction to the Standard Method seeking to improve affordability.

6.50 For some older age groups there does also appear to be a trend of increasing or decreasing HRRs – particularly the 65-74 and 75-84 age groups (and mainly in the 2001-11 period).

6.51 For these age groups it is considered that the ‘trends’ are more likely to be due to cohort effects rather than any trend that should be modelled moving forward.

Figure 1.7: Change in household representative rates by age 2001-21



Source: ONS

6.52 The approach to HRRs taken in this report for the trend-based projection is to hold figures constant at the levels shown in the 2021 Census. However, when considering a higher housing need (linking to the Standard Method), the possibility of some increases for younger age groups is modelled (i.e. to reduce or reverse suppressed household formation) – this is discussed in relation to the Standard Method projection below.

6.53 Applying the HRRs to the trend-based population projection shows a projected increase of 7,800 households over the 2024-42 period, at an average of 434 per annum.

Table 6.8 Projected change in households – trend-based – Tonbridge & Malling

	Households 2024	Households 2042	Change in households	Per annum
5-year trend	55,386	63,196	7,810	434

Source: Iceni analysis

Developing a Projection linking to the Standard Method

6.54 As well as developing a trend-based projection, it is possible to consider the implications of housing delivery in line with the Standard Method. The analysis below looks at how the population might change if 1,090 homes are delivered per annum (noting that this has subsequently increased to 1,097 dpa).

6.55 A scenario has been developed that flexes migration to and from the Borough such that there is sufficient population for this level of additional homes to be filled each year.

6.56 In addition, as the Standard Method was only introduced in December 2024, the dwelling growth estimate for 2024-25 has been set at 910 (based on 8 months at 820 (the previous Standard Method) and 4 months at 1,090 (the new method[12])).

6.57 Within the modelling, migration assumptions have been changed so that across the Borough, the increase in households matches the housing need (including a standard 3% vacancy allowance). Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).

6.58 The analysis also considers that Planning Practice Guidance (PPG) was revised in December 2024, alongside the new Standard Method and provides some indication of why the Government sees a need to increase housing delivery[13]. Paragraph 006 (Reference ID: 2a-006-20241212) states:

'Why is an affordability adjustment applied?

An affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need because:

- *housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed*

- *people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.*

The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance

[12] Subsequently updated to 1,097 dpa

[13] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.'

6.59 The previous PPG also stated that an affordability uplift is required because *'household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live',* and it is arguably interesting that this has now been removed.

6.60 Essentially, the Government considers that by providing more homes, there is the opportunity for increased migration to an area to fill the homes, although the possibility (despite being removed from the PPG) for more households to form could also be a consideration.

6.61 In reality, there is a further possibility – that homes are built but not occupied (or at least the number of additional households in an area does not match the increase in homes).

6.62 The table below shows estimates from the Census of the number of vacant homes in the Borough. This does suggest the number of vacant properties has been increasing, although only by 82 homes between 2011 and 2021 (and a reduction in the percentage vacant). It should also be noted that vacancy rates in TMBC are low in a national context (6% vacancy across England in 2021 from the same Census source).

Table 6.9 Number of dwellings, households and vacant dwellings (2001, 2011 and 2021) – Tonbridge & Malling

	Dwellings	Households	Vacant	% vacant
2001	43,856	42,735	1,121	2.6%
2011	49,972	48,140	1,832	3.7%
2021	55,487	53,573	1,914	3.4%

Source: ONS (Census)

6.63 Given this analysis, there is no reason to believe the building of new homes in TMBC will lead to more vacant properties (or an increase in the vacancy rate). Changes to vacancies do not therefore, feature in the modelling other than to assume a standard 3% vacancy rate to allow for movement within the stock.

6.64 The modelling does, however, consider the possibility of additional housing delivery, allowing the opportunity for additional households to form (this being a consideration in the previous PPG).

6.65 For the Standard Method projection (at the time 1,090 dpa), it was modelled that HRRs for age groups up to 44 could return to the levels seen in 2001 (and shown on the figure above).

6.66 In developing this projection, a population increase of around 42,600 people is shown – a 31% increase and notably higher than the trend-based projection (which is shown in the table below for context.

Table 6.10 Projected population growth under a range of scenarios – Tonbridge & Malling (2024-42)

	Population 2024	Population 2042	Change	% change
5-year trend	136,182	150,279	14,097	10.4%
Standard Method (1,090 dpa)	136,182	178,781	42,599	31.3%

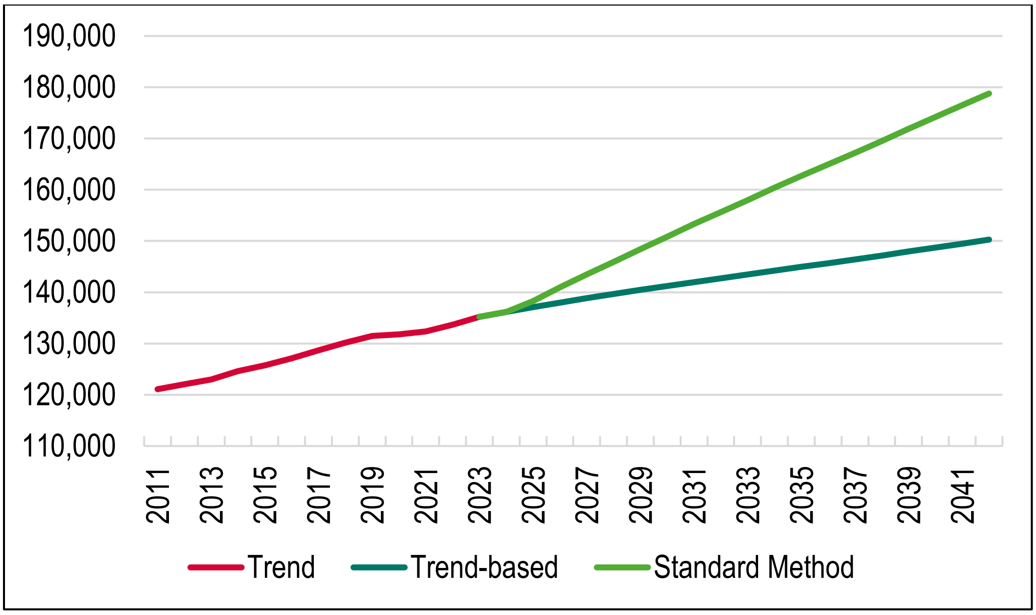
Source: Iceni analysis

6.67 Below are a series of charts showing past trends and projected population growth and key components of change for each of the projections developed. The first figure looks at overall population growth, before considering natural change and net migration.

6.68 The analysis suggests the population of Tonbridge & Malling could rise to 178,800 by 2042(up from 136,200 in 2024) a 31.3% increase, or 1.7% per annum.

6.69 For comparison, between 2011 and 2023, the population increased by an average of around 1.0% per annum, and so the Standard Method (using either number) would be projected to provide a boost in population growth.

Table 6.11 Past trends and projected population – Tonbridge & Malling

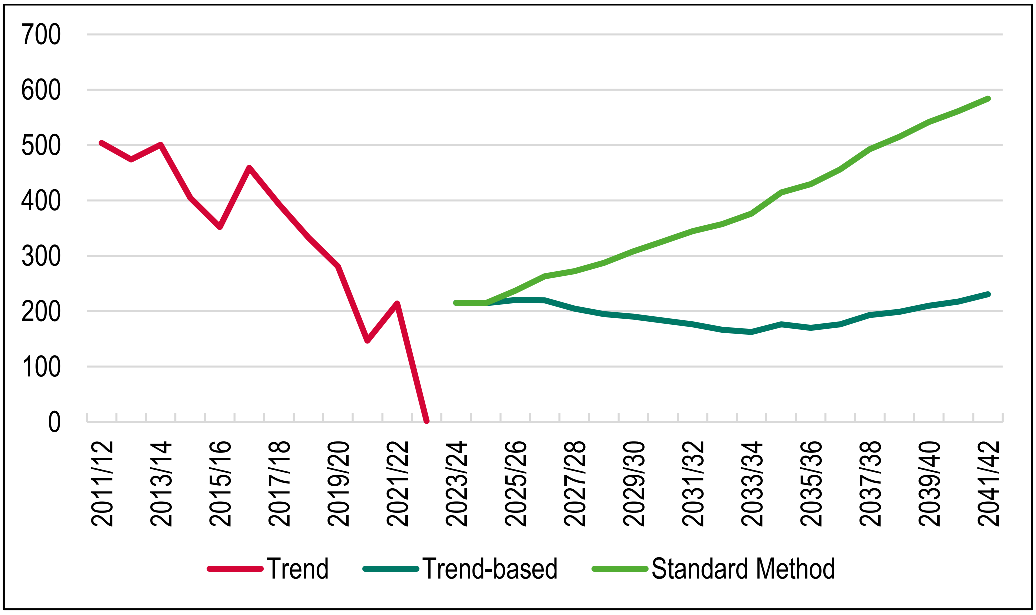


Source: ONS and Iceni analysis

6.70 The main reason for the higher population growth would be due to increased net in-migration, although the decline in natural change (births minus deaths) would also be projected to flatten off or reverse as the population rises (as there will be more females of childbearing age).

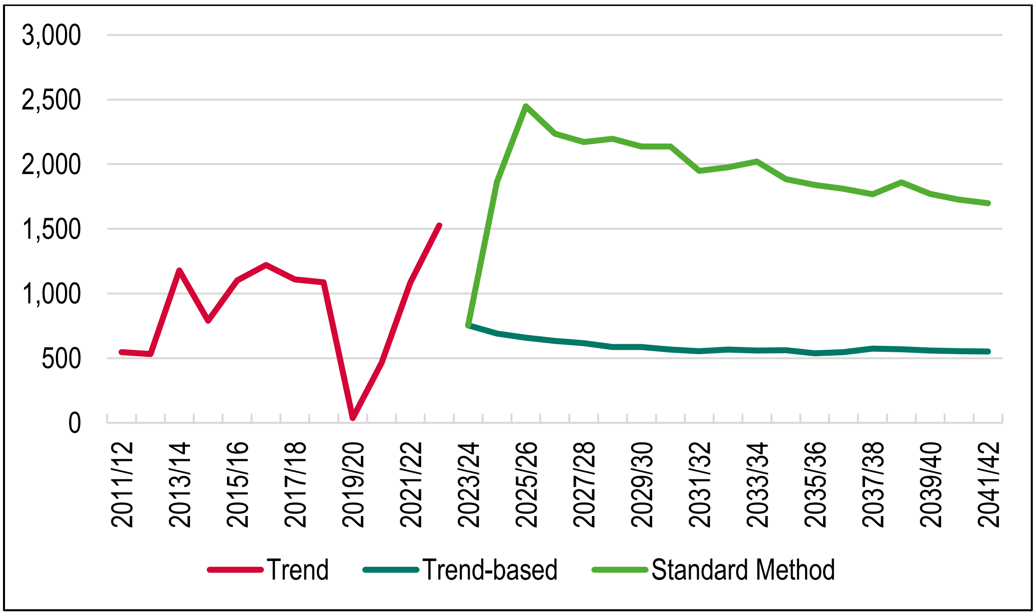
6.71 The figures below show projected natural change and net migration under the scenarios. Focussing on net migration, the analysis suggests that with higher delivery linked to the Standard Method (at the time 1,090 dpa), net migration would generally be at a level higher than typical past trends – indeed higher for every year than for any year back to at least 2011.

Table 6.12 Past trends and projected natural change – Tonbridge & Malling



Source: ONS and Iceni analysis

Table 6.13 Past trends and projected net migration – Tonbridge & Malling



Source: ONS and Iceni analysis

6.72 A final analysis compares age structure changes under each of these projections. In both cases, the projections show an ageing of the population and that with higher growth, there would be higher increases in the number of children and people of 'working-age' (16-64).

Table 6.14 Projected population change 2024 to 2042 by broad age bands – trend-based – Tonbridge & Malling

	2024	2042	Change in population	% change from 2024
Under 16	27,138	27,969	831	3.1%
16-64	82,581	88,898	6,317	7.6%
65 and over	26,463	33,412	6,949	26.3%
Total	136,182	150,279	14,097	10.4%

Source: Iceni analysis

Table 6.15 Projected population change 2024 to 2042 by broad age bands – Standard Method (1,090 dpa) – Tonbridge & Malling

	2024	2042	Change in population	% change from 2024
Under 16	27,138	34,602	7,464	27.5%
16-64	82,581	107,570	24,989	30.3%
65 and over	26,463	36,609	10,146	38.3%
Total	136,182	178,781	42,599	31.3%

Source: Iceni analysis

Relationship Between Housing and Economic Growth

6.73 The analysis to follow considers the relationship between housing and economic growth, seeking to understand what level of jobs might be supported by changes to the local labour supply (which will be influenced by population change).

6.74 To look at estimates of the job growth to be supported, a series of stages is undertaken. These can be summarised as:

- Estimate changes to the economically active population (this provides an estimate of the change in labour supply);

- Overlay information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment; and

- Bringing together this information will provide an estimate of the potential job growth supported by the population projections.

Growth in Resident Labour Supply

6.75 The approach taken in this report is to derive a series of age and sex specific economic activity rates and use these to estimate how many people in the population will be economically active as projections develop. This is a fairly typical approach with data being drawn in this instance from the Office for Budget Responsibility (OBR) – July 2018 (Fiscal Sustainability Report) – this data has then been rebased to information in the 2021 Census (on age, sex and economic activity).

6.76 The table below shows the assumptions made for the Borough. The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision).

Table 6.16 Projected changes to economic activity rates (2024 and 2042) – Tonbridge & Malling

	Males			Females		
	2024	2042	Change	2024	2042	Change
16-19	36.0%	36.5%	0.5%	39.9%	40.3%	0.4%
20-24	85.4%	85.4%	0.0%	81.1%	81.1%	0.0%
25-29	92.2%	92.2%	0.0%	83.7%	83.7%	0.0%
30-34	93.4%	93.4%	0.0%	82.8%	82.8%	0.0%
35-39	93.3%	93.2%	-0.1%	81.5%	82.4%	0.9%
40-44	93.6%	92.7%	-0.9%	84.5%	86.6%	2.1%
45-49	92.7%	91.5%	-1.2%	83.0%	86.5%	3.5%
50-54	89.2%	88.4%	-0.8%	80.3%	84.3%	4.0%
55-59	83.9%	83.2%	-0.7%	72.3%	74.7%	2.3%
60-64	72.3%	76.9%	4.6%	58.2%	63.9%	5.7%
65-69	36.1%	47.9%	11.8%	26.8%	38.6%	11.9%
70-74	14.6%	17.5%	3.0%	8.0%	14.3%	6.3%
75-89	5.2%	5.7%	0.4%	3.0%	5.6%	2.6%

Source: Based on OBR and Census (2021) data

6.77 In addition, a sensitivity scenario has been developed where the EARs are held constant at 2021 levels. It is considered the sensitivity is reasonable given data (including from the Census) has shown activity rates to have not grown as they had previously been forecast to do.

6.78 Working through an analysis of age and sex specific economic activity rates, it is possible to estimate the overall change in the number of economically active people in the area – this is set out in the table below (linking to the 5-year trend-based projections and the Standard Method (1,090 dpa)).

6.79 The analysis shows that a trend-based projection results in growth in the economically active population of up to 8,500 people – a 12.3% increase. With the Standard Method (at the time 1,090 dpa), the increase in the economically active population is projected to be up to 24,600.

Table 6.17 Estimated change to the economically active population (2024-42) – Tonbridge & Malling

		Economically active (2024)	Economically active (2042)	Total change in economically active	% change
Trend-based	OBR EAR	69,261	77,810	8,550	12.3%
	EAR no change	68,717	74,679	5,962	8.7%
Standard Method (1,090 dpa)	OBR EAR	69,261	93,874	24,613	35.5%
	EAR no change	68,717	90,359	21,642	31.5%

Source: Iceni Analysis

<u>Linking Changes in Resident Labour Supply to Job Growth</u>

6.80 The analysis above has set out potential scenarios for the change in the number of people who are economically active. However, it is arguably more useful to convert this information into an estimate of the number of jobs this would support. The number of jobs and resident workers required to support these jobs will differ depending on three main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);

- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs; and

- Unemployment – if unemployment were to fall then the growth in the economically active population would not need to be as large as the growth in jobs (and vice versa).

Commuting Patterns

6.81 The table below shows summary data about commuting to and from Tonbridge & Malling from the 2011 and 2021 Census. Data from both sources is used as the 2011 data is quite old, but the 2021 data could be influenced by the COVID-19 pandemic.

6.82 Overall, from both sources the data shows a very modest level of net in-commuting (around 0.3% fewer people living in the Borough and working than work in the Borough in 2011 (a figure of 2.2% in 2021). This is shown as the commuting ratio in the final row of the table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live).

6.83 When comparing the two sources, it is worth reflecting on a large increase in the number of home workers (or those of no fixed workplace) in 2021 compared with 2011. In 2011, a total of 12,200 people were recorded as home workers or with no fixed workplace; in 2021 this figure had nearly tripled (to 33,600).

6.84 As the country has moved away from the pandemic, it is possible this figure has started to reduce slightly, with possible implications on commuting dynamics. Although at the same time, recent ONS data has shown that hybrid working has increased since the pandemic.

Table 6.18 Commuting Patterns – Tonbridge & Malling

	2011	2021
Live and Work in Borough	17,501	11,585
Home Workers or No Fixed Workplace	12,201	33,610
In Commute	30,778	20,683
Out Commute	30,624	19,233
Total Working in LA	60,480	65,878
Total Living in LA and Working Anywhere	60,326	64,428
Commuting Ratio	0.997	0.978

Source: Census 2011, 2021

6.85 Given the commuting ratios are both close to one, the assumption used below is that there is a balanced (1:1) commuting ratio (i.e. the increase in the number of people working in the area is equal to the number of people living in the area who are working).

Double Jobbing

6.86 The analysis also considers that some people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs.

6.87 Data from the Annual Population Survey (available on the NOMIS website) for the past 5 years (for which data exists) suggests across Tonbridge & Malling that typically about 4.3% of workers have a second job.

6.88 It has therefore been assumed that around 4.3% of people will have more than one job moving forward – this means the number of jobs supported by the workforce will be around 4.3% higher than workforce growth. It has been assumed in the analysis that the level of double jobbing will remain constant over time.

Unemployment

6.89 The last analysis when looking at the link between jobs and resident labour supply is a consideration of unemployment. Essentially, this is considering if there is any latent labour force that could move back into employment to take up new jobs.

6.90 The latest model-based unemployment data from the Annual Population Survey (for October 2023-September 2024) puts unemployment at around 2.6% which is a level that might be considered as full employment (noting there will always be some level of unemployment as people enter the labour market or move between jobs). No further adjustment is made to the data to take account of unemployment.

Jobs Supported by Growth in the Resident Labour Force

6.91 The tables below show how many additional jobs might be supported by population growth under the different projection scenarios. It is estimated under the trend-based projection that between 6,200 and 8,900 additional jobs could be supported, and with the Standard Method (1,090 dpa), this range is higher (between 22,600 and 25,700 additional jobs) – all figures for the 2024-42 period.

Table 6.19 Jobs supported by demographic projections (2024-42) – Tonbridge & Malling

		Total change in economically active	Allowance for double jobbing	Allowance for net commuting (= jobs supported)
Trend-based	OBR EAR	8,550	8,934	8,934
	EAR no change	5,962	6,230	6,230
Standard Method (1,090 dpa)	OBR EAR	24,613	25,719	25,719
	EAR no change	21,642	22,615	22,615

Source: Iceni analysis

Housing Need Summary

6.92 The Standard Method for assessing housing need sets a figure of 1,090 dwellings per annum for Tonbridge and Malling. This was subsequently updated to 1,097 dpa in May 2025.

6.93 However, we consider that this change is not material to the main findings of this report which was largely prepared in April 2025 remain valid.

6.94 A key reason for the Government seeking higher housing figures is that worsening affordability is evidence that supply is failing to keep up with demand.

6.95 We have developed a population projection linked to the delivery of 1,090 dpa across the plan period to 2042. This shows that population growth in the borough could exceed 42,500 people, 6.96 This population growth is around triple the rate of projections based on the trends over the last 5 years, a period when housing delivery has been high.

6.97 Indicating that if TMBC were to begin delivering housing in line with the standard method (using either number) that the population growth would be significantly higher than that seen in recent years.

6.98 Taking into account economic activity rates, this level of population growth would also support up to 27,500 jobs.

6.99 In moving forward, this report bases key analysis on this level of population growth (e.g. analysis around housing mix and older person needs).

7. Affordable Housing Need

Introduction

7.1 This section provides an assessment of the need for affordable housing in Tonbridge & Malling. The analysis follows the methodology set out in Planning Practice Guidance (Sections 2a-018 to 2a-024). The analysis looks at the need from households unable to buy OR rent housing; and also, from households able to rent but not buy who may generate a need for affordable home ownership products.

Affordable Housing Sector Dynamics

7.2 The 2021 Census indicated that 15% of households in Tonbridge & Malling lived in social or affordable rented homes, with the sector accommodating around 8,300 households.

7.3 Data from the Regulator of Social Housing (RSH) for 2024 indicates that Private Registered Providers (PRPs) owned 9,800 properties in the Council area, of which 80% were for general needs rent; 8% supported housing or housing for older people; and 12% low cost home-ownership homes (such as shared ownership properties). The majority of general needs homes are rented out at social rents (84%) and the rest at affordable rents.

Table 7.1 Stock owned or Managed by PRPs – Tonbridge & Malling

	Total	% of stock
General needs rented	7,864	80.4%
Supported/older persons housing	756	7.7%
Low cost home ownership	1,167	11.9%
Total	9,787	100.0%

Source: RSR Geographical Look-Up Tool 2024

7.4 As of April 2024, there were 164 households on the Council's Housing Register, as well as a number of households awaiting their application to be processed. In addition, data for September 2024 shows there were 143 households accommodated in temporary accommodation (some 59% (85 households) of these being households with children).

Overview of Method

7.5 In summary, the methodology looks at a series of stages as set out below:

- Current affordable housing need (annualised so as to meet the current need over a period of time);
- Projected newly forming households in need;
- Existing households falling into need; and
- Supply of affordable housing from existing stock.

7.6 The first three bullet points above are added together to identify a gross need, from which the supply is subtracted to identify a net annual need for additional affordable housing. Examples of different affordable housing products are outlined in the box below.

Affordable Housing Definitions

Social Rented Homes – are homes owned by local authorities or private Registered Providers for which rents are determined by the national rent regime (through which a formula rent is determined by the relative value and size of a property and relative local income levels). They are low cost rented homes.

Affordable Rented Homes – are let by local authorities or private registered providers (PRPs) to households who are eligible for social housing. Affordable rents are set at no more than 80% of the local market rent (including service charges).

Rent-to-Buy – where homes are offered, typically by PRPs, to working households at an intermediate rent which does not exceed 80% of the local market rent (including service charges) for a fixed period after which the household has the chance to buy the home.

Shared Ownership – an affordable home ownership product where residents own a share of their home, on which they typically pay a mortgage; with a PRP owning the remainder, on which they pay a subsidised rent.

Discounted Market Sale – a home which is sold at a discount of at least 20% below local market value to eligible households; with provisions in place to ensure that housing remains at a discount for future households (or the subsidy is recycled).

First Homes – a form of discounted market sale whereby an eligible First-time Buyer can buy a home at a discount of at least 30% of market value. Councils are able to set the discounts and local eligibility criteria out in policies.

Affordability

7.7 An important first part of the affordable needs modelling is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need'.

7.8 For the purposes of establishing affordable housing need, the analysis focuses on overall housing costs (for all dwelling types and sizes).

7.9 The table below shows estimated current prices to both buy and privately rent a lower quartile home in the Borough (excluding newbuild sales when looking at house prices). Across all dwelling sizes the analysis points to a lower quartile price of £310,000 and a private rent of £1,400 per month.

Table 7.2 Estimated lower quartile cost of housing to buy (existing dwellings) and privately rent (by size) – Tonbridge & Malling

	To buy	Privately rent
1-bedroom	£170,000	£950
2-bedrooms	£255,000	£1,400
3-bedrooms	£360,000	£1,625
4-bedrooms	£475,000	£2,350
All dwellings	£310,000	£1,400

Source: Land Registry and Internet Price Search

7.10 The table below shows how prices and rents vary by location. The analysis shows some variation in prices and rents, with prices (and rents) estimated to be highest in Malling & Kings Hill and the Rural area. The lowest prices and rents are seen in the Medway Facing and Aylesford & Larkfield sub-areas.

Table 7.3 Lower Quartile Prices and Market Rents, by sub-area

	Lower quartile price (existing dwellings)	Lower Quartile rent, pcm
Aylesford & Larkfield	£280,000	£1,375
Malling & Kings Hill	£360,000	£1,550
Medway Facing	£270,000	£1,375
Rural	£360,000	£1,525
Tonbridge	£330,000	£1,400
TMBC	£310,000	£1,400

Source: Land Registry and Internet Price Search

7.11 Next, it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy).

7.12 Data about total household income has been based on ONS modelled income estimates, with additional data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes. Data has also been drawn from the Annual Survey of Hours and Earnings (ASHE) to consider changes since the ONS data was published.

7.13 Overall, the average (mean) household income across Tonbridge & Malling is estimated to be around £65,000, with a median income of £54,700; the lower quartile income of all households is estimated to be £31,400. There are some differences between areas with the range of median incomes going from £50,000 in Aylesford & Larkfield, up to £61,200 in Malling & Kings Hill.

Table 7.4 Estimated average (median) and lower quartile household income

	Median income	Median as a % of the Borough average	Lower quartile income
Aylesford & Larkfield	£50,000	91%	£28,700
Malling & Kings Hill	£61,200	112%	£35,100
Medway Facing	£53,000	97%	£30,400
Rural	£57,300	105%	£32,900
Tonbridge	£55,600	102%	£31,900
TMBC	£54,700	-	£31,400

Source: Iceni analysis

7.14 To assess affordability, two different measures are used; firstly, to consider what income levels are likely to be needed to access private rented housing, and secondly, to consider what income level is needed to access owner occupation.

7.15 This analysis, therefore, brings together the data on household incomes with the estimated incomes required to access private sector housing. For the purposes of analysis, the following assumptions are used:

- Rental affordability – a household should spend no more than 35% of their income on rent; and
- Mortgage affordability – assume a household has a 10% deposit and can secure a mortgage for four and a half times (4.5×) their income.

Need for Affordable Housing

7.16 The sections below work through the various stages of analysis to estimate the need for affordable housing in the Borough and sub-areas.

Final figures are provided as an annual need (including an allowance to deal with current need). As per 2a-024 of the PPG, this figure can then be compared with the likely delivery of affordable housing.

Current Need

7.17 In line with PPG paragraph 2a-020, the current need for affordable housing has been based on considering the likely number of households with one or more housing problems (housing suitability). The table below sets out the categories in the PPG and the sources of data being used to establish numbers.

Table 7.5 Main sources for assessing the current need for affordable housing

	Source	Notes
Homeless households (and those in temporary accommodation)	MHCLG Statutory Homelessness data	Household in temporary accommodation at end of quarter
Households in overcrowded housing	2021 Census table RM099	Analysis undertaken by tenure
Concealed Households	2021 Census table RM009	Number of concealed families with children
Existing affordable housing tenants in need	Modelled data linking to past survey analysis	Excludes overcrowded households
Households from other tenures in need	Modelled data linking to past survey analysis	Excludes overcrowded households

Source: PPG [Paragraph: 020 Reference ID: 2a-020-20190220]

7.18 The table below sets out estimates of the number of households within each category. This shows an estimated 2,900 households as living in ‘unsuitable housing’, with 35% of these being in Tonbridge. Around 420 of these (across the Borough) currently have no accommodation (homeless or concealed households).

Table 7.6 Estimated number of households living in unsuitable housing (or without housing)

	Concealed and homeless households	Households in overcrowded housing	Existing affordable housing	Households from other tenures in need	TOTAL
Aylesford & Larkfield	141	388	53	256	838
Malling & Kings Hill	54	178	26	120	379
Medway Facing	30	80	9	80	199
Rural	86	179	24	176	465
Tonbridge	110	521	67	337	1,035
TMBC	422	1,346	180	969	2,916

Source: Iceni analysis (numbers may not sum due to rounding)

7.19 In taking this estimate forward, the data modelling next estimates the need by tenure and considers affordability. It is estimated that around 60% of those households identified above are unlikely to be able to afford market housing; therefore, an estimated current affordable housing need of around 1,750 households.

7.20 From this estimate, households currently living in affordable housing are excluded (as these households would release a dwelling on moving and so no net need for affordable housing will arise) and the total current need is estimated to be 986 households.

7.21 For the purposes of analysis, it is assumed that the Council would seek to meet this need over a period of time. Given that this report typically looks at needs in the period from 2024 to 2042, the need is annualised by dividing by 18 (to give an annual need for around 55 dwellings to satisfy only those who are currently in need of housing).

7.22 This does not mean that some households would be expected to wait 18-years for housing as the need is likely to be dynamic, with households leaving the current need as they are housed but with other households developing a need over time.

7.23 The table below shows this data for five sub-areas – this is split between those unable to Rent OR buy and those able to rent but NOT buy. Given the pricing of housing in Tonbridge & Malling, this analysis shows a more modest need for those able to rent but not buy and in all cases the number unable to rent OR buy is notably higher.

Table 7.7 Estimated current affordable housing need by affordability

	Number in need (excluding those in AH)	Annualised		
		TOTAL	Unable to rent OR buy	Able to rent but NOT buy
Aylesford & Larkfield	276	15	14	1
Malling & Kings Hill	116	6	6	1
Medway Facing	62	3	3	0
Rural	189	11	9	1
Tonbridge	343	19	16	3
TMBC	986	55	48	7

Source: Iceni analysis

Projected Housing Need

7.24 Projected need is split between newly forming households who are unable to afford market housing and existing households falling into need. For newly forming households, a link is made to demographic modelling, with an affordability test also being applied.

7.25 Overall, it is estimated that 1,111 new households would form each year and around two-thirds will be unable to afford market housing; this equates to a total of 727 newly forming households that will have a need per annum on average – the majority are households unable to rent OR buy.

Table 7.8 Estimated Need for Affordable Housing from Newly Forming Households (per annum)

	Number of new households	% unable to afford market housing	Annual newly forming households unable to afford market housing	Unable to rent OR buy (per annum)	Able to rent but NOT buy (per annum)
Aylesford & Larkfield	345	63.8%	220	187	33
Malling & Kings Hill	136	66.2%	90	68	22
Medway Facing	105	58.7%	62	54	8
Rural	169	69.7%	118	89	29
Tonbridge	356	66.8%	238	176	61
TMBC	1,111	65.5%	727	574	153

Source: Projection Modelling/Affordability Analysis

7.26 The second element of the newly arising need is existing households falling into need. To assess this, information about households entering the social/affordable rented sector housing has been used to represent the flow of households onto the Housing Register over this period.

7.27 Following the analysis through suggests a need arising from 99 existing households each year – again most are households unable to buy OR rent.

Table 7.9 Estimated Need for affordable housing from Existing Households Falling into Need (per annum)

	Total Additional Need	Unable to rent OR buy	Able to rent but NOT buy
Aylesford & Larkfield	24	22	2
Malling & Kings Hill	12	10	2
Medway Facing	7	6	0
Rural	18	15	3
Tonbridge	39	33	6
TMBC	99	87	13

Source: Iceni analysis

Supply of Affordable Housing Through Relets/Resales

7.28 The future supply of affordable housing through relets is the flow of affordable housing arising from the existing stock that is available to meet future need. This focusses on the annual supply of social/affordable rent relets. Information from a range of sources (mainly CoRe and LAHS) has been used to establish past patterns of social housing turnover. Data for three-years has been used (2021-22 to 2023-24).

7.29 The figures are for general needs lettings but exclude lettings of new properties and also exclude an estimate of the number of transfers from other social rented homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock. On the basis of past trend data is has been estimated that 176 units of social/affordable rented housing are likely to become available each year moving forward.

Table 7.10 Analysis of Past Social/Affordable Rented Housing Supply, 2021/22 – 2023/24 (average per annum) – Tonbridge & Malling

	Total Lettings	% as Non-New Build	Lettings in Existing Stock	% Non-Transfers	Lettings to New Tenants
2021/22	363	84.6%	307	54.0%	166
2022/23	283	86.9%	246	63.6%	156
2023/24	416	77.4%	322	63.5%	204
Average	354	82.4%	292	60.3%	176

Source: CoRe/LAHS

7.30 It is also possible to consider if there is any supply of affordable home ownership products from the existing stock of housing. One source is likely to be resales of affordable home ownership products with data from the Regulator of Social Housing showing a total stock in 2024 of 1,167. If these homes were to turnover at a rate of around 5% then they would be expected to generate around 58 resales each year. These properties would be available for these households and can be included as the potential supply.

7.31 The table below shows the estimated supply of affordable housing from relets/resales in each sub-area.

Table 7.11 Estimated supply of affordable housing from relets/resales of existing stock by local authority (per annum)

	Social/affordable rented	AHO	TOTAL
Aylesford & Larkfield	52	18	70
Malling & Kings Hill	26	8	33
Medway Facing	9	6	15
Rural	24	6	30
Tonbridge	66	20	86
TMBC	176	58	234

Source: CoRe/LAHS

7.32 The PPG model also includes the bringing back of vacant homes into use and the pipeline of affordable housing as part of the supply calculation. These have, however, not been included within the modelling in this report.

7.33 Firstly, there is no evidence of any substantial stock of vacant homes (over and above a level that might be expected to allow movement in the stock).

7.34 Secondly, with the pipeline supply, it is not considered appropriate to include this as to net off new housing would be to fail to show the full extent of the need, although in monitoring it will be important to net off these dwellings as they are completed.

Net Need for Affordable Housing

7.35 The table below shows the overall calculation of affordable housing need. The analysis shows that there is a need for 647 dwellings per annum across the study area – an affordable need is seen in all sub-areas. The net need is calculated as follows:

Net Need = Current Need (allowance for) + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

Table 7.12 Estimated Need for Affordable Housing (per annum)

	Current need	Newly forming house-holds	Existing house-holds falling into need	Total Gross Need	Relet/ resale supply	Net Need
Aylesford & Larkfield	15	220	24	260	70	190
Malling & Kings Hill	6	90	12	108	33	75
Medway Facing	3	62	7	72	15	57
Rural	11	118	18	146	30	117
Tonbridge	19	238	39	295	86	209
TMBC	55	727	99	881	234	647

Source: Iceni analysis

7.36 This can additionally be split between households unable to afford to BUY or rent and those able to rent but not buy. For this analysis, it is assumed that the AHO supply would be meeting the needs of the latter group, although in reality, there will be a crossover between categories.

7.37 For example, it is likely in some cases that the cost of shared ownership will have an outgoing below that for privately renting and could meet some of the need from households unable to buy or rent – the issue of access to deposits would still be a consideration.

7.38 The table below shows the affordable need figure split between the two categories. Across the whole Borough, the analysis shows around 82% of households as being unable to buy OR rent, with this figure varying from 76% in Tonbridge, up to 96% in the Medway Facing area – the differences are largely driven by the pricing of housing in different locations.

Table 7.13 Estimated Need for Affordable Housing (per annum) – split between different affordability groups

	Unable to buy OR rent	Able to rent but not buy	TOTAL	% unable to buy OR rent
Aylesford & Larkfield	171	18	190	90%
Malling & Kings Hill	57	17	75	77%
Medway Facing	55	2	57	96%
Rural	90	27	117	77%
Tonbridge	159	50	209	76%
TMBC	532	115	647	82%

Source: Iceni analysis

7.39 These figures can also be standardised based on the size of each location (in this case linked to the number of households shown in the 2021 Census). This shows broadly similar levels of need in all areas (very slightly lower in Malling & Kings Hill).

Table 7.14 Standardised level of affordable housing need

	Net Need	Estimated households (2021)	Net need per 1,000 house-holds
Aylesford & Larkfield	190	15,070	12.6
Malling & Kings Hill	75	6,998	10.7
Medway Facing	57	4,538	12.5
Rural	117	9,595	12.1
Tonbridge	209	17,335	12.1
TMBC	647	53,536	12.1

Source: Iceni analysis

7.40 Whilst the need above is provided down to sub-area level, it should be remembered that affordable need can be met across the area as and when opportunities arise, and so specific sub-area data should not be treated as a local target.

Affordable Need and Overall Housing Numbers

7.41 The PPG encourages local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. Specifically, the wording of the PPG (housing and economic needs) Ref ID 2a-024 states:

"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes"

7.42 However, the relationship between affordable housing need and overall housing need is complex. This was recognised in the Planning Advisory Service (PAS) Technical Advice Note of July 2015[14]. PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need. There are a number of reasons why the two cannot be 'arithmetically' linked.

7.43 Firstly, the modelling contains a category in the projection of 'existing households falling into need'; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is, therefore, no net additional need arising.

7.44 The modelling also contains 'newly forming households'; these households are a direct output from demographic modelling and are therefore already included in overall housing need figures (a point also made in the PAS advice note – see paragraph 9.5).

[14] https://www.local.gov.uk/sites/default/files/documents/objectively-assessed-need-9fb.pdf. While the technical note produced by PAS is arguably becoming dated, there is no more up-to-date guidance on this matter from a Government source and the remarks remain valid.

7.45 The analysis estimates an annual need for 532 affordable homes for households unable to buy OR rent housing who are not already living in accommodation. However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else).

7.46 It is possible to investigate this in some more detail by re-running the model and excluding those already living in accommodation. This is shown in the table below which identifies that meeting these needs would lead to an affordable need for 422 homes per annum across the study area – 79% of the figure when including those with housing.

7.47 This figure is, however, theoretical and should not be seen to be minimising the need (which is clearly acute). That said, it does serve to show that there is a difference in the figures when looking at overall housing shortages.

7.48 The analysis is arguably even more complex than this – it can be observed that the main group of households in need are newly forming households. These households are already included within demographic projections and so demonstrating a need for this group again should not be seen as additional to overall figures from demographic projections.

Table 7.15 Estimated Need for Affordable Housing (households unable to buy OR rent) excluding households already in accommodation

	Including existing households	Excluding existing households
Current need	48	23
Newly forming households	574	574
Existing households falling into need	87	0
Total Gross Need	708	597
Re-let Supply	176	176
Net Need	532	422

Source: Iceni analysis

7.49 Additionally, it should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e., needing to spend more than 35% of income on housing).

7.50 In reality, some (possibly many) households would see their circumstances change over time such that they would 'fall out of need' and this is not accounted for in the analysis.

7.51 One example would be a newly forming household with an income level that means they spend more than 35% of income on housing. As the household's income rises, they would potentially pass the affordability test and therefore not have an affordable need.

7.52 Additionally, there is the likelihood when looking over the longer-term that a newly forming household will become an existing household in need and would be counted twice if trying to multiply the figures out for a whole plan period.

7.53 It also needs to be remembered that the affordability test used for analysis is based on assuming a household spends no more than 35% of their income on housing (when privately renting). In reality, many households will spend more than this and so would be picked up by modelling as in need, but in fact are paying for a private sector tenancy.

7.54 The English Housing Survey (2022-23) estimates private tenants are paying an average of 32% of income on housing (including benefit support) with an ONS report from October 2024 putting the figure at 34%, and this would imply that approaching half are spending more than the affordable level assumed in this report.

7.55 A further consideration is that some 115 of the 647 per annum affordable need is a need for affordable home ownership. Technically, these households can afford market housing (to rent) and historically would not have been considered as having a need in assessments such as this – until recently, only households unable to buy OR rent would be considered as having a need for affordable housing. For these reasons, those households have not been included in the analysis looking at households with and without accommodation.

7.56 Finally, it should be recognised that Planning Practice Guidance does not envisage that all needs will be met (whether this is affordable housing or other forms of accommodation such as for older people). Paragraph 67-001 of housing needs of different groups states:

"This guidance sets out advice on how plan-making authorities should identify and plan for the housing needs of particular groups of people. This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method".

The Role of the Private Rented Sector (PRS)

7.57 The discussion above has already noted that the need for affordable housing does not generally lead to a need to increase overall housing provision. However, it is worth briefly thinking about how affordable need works in practice and the housing available to those unable to access market housing without Housing Benefit. In particular, the role played by the Private Rented Sector (PRS) in providing housing for households who require financial support in meeting their housing needs should be recognised.

7.58 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF (other than affordable private rent which is a specific tenure separate from the main 'full market' PRS), it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need.

7.59 Government recognises this and indeed legislated through the 2011 Localism Act to allow Councils to discharge their "homelessness duty" through providing an offer of a suitable property in the PRS. Equally the Council have difficulties in doing this due to the unaffordability of the sector within TMBC as well as lack of security of tenure able to be offered.

7.60 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of November 2024, it is estimated that there were around 2,100 benefit claimants in the Private Rented Sector in Tonbridge & Malling. From this, it is clear that the PRS contributes to the wider delivery of 'affordable homes' with the support of benefit claims.

7.61 Whilst the PRS is providing housing for some households, there are however significant risks associated with future reliance on the sector to address the needs of those that are technically in Affordable Housing need.

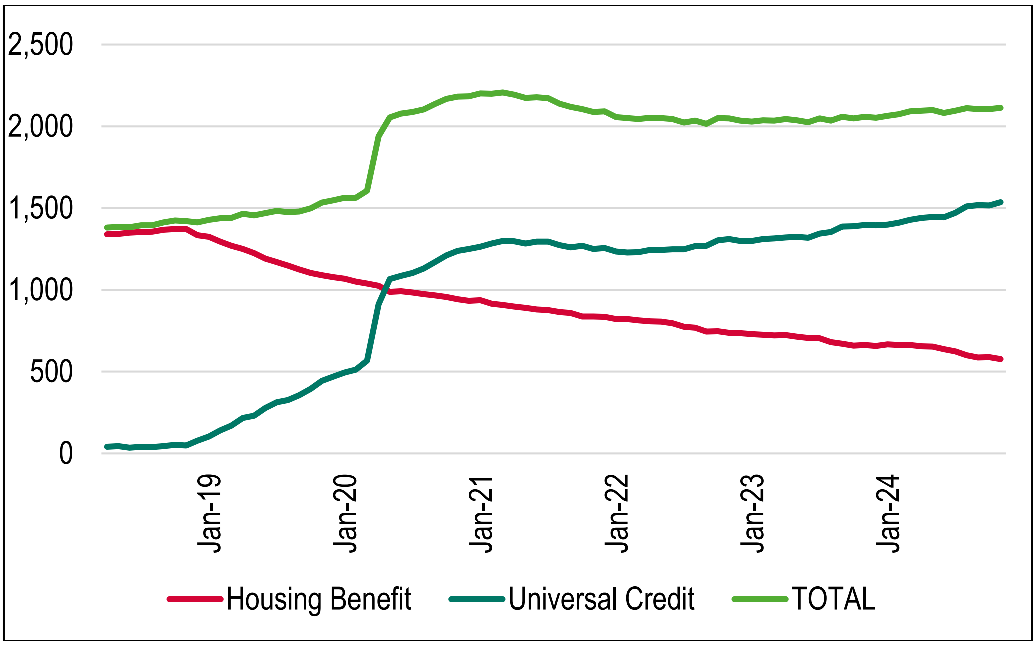
7.62 The last couple of years have seen rents increase whilst Local Housing Allowance (LHA) levels have remained static. In the Autumn Statement 2023, the then Government increased the LHA rent to the 30th percentile of market rents (although this is based on existing rents and not rents likely to be payable by those moving home); Universal Credit will also rise. However, demand pressure could nonetheless have some impact of restricting future supply of PRS properties to those in need; emphasising the need to support delivery of genuinely affordable homes.

7.63 The figure below shows the trend in the number of claimants in the Council area. This shows there has been a notable increase since March 2020, which is likely to be related to the Covid-19 pandemic. However, even the more historical data shows a substantial number of households claiming benefit support for their housing in the private sector (typically around 1,500 households).

7.64 The data about the number of claimants does not indicate how many new lettings are made each year in the PRS. However, data from the English Housing Survey (EHS) over the past three years indicates that nationally around 7% of private sector tenants are new to the sector each year. If this figure is applied to the number of households claiming HB/UC then this would imply around 150 new benefit supported lettings in the sector.

7.65 Whilst we would not recommend including PRS supply as part of the modelling, not least as it is uncertain whether the availability of homes will remain at this level as well as concerns about the security of tenure, it is the case that the sector does provide housing and again the overall analysis does not point to the need to increase overall provision.

Figure 7.1 Number of Housing Benefit/Universal Credit claimants in the PRS



Source: Department of Work and Pensions

7.66 Whilst housing delivery through the Local Plan can be expected to secure additional affordable housing it needs to be noted that delivery of affordable housing through planning obligations is an important, but not the only means, of delivering affordable housing; and the Councils should also work with housing providers to secure funding to support enhanced affordable housing delivery on some sites and through use of its own land assets.

7.67 Overall, it is difficult to link the need for affordable housing to the overall housing need; indeed, there is no justification for trying to make the link. Put simply the two do not measure the same thing and in interpreting the affordable need figure, consideration needs to be given to the fact that many households already live in housing, and do not therefore generate an overall net need for an additional home. Further issues arise as the need for affordable housing is complex and additionally the extent of concealed and homeless households needs to be understood as well as the role played by the private rented sector.

7.68 Regardless of the discussion above, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the study area. It does, however, need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

Types of Affordable Housing

7.69 The analysis above has clearly pointed to a need for affordable housing, and particularly for households who are unable to buy OR rent in the market. There are a range of affordable housing options that could meet the need which will include rented forms of affordable housing (such as social or affordable rents) and products which might be described as intermediate housing (such as shared ownership or discounted market housing/First Homes). These are discussed in turn below.

Social and Affordable Rented Housing

7.70 The table below shows current rent levels in the Borough for a range of products along with relevant local housing allowance (LHA) rates. Parts of Tonbridge & Malling fall into three different Broad Rental Market Areas (BRMA) for the purposes of LHA (High Weald, Maidstone and Medway & Swale) and the table shows the range of values across the whole Borough.

7.71 Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile market rents. This analysis shows that social rents are significantly lower than affordable rents; the analysis also shows that affordable rents are well below lower quartile market rents – particularly for larger property sizes.

7.72 The LHA rates for all sizes of home are below lower quartile market rents for all sizes of accommodation. This does potentially mean that households seeking accommodation in many locations may struggle to secure sufficient benefits to cover their rent.

Table 7.16 Comparison of rent levels for different products – Tonbridge & Malling

	Average Social rent	Average Affordable rent (AR)	Lower quartile (LQ) market rent	LHA range
1-bedroom	£467	£576	£950	£673-£798
2-bedrooms	£545	£763	£1,400	£848-£1,072
3-bedrooms	£612	£855	£1,625	£937-£1,319
4-bedrooms	£687	£1,195	£2,350	£1,296-£1,820
ALL	£564	£740	£1,400	-

Source: RSH and VOA

7.73 To some extent it is easier to consider the data above in terms of the percentage one housing cost is of another and this is shown in the tables below. Focusing on 2-bedroom homes the analysis shows that social rents are significantly cheaper than market rents (and indeed affordable rents) and that affordable rents (as currently charged) represent 54% of a current lower quartile rent.

Table 7.17 Difference between rent levels for different products – Tonbridge & Malling

	Social rent as % of affordable rent	Social rent as % of LQ market rent	Affordable rent as % of LQ market rent	LHA as % of LQ market rent
1-bedroom	81%	49%	61%	71-84%
2-bedrooms	71%	39%	54%	61-77%
3-bedrooms	72%	38%	53%	58-81%
4-bedrooms	58%	29%	51%	55-77%
ALL	76%	40%	53%	

Source: RSH and VOA

7.74 The table below suggests that around 14% of households who cannot afford to rent privately could afford an affordable rent at 80% of current market rents (as estimated earlier in this section), with a further 29% being able to afford current affordable rents (which are typically lower). There are also an estimated 16% who can afford a social rent (but not an affordable one). A total of 41% of households would need some degree of benefit support (or spend more than 35% of income on housing) to be able to afford their housing (regardless of the tenure). This analysis points to a clear need for social rented housing.

Table 7.18 Estimated need for affordable rented housing (% of households able to afford to buy OR rent)

	% of households able to afford
Afford 80% of market rent	14%
Afford current affordable rent	29%
Afford social rent	16%
Need benefit support	41%
All unable to afford market	100%

Source: Affordability analysis

7.75 The analysis indicates that provision of at least 60% of rented affordable housing at social rents could be justified; albeit in setting planning policies, this will need to be considered alongside viability evidence. Higher provision at social rents will reduce the support through housing benefits required to ensure households can afford their housing costs.

Intermediate Housing

7.76 As well as rented forms of affordable housing, the Council could seek to provide forms of intermediate housing with the analysis below considering the potential affordability of shared ownership and discounted market sale housing (which could include First Homes).

7.77 Generally, intermediate housing will be a newbuild product, sold at a discount (or on a part buy, part rent arrangement with shared ownership) and will therefore be based on the Open Market Value (OMV) of a new home.

7.78 The table below sets out a suggested purchase price for affordable home ownership/First Homes in Tonbridge & Malling by size. It works through first (on the left hand side) what households with an affordable home ownership need could afford (based on a 10% deposit and a mortgage at 4.5 times' income (as in Table 7.4)). The right-hand side of the table then sets out what Open Market Value (OMV) this might support, based on a 30% discount. The lower end of the range is based on households who could afford to rent privately without financial support at LQ rents; with the upper end based on the midpoint between this and the lower quartile house price.

7.79 Focussing on 2-bedroom homes, it is suggested that an affordable price is between £240,000 and £247,500 and therefore the open market value of homes would need to be in the range of £342,900 and £353,600 (if discounted by 30%).

Table 7.19 Affordable home ownership prices – Tonbridge & Malling

	What households with an affordable home ownership need could afford	Open Market Value (OMV) of Home with 30% Discount
1-bedroom	£162,900-£166,400	£232,700-£237,800
2-bedrooms	£240,000-£247,500	£342,900-£353,600
3-bedrooms	£278,600-£319,300	£398,000-£456,100
4+-bedrooms	£402,900-£438,900	£575,500-£627,000

Source: Iceni analysis

7.80 It is difficult to definitively analyse the cost of newbuild homes as these will vary from site-to-site and will be dependent on a range of factors such as location, built-form and plot size. We have however looked at newbuild schemes currently advertised on Rightmove with the table below providing a general summary of existing schemes.

7.81 This analysis is interesting as it shows the median newbuild price for all sizes of homes is roughly at or above the top end of the OMV required to make homes affordable to those in the gap between buying and renting. That said, homes at the bottom end of the price range could potentially be discounted by 30% and considered as affordable.

7.82 This analysis shows how important it will be to know the OMV of housing before discount to be able to determine if a product is going to be genuinely affordable in a local context – providing a discount of 30% will not automatically mean it becomes affordable housing. Overall, it is considered the evidence does not support a need for First Homes (or other discounted market products) in a local context.

Table 7.20 Estimated newbuild housing cost by size – Tonbridge & Malling

	No. of homes advertised	Range of prices	Median price
1-bedroom[15]	11	£200,000-£380,000	£225,000
2-bedrooms	47	£275,000-£710,000	£350,000
3-bedrooms	50	£350,000-£1,000,000	£485,000
4+-bedrooms	76	£525,000-£1,400,000	£650,000

Source: Iceni analysis

7.83 With regard to First Homes specifically, the analysis does also suggest it will be difficult to provide housing other than 1- or possibly 2-bedroom homes given a price cap of £250,000 and therefore a reasonable mix of housing in this tenure would not be possible.

7.84 The analysis below moves on to consider shared ownership, for this analysis an assessment of monthly outgoings has been undertaken with a core assumption being that the outgoings should be the same as for renting privately so as to make this tenure genuinely affordable.

7.85 The analysis has looked at what the OMV would need to be for a shared ownership to be affordable with a 10%, 25% and 50% share. To work out outgoings, the mortgage part is based on a 10% deposit (for the equity share) and a repayment mortgage over 25 years at 5% with a rent at 2.75% per annum on unsold equity.

7.86 The findings for this analysis are interesting and do point to the possibility of shared ownership being a more affordable tenure than discounted market housing (including First Homes).

[15] The majority of the 1-bedroom homes were on a single scheme in Tonbridge which will impact on general price estimates for this size of accommodation

7.87 By way of an explanation of this table (focussing on 2-bedroom homes) – if a 50% equity share scheme came forward then it is estimated the OMV could not be above £371,000 if it is to be genuinely affordable (due to the outgoings being in excess of the cost of privately renting).

7.88 However, given the subsidised rents, the same level of outgoings could be expected with a 10% equity share but a much higher OMV of £541,000.

7.89 Although affordability can only be considered on a scheme by scheme basis, it is notable that we estimate a median 2-bedroom newbuild to cost around £350,000 (as in Table 7.19) – this points to shared ownership at all equity share levels as being genuinely affordable, although lower shares could increase the number of households able to afford.

Table 7.21 Estimated OMV of Shared Ownership with a 50%, 25% and 10% Equity Share by Size – Tonbridge & Malling

	50% share	25% share	10% share
1-bedroom	£252,000	£313,000	£367,000
2-bedroom	£371,000	£461,000	£541,000
3-bedroom	£430,000	£536,000	£628,000
4-bedrooms	£622,000	£774,000	£908,000

Source: Iceni analysis

7.90 The table below shows the estimated minimum income likely to be required afford different sizes of homes – this is based on the outgoings being equivalent to privately renting and a household spending no more than 35% of income on housing. For 4-bedroom homes the income is over £80,000 and therefore above the threshold for shared ownership in the Borough.

7.91 This would suggest it may be difficult to provide shared ownership of this size and make it genuinely affordable although this would need to be determined on a scheme by scheme basis.

Table 7.22 Estimated minimum households income likely to be required to afford shared ownership – Tonbridge & Malling

	Minimum income
1-bedroom	£32,600
2-bedroom	£48,000
3-bedroom	£55,700
4-bedrooms	£80,600

Source: Iceni analysis

7.92 A further affordable option is Rent to Buy; this is a Government scheme designed to ease the transition from renting to buying the same home. Initially (typically for five years), the newly built home will be provided at the equivalent of an affordable rent (approximately 20% below the market rate).

7.93 The expectation is that the discount provided in the first five years is saved in order to put towards a deposit on the purchase of the same property. Rent to Buy can be advantageous for some households as it allows for a smaller 'step' to be taken on the home ownership ladder.

7.94 At the end of the five years, depending on the scheme, the property is either sold as a shared ownership product or purchased outright as a full market property. If the occupant is not able to do either of these, then the property is vacated.

7.95 To access this tenure, it effectively requires the same income threshold for the initial phase as a market rental property, although the cost of accommodation will be that of affordable rent.

7.96 The lower-than-market rent will allow the household to save for a deposit for the eventual shared ownership or market property. In considering the affordability of rent-to-buy schemes, there is a direct read across to the income required to access affordable home ownership (including shared ownership). It should therefore be treated as part of the affordable home ownership products suggested by the NPPF.

Affordable Housing – Summary

7.97 The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income.

7.98 The evidence indicates that there is an acute need for affordable housing in the Borough and a need in all sub-areas.

7.99 The majority of need is from households who are unable to buy OR rent and therefore points particularly towards a need for rented affordable housing rather than affordable home ownership.

7.100 Despite the level of need being high, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs.

7.101 That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.

7.102 The analysis suggests there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and possibly also for some households who claim full Housing Benefit.

7.103 It is, however, clear that social rents are more affordable and could benefit a wider range of households – social rents could therefore be prioritised where delivery does not prejudice the overall delivery of affordable homes.

7.104 Shared ownership is likely to be suitable AHO products for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent.

7.105 There was no strong evidence of a need for First Homes or discounted market housing more generally.

7.106 In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Council will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).

7.107 The evidence would justify a policy position of 80% low cost rented and 20% affordable home ownership homes. The evidence indicates that up to 60% of rented affordable housing at social rents could be justified in need terms (therefore about 50% of all affordable housing). Low cost home ownership provision should focus on shared ownership, with no strong evidence of a need for First Homes or discounted market housing identified.

7.108 Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area.

7.109 It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided.

7.110 The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

8. Need for Different Sizes of Homes

Introduction

8.1 This section considers the appropriate mix of housing across Tonbridge & Malling, with a particular focus on the sizes of homes required in different tenure groups.

8.2 It also looks at a range of statistics in relation to families (generally described as households with dependent children) before moving on to look at how the number of households in different age groups are projected to change moving forward.

Background Data

8.3 The number of families in Tonbridge & Malling (defined for the purpose of this assessment as any household which contains at least one dependent child) totalled 17,100 as of the 2021 Census, accounting for 32% of households; this proportion is higher than seen across other areas, with the proportion of married couples with children being particularly high.

Table 8.1 Households with Dependent Children (2021)

	Tonbridge & Malling		Kent	South East	England
	No.	%	%	%	%
Married couple	9,897	18.5%	15.1%	16.3%	14.4%
Cohabiting couple	2,771	5.2%	5.1%	4.4%	4.5%
Lone parent	3,356	6.3%	6.6%	6.0%	6.9%
Other households	1,054	2.0%	2.6%	2.5%	2.7%
All other households	36,495	68.1%	70.6%	70.9%	71.5%
Total	53,573	100%	100.%	100.0%	100.0%
Total with dependent children	17,078	31.9%	29.4%	29.1%	28.5%

Source: Census (2021)

8.4 The table below shows the same information for each of the sub-areas. There are some notable variations in the proportion of households with dependent children, this being highest in Malling & Kings Hill (38% of households) and lowest in the Rural area (29% of households). All areas see a proportion of households with dependent children at or above the regional and national average.

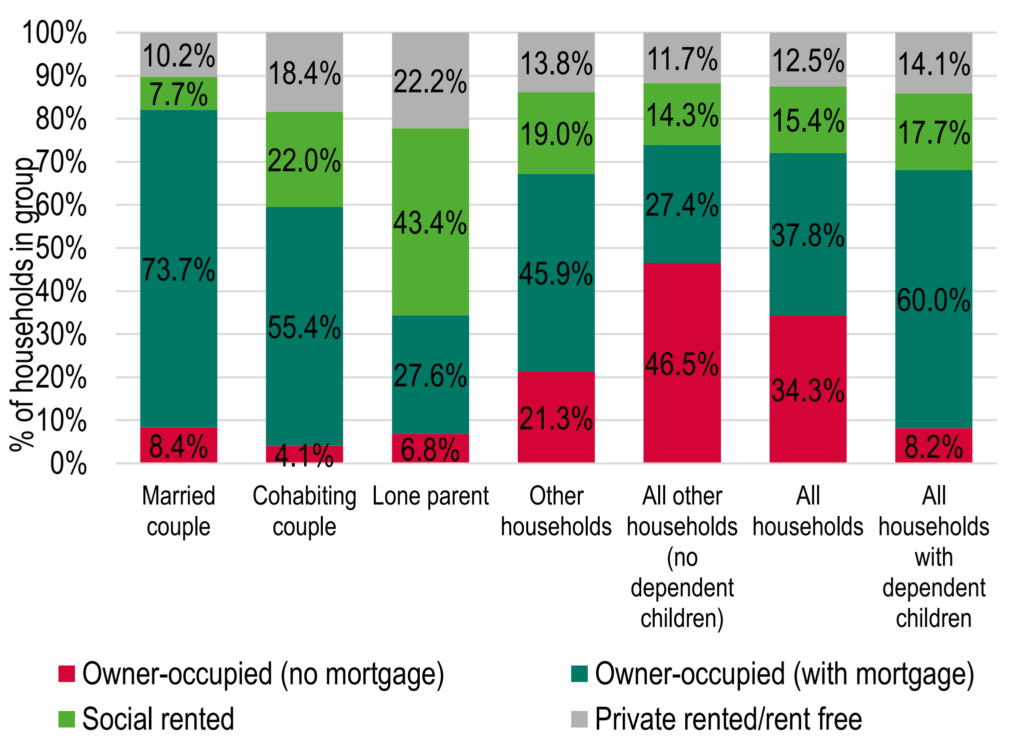
Table 8.2 Households with dependent children (2021) – sub-areas

	Aylesford & Larkfield	Malling & Kings Hill	Medway Facing	Rural	Tonbridge	TMBC
Married couple	16.5%	22.7%	16.6%	18.1%	19.0%	18.4%
Cohabiting couple	6.6%	5.4%	5.7%	4.3%	4.2%	5.2%
Lone parent	7.0%	7.5%	6.4%	4.7%	5.9%	6.2%
Other households	1.9%	2.2%	2.0%	2.0%	1.8%	2.0%
All other households	68.0%	62.2%	69.2%	70.9%	69.1%	68.2%
Total	100%	100%	100%	100%	100%	100%
Total with dependent children	32.0%	37.8%	30.8%	29.1%	30.9%	31.8%

Source: Census (2021)

8.5 The figure below shows the current tenure of households with dependent children. There are some considerable differences by household type with lone parents having a very high proportion living in the social rented sector and also in private rented accommodation. Across the Borough, only 34% of lone-parent households are owner-occupiers compared with 82% of married couples with children.

Figure 8.1 Tenure of households with dependent children (2021) – Tonbridge & Malling

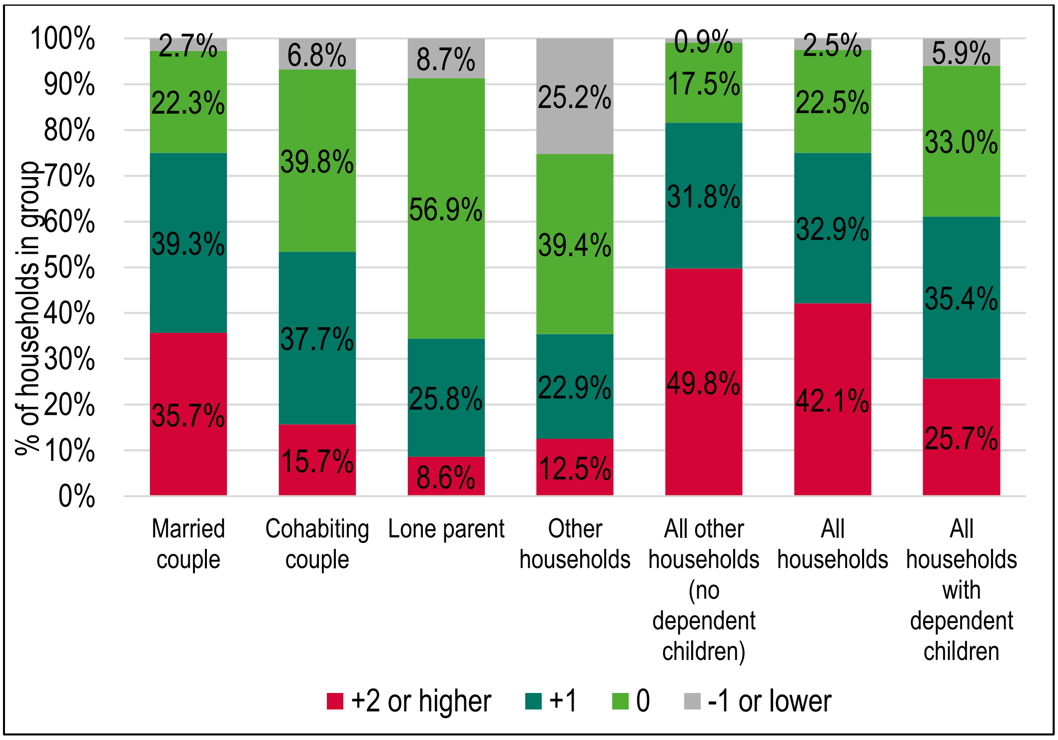


Source: Census (2021)

8.6 The figure below shows levels of overcrowding and under-occupancy of households with dependent children. This shows higher levels of overcrowding (minus figure) for all household types with dependent children with 9% of all lone parents and 25% of 'other' households being overcrowded.

8.7 Overall, some 6% of households with dependent children are overcrowded, compared with less than 1% of other households. Levels of under-occupancy (positive figures) are also notably lower in households with dependent children.

Figure 8.2 Occupancy rating of households with dependent children (2021) – Tonbridge & Malling



Source: Census (2021)

The Mix of Housing

8.8 A model has been developed that starts with the current profile of housing in terms of size (bedrooms) and tenure. Within the data, information is available about the age of households and the typical sizes of homes they occupy. By using demographic projections, it is possible to see which age groups are expected to change in number, and by how much.

8.9 On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to assess the profile of housing needed over the assessment period (taken to be 2024-42 to be consistent with other analysis in this report).

8.10 An important starting point is to understand the current balance of housing in the area – the table below profiles the sizes of homes in different tenure groups across areas.

8.11 The data shows a market stock (owner-occupied) that is dominated by 3+-bedroom homes (making up 78% of the total in this tenure group, a slightly higher proportion to that seen in other areas).

8.12 The profile of the social rented sector is broadly similar across areas although the Borough does have a higher proportion of 3-bedroom homes. The private rented sector is also similar to other locations but with slightly fewer 1-bedroom homes. Observations about the current mix feed into conclusions about future mix later in this section.

Table 8.3 Number of Bedrooms by Tenure, 2021

		Tonbridge & Malling	South East	England
Owner-occupied	1-bedroom	3%	4%	4%
	2-bedrooms	20%	21%	21%
	3-bedrooms	42%	42%	46%
	4+-bedrooms	36%	33%	29%
	Total	100%	100%	100%
	Ave. no. beds	3.11	3.04	3.01
Social rented	1-bedroom	26%	31%	29%
	2-bedrooms	31%	35%	36%
	3-bedrooms	40%	31%	31%
	4+-bedrooms	3%	4%	4%
	Total	100%	100%	100%
	Ave. no. beds	2.21	2.08	2.10
Private rented	1-bedroom	17%	24%	21%
	2-bedrooms	42%	38%	39%
	3-bedrooms	29%	27%	29%
	4+-bedrooms	12%	12%	11%
	Total	100%	100%	100%
	Ave. no. beds	2.36	2.27	2.30

Source: Census (2021)

Overview of Methodology

8.13 The method to consider future housing mix looks at the ages of the Household Reference Persons and how these are projected to change over time. The sub-sections to follow describe some of the key analyses.

Understanding How Households Occupy Homes

8.14 Whilst the demographic projections provide a good indication of how the population and household structure will develop; it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided.

8.15 The main reason for this is that in the market sector, households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.

8.16 The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a 4-bedroom home as long as they can afford it, and hence projecting an increase in single-person households does not automatically translate into a need for smaller units.

8.17 That said, issues of supply can also impact occupancy patterns, for example, it may be that a supply of additional smaller-level access homes would encourage older people to downsize but in the absence of such accommodation, these households remain living in their larger accommodation.

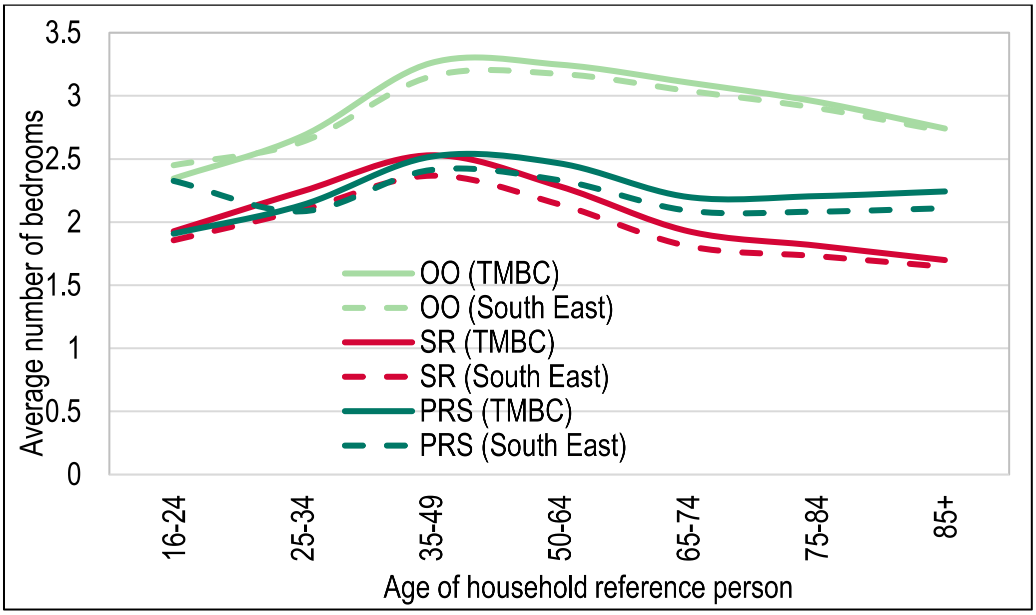
8.18 The issue of choice is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) where households are allocated properties which reflect the size of the household, although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing (e.g. those who can afford to pay the spare room subsidy ('bedroom tax')).

8.19 The approach used, is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups (data being drawn from the 2021 Census).

8.20 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group for Tonbridge & Malling and the South East region.

8.21 In all sectors, the average size of accommodation rises over time to typically reach a peak around the age of 50. After peaking, the average dwelling size decreases – as typically some households downsize as they get older. The analysis confirms Tonbridge & Malling as having broadly similar dwelling sizes in all tenures and age groups.

Figure 8.3 Average Bedrooms by Age and Tenure in Tonbridge & Malling and the region



Source: Census (2021)

8.22 The analysis uses the existing occupancy patterns at a local level as a starting point for analysis and applies these to the projected changes in Household Reference Person by age discussed below. The analysis has been used to derive outputs for three broad categories. These are:

- **Market Housing** – which is taken to follow the occupancy profiles in the market sector (i.e. owner-occupiers and the private rented sector);

- **Affordable Home Ownership** – which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government's desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting); and

- **Affordable Rented Housing** – which is taken to follow the occupancy profile in the social rented sector, including affordable rent and social rent.

Changes to Households by Age

8.23 The table below presents the projected change in households by age of household reference person under the Standard Method (at the time 1,090 dpa).

8.24 This shows growth as being expected in all age groups and in particular older age groups (notably 85+), although some high growth is also projected in younger age groups, in part due to an assumption that household formation could improve over time.

Table 8.4 Projected Change in Household by Age of HRP in Tonbridge & Malling

	2024	2042	Change in Households	% Change
Under 25	628	1,442	814	129.6%
25-34	6,385	9,022	2,637	41.3%
35-49	14,622	20,101	5,478	37.5%
50-64	16,669	19,908	3,239	19.4%
65-74	7,324	9,856	2,532	34.6%
75-84	6,820	9,193	2,372	34.8%
85+	2,938	4,740	1,802	61.3%
TOTAL	55,386	74,260	18,874	34.1%

Source: Iceni Analysis

Modelled Outputs

8.25 By following the methodology set out above and drawing on the sources shown, a series of outputs have been derived to consider the likely size requirement of housing within each of the three broad tenures at a local authority level.

8.26 The analysis is based on considering both local and regional occupancy patterns. The data linking to local occupancy will to some extent reflect the role and function of the local area, whilst the regional data will help to establish any particular gaps (or relative surpluses) of different sizes/tenures of homes when considered in a wider context.

8.27 The analysis for rented affordable housing can also draw on data from the local authority Housing Register with regards to the profile of need. The data shows a pattern of need which is focussed on 1-bedroom homes but with over a third of households requiring 3+-bedroom accommodation.

Table 8.5 Size of Social/Affordable Rented Housing Needed – Housing Register Information (2024)

	Number of households	% of households
1-bedroom	58	35%
2-bedrooms	46	28%
3-bedrooms	46	28%
4+-bedrooms	14	9%
TOTAL	164	100%

Source: LAHS

8.28 The table below shows the modelled outputs of need by dwelling size in the three broad tenures. Market housing focusses on 3+-bedroom homes, affordable home ownership on 2- and 3-bedroom accommodation and rented affordable housing showing a slightly smaller profile again.

Table 8.6 Initial Modelled Mix of Housing by Size and Tenure – Tonbridge & Malling

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	8%	26%	39%	28%
Affordable home ownership	22%	40%	26%	12%
Affordable rented housing	29%	33%	34%	4%

Source: Housing Market Model

Rightsizing

8.29 The analysis above sets out the potential need for housing if occupancy patterns remain the same as they were in 2021 (with differences from the current stock profile being driven by demographic change). It is however worth also considering that the 2021 profile will have included households who are overcrowded (and therefore need a larger home than they actually live in) and also those who under-occupy (have more bedrooms than they need).

8.30 There is a case to seek for new stock to more closely match actual size requirements. Whilst it would not be reasonable to expect to remove all under-occupancy (particularly in the market sector) it is the case that in seeking to make the most efficient use of land it would be prudent to look to reduce this over time. Further analysis has been undertaken to take account of overcrowding and under-occupancy (by tenure).

8.31 The table below shows a cross-tabulation of a household's occupancy rating and the number of bedrooms in their home (for owner-occupiers). This shows a high number of households with at least 2 spare bedrooms who are living in homes with 3 or more bedrooms. There are also a small number of overcrowded households.

8.32 In the owner-occupied sector in 2021, there were 35,600 households with some degree of under-occupation and around 400 overcrowded households – some 87% of all owner-occupiers have some degree of under-occupancy.

Table 8.7 Cross-tabulation of occupancy rating and number of bedrooms (owner-occupied sector) – Tonbridge & Malling

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2 spare bedrooms	0	0	9,103	11,417	20,520
+1 spare bedrooms	0	5,817	5,104	2,118	13,039
0 “Right sized”	1,039	1,570	1,775	271	4,655
-1 too few bedrooms	39	168	148	43	398
TOTAL	1,078	7,555	16,130	13,849	38,612

Source: Census (2021)

8.33 For completeness the tables below show the same information for the social and private rented sectors. In both cases there are more under-occupying households than overcrowded, but differences are less marked than seen for owner-occupied housing.

Table 8.8 Cross-tabulation of occupancy rating and number of bedrooms (social rented sector) – Tonbridge & Malling

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2 spare bedrooms	0	0	808	87	895
+1 spare bedrooms	0	939	954	120	2,013
0 “Right sized”	2,053	1,301	1,263	59	4,676
-1 too few bedrooms	99	284	268	17	668
TOTAL	2,152	2,524	3,293	283	8,252

Source: Census (2021)

Table 8.9 Cross-tabulation of occupancy rating and number of bedrooms (private rented sector) – Tonbridge & Malling

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2 spare bedrooms	0	0	595	545	1,140
+1 spare bedrooms	0	1,597	787	200	2,584
0 “Right sized”	1,079	1,057	507	60	2,703
-1 too few bedrooms	73	136	53	15	277
TOTAL	1,152	2,790	1,942	820	6,704

Source: Census (2021)

8.34 In using this data in the modelling, an adjustment is made to move some of those who would have been picked up in the modelling as under-occupying into smaller accommodation. Where there is under-occupation by 2 or more bedrooms, the adjustment takes 25% of this group and assigns to a '+1' occupancy.

8.35 This does need to be recognised as an assumption but can be seen to be reasonable, as they do retain some (considerable) degree of under-occupation (which is likely) but does also seek to model a better match between household needs and the size of their home.

8.36 For overcrowded households a move in the other direction is made, in this case households are moved up as many bedrooms as is needed to resolve the problems (this is applied for all overcrowded households).

8.37 The adjustments for under-occupation and overcrowding lead to the suggested mix as set out in the following tables. It can be seen that this tends to suggest a smaller profile of homes as being needed (compared to the initial modelling) with the biggest change being in the market sector – which was the sector where under-occupation is currently most notable.

Table 8.10 Modelled Mix of Housing by Size and Tenure – Tonbridge & Malling

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	7%	31%	40%	22%
Affordable home ownership	20%	42%	27%	11%
Affordable housing (rented)	27%	34%	32%	7%

Source: Iceni Housing Market Model

8.38 Across the Borough, the analysis points to around a quarter of the social/affordable housing need being for 1-bedroom homes and it is of interest to see how much of this is due to older person households. In the future household sizes are projected to drop whilst the population of older people will increase. Older person households (as shown earlier) are more likely to occupy smaller dwellings. The impacts of older people have on demand for smaller stock is outlined in the table below.

8.39 This indeed identifies a larger profile of homes needed for households where the household reference person is aged Under 65, with a concentration of 1-bedroom homes for older people.

8.40 This information can be used to inform the mix required for General Needs rather than Specialist Housing, although it does need to be noted that not all older people would be expected to live in homes with some form of care or support.

8.41 The 2, 3, and 4+-bedroom categories have been merged for the purposes of older persons as we would not generally expect many (if any) households in this category to need (or indeed be able to be allocated) more than 2-bedrooms in the rented affordable housing sector.

Table 8.11 Modelled Mix of Housing by Size and Age – affordable housing (rented) – Tonbridge & Malling

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Under 65- (General Needs)	18%	37%	36%	8%
65 and over (Age Restricted and Specialist)	48%	52%		
All affordable housing (rented)	27%	34%	32%	7%

Source: Housing Market Model

8.42 A further analysis of the need for rented affordable housing is to compare the need with the supply (turnover) of different sizes of accommodation. This links back to estimates of need in the previous section (an annual need for 532 dwellings per annum from households unable to buy OR rent) with additional data from CoRe about the sizes of homes let over the past three years – due to data availability this analysis is for the study area as a whole.

8.43 This analysis is quite clear in showing the very low supply of larger homes relative to the need for 4+-bedroom accommodation in particular, where it is estimated the supply is only around 6% of the need arising each year, whereas for 1-bedroom homes around a third of the need can be met.

Table 8.12 Need for rented affordable housing by number of bedrooms

	Gross Annual Need	Gross Annual Supply	Net Annual Need	As a % of total net annual need	Supply as a % of gross need
1-bedroom	213	67	145	27.3%	31.7%
2-bedrooms	246	67	179	33.5%	27.3%
3-bedrooms	211	39	172	32.3%	18.5%
4+-bedrooms	39	2	36	6.8%	5.6%
Total	708	176	532	100.0%	24.8%

Source: Iceni analysis

Indicative Targets for Different Sizes of Property by Tenure

8.44 The analysis below provides some indicative targets for different sizes of home (by tenure). The conclusions take account of a range of factors, including the modelled outputs and an understanding of the stock profile and levels of under-occupancy and overcrowding.

8.45 The analysis (for rented affordable housing) also draws on the Housing Register data as well as taking a broader view of issues such as the flexibility of homes to accommodate changes to households (e.g. the lack of flexibility offered by a 1-bedroom home for a couple looking to start a family).

Social/Affordable Rented

8.46 Bringing together the above, a number of factors are recognised. This includes recognising that it is unlikely that all affordable housing needs will be met and that it is likely that households with a need for larger homes will have greater priority (as they are more likely to contain children).

8.47 That said, there is also a possible need for 1-bedroom social housing arising due to homelessness (typically homeless households are more likely to be younger single people). The following mix of social/affordable rented housing is therefore suggested:

Table 8.13 Recommended Social/ Affordable Rented Housing Mix

1-bedroom	25%
2-bedrooms	35%
3-bedrooms	30%
4+ bedrooms	10%

Source: Iceni Analysis

8.48 If a development is to include housing specifically for older people (e.g. forms of age-restricted housing) then broadly a 50:50 split between 1- and 2-bedroom homes is recommended. The inclusion of some 2-bedroom homes is considered sensible with the aim to promote the opportunity for older person households to downsize – a 2-bed offering being more likely to encourage this than 1-bed homes. Also, whilst technically most older person households will only have a ‘need’ for a 1-bed home, a larger property remains affordable as most older person households are not impacted by the bedroom tax/spare room subsidy.

8.49 While we have identified a need for 50% of affordable older person homes to be 2+ bedrooms it is likely that delivery will be focused on those with only 2-bedrooms.

8.50 It should be noted that the above recommendations are to a considerable degree based on projecting the need forward to 2042 and will vary over time.

8.51 It may be at a point in time the case that Housing Register data identifies a shortage of housing of a particular size/type which could lead to the mix of housing being altered from the overall suggested requirement.

Affordable Home Ownership

8.52 In the affordable home ownership sector, a profile of housing that more closely matches the outputs of the modelling is suggested. It is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households and childless couples.

8.53 The conclusions also take account of the earlier observation that it may be difficult to make larger homes genuinely affordable for AHO. Based on this analysis, it is suggested that the following mix of affordable home ownership would be appropriate:

Table 8.14 Recommended Affordable Home Ownership Housing Mix

1-bedroom	20%
2-bedrooms	45%
3-bedrooms	25%
4+ bedrooms	10%

Source: Iceni Analysis

Market Housing

8.54 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile (as well as observations about the current mix when compared with other locations and also the potential to slightly reduce levels of under-occupancy).

8.55 We have also had regard to the potential for rightsizing but also recognise that in the market sector there is limited ability to control what households purchase. This sees a slightly larger recommended profile compared with other tenure groups.

Table 8.15 Recommended Market Housing Mix

1-bed	10%
2-bed	30%
3-bed	40%
4+ bed	20%

Source: Iceni Analysis

8.56 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market (including the stock profile in different tenures as set out earlier in this section), it does not necessarily follow that such prescriptive figures should be included in the plan making process (although it will be useful to include an indication of the broad mix to be sought across the Council area) – demand can change over time linked to macro-economic factors and local supply. Policy aspirations could also influence the mix sought.

8.57 The suggested figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area.

8.58 The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and the Council could expect justification for a housing mix on such sites which significantly differs from that modelled herein.

8.59 Site location and area character are also relevant considerations as to what the appropriate mix of market housing on individual development sites.

Smaller-area Housing Mix

8.60 The analysis above has focussed on overall study Borough-wide needs with conclusions at the strategic level. It should however be recognised that there will be variations in the need within the area due to the different role and function of a location and the specific characteristics of local households (which can also vary over time).

8.61 This report does not seek to model smaller-area housing mix although data is available that can help inform specific local issues (including data about household composition, current housing mix and overcrowding/under-occupation). Below are some points for consideration when looking at needs in any specific location:

a) Whilst there are differences in the stock profile in different locations this should not necessarily be seen as indicating particular surpluses or shortfalls of particular types and sizes of homes;
b) As well as looking at the stock, an understanding of the role and function of areas is important. For example, areas traditionally favoured by family households might be expected to provide a greater proportion of larger homes;

c) That said, some of these areas will have very few small/cheaper stocks and so consideration needs to be given to diversifying the stock; and

d) The location/quality of sites will also have an impact on the mix of housing. For example, brownfield sites in urban locations may be more suited to flatted development (as well as recognising the point above about role and function) whereas a more suburban/rural site may be more appropriate for family housing. Other considerations (such as proximity to public transport) may impact on a reasonable mix at a local level.

8.62 Overall, it is suggested the Council should broadly seek the same mix of housing in all locations as a starting point in policy; but would be flexible to a different mix where specific local characteristics suggest (such as site characteristics and location).

8.63 Additionally, in the affordable sector it may be the case that Housing Register data for a smaller area identifies a shortage of housing of a particular size/type which could lead to the mix of housing being altered from the overall suggested requirement.

Housing Mix – Summary

8.64 Analysis of the future mix of housing required takes account of demographic change, including potential changes to the number of family households and the ageing of the population.

8.65 The proportion of households with dependent children in Tonbridge & Malling is above average with around 32% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally).

8.66 There are notable differences between different types of households, with married couples (with dependent children) seeing a high level of owner-occupation, whereas as lone parents are particularly likely to live in social or private rented accommodation.

8.67 There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability.

8.68 The analysis linked to future demographic change concludes that the following table represents an appropriate mix of affordable and market homes.

Table 8.16 Suggested size mix of housing by tenure – Tonbridge & Malling

	Market	Affordable home ownership	Affordable housing (rented)
1-bedroom	10%	20%	25%
2-bedrooms	30%	45%	35%
3-bedrooms	40%	25%	30%
4+-bedrooms	20%	10%	10%

Source: Iceni Projects

8.69 These recommendations take account of both household changes and the ageing of the population as well as seeking to make more efficient use of new stock by not projecting forward the high levels of under-occupancy (which is notable in the market sector).

8.70 In all sectors the analysis points to a particular need for 2- and 3-bedroom accommodation, with varying proportions of 1- and 4+-bedroom homes.

8.71 For rented affordable housing there is a clear need for a range of different sizes of homes, including 40% to have at least 3-bedrooms of which 10% should have at least 4-bedrooms.

8.72 The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households.

8.73 Also recognised is the limited flexibility which 1-bedroom properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure and also the size requirements shown on the Housing Register.

8.74 The mix identified above could inform strategic policies although a flexible approach should be adopted. For example, in some areas affordable PRPs find difficulties selling 1-bedroom affordable home ownership (AHO) homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation.

8.75 That said, given current house prices there are potential difficulties in making (larger) AHO genuinely affordable.

8.76 Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.

8.77 The Council should also monitor the mix of housing delivered.

9. Older Persons Housing Need

Introduction

9.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability.

9.2 This section responds to Planning Practice Guidance on Housing for Older and Disabled People published by Government in June 2019. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

Older People

9.3 The table below provides baseline population data about older persons in Tonbridge & Malling and compares this with other areas. The table shows the Borough has a slightly older age structure to that seen regionally or nationally with 19% of the population being aged 65 and over.

9.4 The proportion of people aged 75 and over and 85 and over is slightly higher but broadly in-line with equivalent figures for other areas.

Table 9.1 Older Persons Population, 2023

	Tonbridge & Malling	Kent	South East	England
Under 65	80.7%	79.5%	80.2%	81.3%
65-74	9.4%	10.1%	9.7%	9.5%
75-84	7.3%	7.6%	7.2%	6.7%
85+	2.6%	2.8%	2.8%	2.5%
Total	100.0%	100.0%	100.0%	100.0%
Total 65+	19.3%	20.5%	19.8%	18.7%
Total 75+	9.9%	10.4%	10.1%	9.2%

Source: ONS

9.5 The table below shows the same data for sub-areas. This is based on the 2022 mid-year population estimates (MYE) and so is slightly different to the 2023 MYE as shown above.

9.6 The analysis points to some variation in the proportion of older people, this being notably higher in the Rural area – Malling & Kings Hill has the lowest proportion of people aged 65+.

Table 9.2 Older Persons Population, 2022 – sub-areas

	Aylesford & Larkfield	Malling & Kings Hill	Medway Facing	Rural	Ton-bridge	TMBC
Under 65	81.9%	83.0%	82.0%	76.6%	80.6%	80.7%
65-74	9.3%	8.9%	9.5%	11.7%	9.0%	9.6%
75-84	6.7%	6.4%	6.7%	8.4%	7.2%	7.1%
85+	2.2%	1.7%	1.8%	3.3%	3.3%	2.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Total 65+	18.1%	17.0%	18.0%	23.4%	19.4%	19.3%
Total 75+	8.8%	8.1%	8.5%	11.7%	10.5%	9.7%

Source: ONS

Projected Future Change in the Population of Older People

9.7 Population projections can next be used to provide an indication of how the number of older persons might change in the future with the table below showing that Tonbridge & Malling is projected to see a notable increase in the older person population – the projection is based on the Standard Method (at the time 1,090 dpa).

9.8 For the 2024-42 a projected increase in the population aged 65+ of around 38% is shown – the population aged under 65 is in contrast projected to see a slightly more modest increase (of 30%).

9.9 In total population terms, the projections show an increase in the population aged 65 and over of 10,100 people. This is against a backdrop of an overall increase of 42,600 – population growth of people aged 65 and over therefore accounts for 24% of the total projected population change.

Table 9.3 Projected Change in Population of Older Persons, 2024 to 2042 – Tonbridge & Malling

	2024	2042	Change in population	% change
Under 65	109,719	142,172	32,453	29.6%
65-74	12,784	17,195	4,411	34.5%
75-84	9,994	13,452	3,458	34.6%
85+	3,685	5,962	2,277	61.8%
Total	136,182	178,781	42,599	31.3%
Total 65+	26,463	36,609	10,146	38.3%
Total 75+	13,679	19,414	5,735	41.9%

Source: Iceni Analysis

Characteristics of Older Person Households

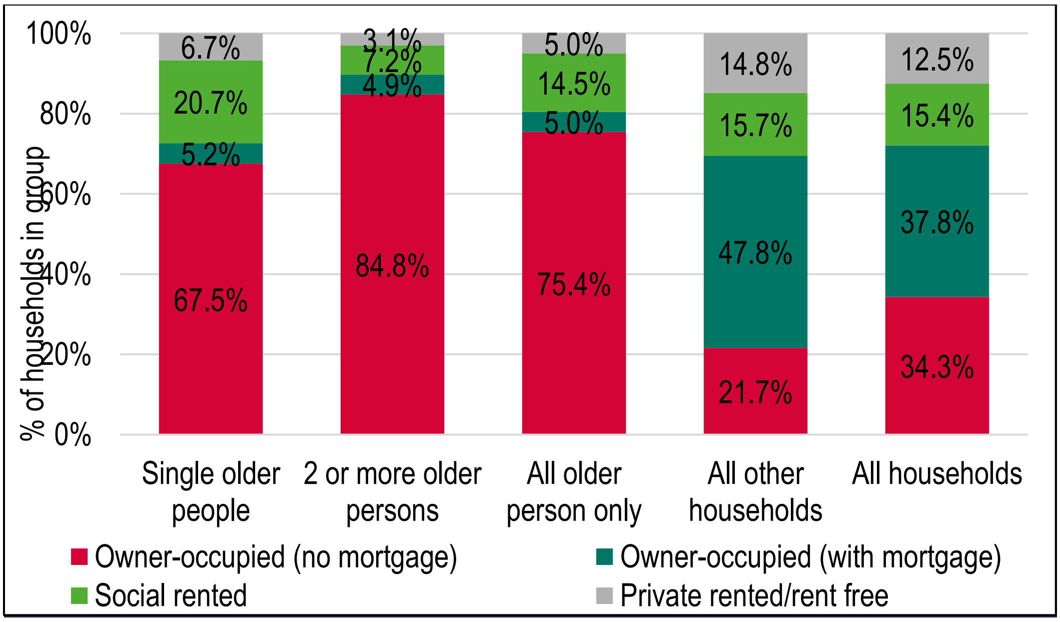
9.10 The figure below shows the tenure of older person households. The data has been split between single older person households and those with two or more older people (which will largely be couples).

9.11 The data shows that the majority of older persons households are owner occupiers (80% of older person households), and indeed most are owner occupiers with no mortgage and thus may have significant equity which can be put towards the purchase of a new home.

9.12 Some 15% of older persons households live in the social rented sector and the proportion of older person households living in the private rented sector is relatively low (about 5%).

9.13 There are also notable differences for different types of older person households with single older people having a lower level of owner-occupation than larger older person households – this group also has a higher proportion living in the social rented sector.

Figure 4.1: Tenure of Older Persons Households in Tonbridge & Malling, 2021



Source: 2021 Census

9.14 The table below shows the tenure of older person households by sub-area (figures are for all older person households). This shows modest differences between areas with a range from 78% of older persons being owner-occupiers in Aylesford & Larkfield, up to 87% in the Medway Facing sub-area.

9.15 Figures for the proportions living in social rented housing show the opposite pattern, varying from 8% in the Medway Facing area, up to 18% in Aylesford & Larkfield. There is little variance in the proportions living in the private rented sector – between 4% and 6% in all areas.

Table 9.4 Tenure of Older Persons Households in Tonbridge & Malling, 2021 – sub-areas

	Owner-occupied (no mortgage)	Owner-occupied (with mortgage)	Social rented	Private rented	TOTAL
Aylesford & Larkfield	72.9%	4.6%	17.9%	4.5%	100.0%
Malling & Kings Hill	73.5%	5.2%	15.2%	6.1%	100.0%
Medway Facing	80.4%	7.0%	8.2%	4.3%	100.0%
Rural	78.1%	6.0%	9.7%	6.2%	100.0%
Tonbridge	74.7%	4.6%	16.1%	4.6%	100.0%
TMBC	75.2%	5.2%	14.5%	5.1%	100.0%

Source: 2021 Census

Disabilities

9.16 The table below shows the proportion of people who are considered as disabled under the definition within the 2010 Equality Act[16], drawn from 2021 Census data, and the proportion of households where at least one person has a disability.

9.17 The data suggests that some 29% of households in the Council area contain someone with a disability. This figure is slightly lower than seen across other areas. The figures for the population with a disability also

[16] The Census uses the same definition of disability as described in the Equality Act. This defines disability as a person with a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities.

show a slightly lower proportion than other locations – some 15% of the population having a disability.

Table 9.5 Households and People with a Disability, 2021

	Households Containing Someone with a Disability		Population with a Disability	
	No.	%	No.	%
Tonbridge & Malling	15,795	29.5%	20,224	15.3%
Kent	211,707	32.7%	281,423	17.9%
South East	1,144,084	30.0%	1,496,340	16.1%
England	7,507,886	32.0%	9,774,510	17.3%

Source: 2021 Census

9.18 The table below shows the same information for sub-areas; this shows broadly similar proportions of the population and households with a disability across all areas – figures being slightly higher in Tonbridge and lower in Malling & Kings Hill.

Table 9.6 Households and People with a Disability, 2021 – sub-areas

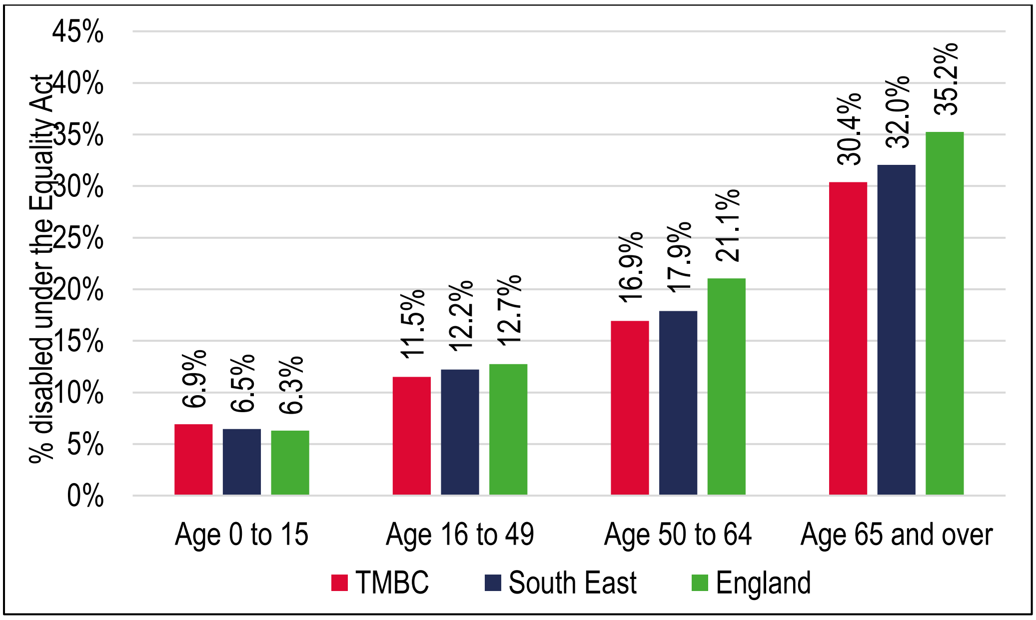
	Households Containing Someone with a Disability		Population with a Disability	
	No.	%	No.	%
Aylesford & Larkfield	4,428	29.4%	5,694	15.4%
Malling & Kings Hill	1,967	28.0%	2,540	13.9%
Medway Facing	1,305	28.8%	1,667	15.1%
Rural	2,799	29.1%	3,543	14.9%
Tonbridge	5,273	30.4%	6,762	16.0%
TMBC	15,772	29.4%	20,206	15.3%

Source: 2021 Census

9.19 As noted, it is likely that the age profile will impact upon the numbers of people with a disability, as older people tend to be more likely to have a disability.

9.20 The figure below shows the age bands of people with a disability. It is clear from this analysis that those people in the oldest age bands are more likely to have a disability. The analysis also shows lower levels of disability in this age band (and all age bands apart from aged 0-15) when compared with the regional and national position.

Figure 4.2: Population with Disability by Age



Source: 2021 Census

Health Related Population Projections

9.21 The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population.

9.22 The analysis undertaken covers both younger and older age groups and draws on prevalence rates from the PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) websites. Adjustments have been made to take account of the age specific health/disabilities previously shown.

9.23 Of particular note are the large increases in the number of older people with dementia (increasing by 51% from 2024 to 2042 and mobility problems (up 45% over the same period).

9.24 Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population.

9.25 When related back to the total projected change to the population, the increase of people aged 65+ with a mobility problem represents around 5% of total projected population growth.

Table 9.7 Projected Changes to Population with a Range of Disabilities – Tonbridge & Malling

Disability	Age Range	2024	2042	Change	% change
Dementia	65+	1,639	2,468	829	50.6%
Mobility problems	65+	4,281	6,214	1,933	45.2%
Autistic Spectrum Disorders	18-64	664	871	207	31.2%
	65+	212	289	77	36.1%
Learning Disabilities	15-64	1,780	2,316	536	30.1%
	65+	472	653	181	38.3%
Impaired mobility	16-64	4,013	4,973	960	23.9%

Source: POPPI/PANSI and Demographic Projections

9.26 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.

9.27 The projected change shown in the number of people with disabilities provides clear evidence justifying delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability.

Need for Specialist Accommodation for Older People

9.28 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The box below shows the different types of older persons housing which are considered.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care (housing with care): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Source: Planning Practice Guidance [63-010]

9.29 The need for specialist housing for older persons is typically modelled by applying prevalence rates to current and projected population changes and considering the level of existing supply.

9.30 There is no standard methodology for assessing the housing and care needs of older people. The current and future demand for elderly care is influenced by a host of factors including the balance between demand and supply in any given area and social, political, regulatory and financial issues.

9.31 Additionally, the extent to which new homes are built to accessible and adaptable standards may over time have an impact on specialist demand (given that older people often want to remain at home rather than move to care) – this will need to be monitored.

9.32 There are a number of 'models' for considering older persons' needs, but they all essentially work in the same way. The model results are however particularly sensitive to the prevalence rates applied, which are typically calculated as a proportion of people aged over 75 who could be expected to live in different forms of specialist housing.

9.33 Whilst the population aged 75 and over is used in the modelling, the estimates of need would include people of all ages.

9.34 Whilst there are no definitive rates, the PPG [63-004] notes that 'the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ for Older People Analysis Tool)'.

9.35 The PPG does not specifically mention any other tools and therefore seems to be indicating that SHOP@ would be a good starting point for analysis.

9.36 Since the PPG was published the Housing Learning and Information Network (Housing LIN) has removed the Shop@ online toolkit although the base rates used for analysis are known.

9.37 The SHOP@ tool was originally based on data in a 2008 report (More Choice Greater Voice) and in 2011 a further suggested set of rates was published (rates which were repeated in a 2012 publications).

9.38 In 2016, Housing LIN published a review document which noted that the 2008 rates are ‘outdated’ but also noting that the rates from 2011/12 were ‘not substantiated’. The 2016 review document therefore set out a series of proposals for new rates to be taken forward onto the Housing LIN website.

9.39 Whilst the 2016 review rates do not appear to have ever led to an update of the website, it does appear from reviewing work by Housing LIN over the past couple of years as if it is these rates which typically inform their own analysis (subject to evidence based localised adjustments).

9.40 For clarity, the table below shows the base prevalence rates set out in the various documents described above. For the analysis in this report the age-restricted and retirement/sheltered have been merged into a single category (housing with support).

Table 9.8 Range of suggested baseline prevalence rates (units per 1,000 people aged over 75) from a number of tools and publications

Type/Rate	SHOP@ (2008)[17]	Housing in Later Life (2012)[18]	2016 Housing LIN Review[19]
Age-restricted general market housing	-	-	25
Retirement living or sheltered housing (housing with support)	125	180	100
Extra care housing or housing-with-care (housing with care)	45	65	30-40 ('proactive range')
Residential care homes Nursing homes (care bedspaces), including dementia	65 45	(no figure apart from 6 for dementia)	40 45

Source: Housing LIN

9.41 In interpreting the different potential prevalence rates, it is clear that:

- The prevalence rates used should be considered and assessed taking account of an authority's strategy for delivering specialist housing for older people. For example, the County Council's Adult Social Care Team want to see more extra care to provide alternatives to the reducing demand for traditional residential care.

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17 Based on the More Choice Greater Voice publication of 2008 (https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf). It should be noted that although these rates are from 2008, they are the same rates as were being used in the online toolkit when it was taken offline in 2019.

18 https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/Housing_in_Later_Life_Toolkit.pdf

19 https://edocs.elmbridge.gov.uk/IAM/IAMCache/3793607/3793607.pdf

- The Housing LIN model has been influenced by existing levels of provision and their view on what future level of provision might be reasonable taking account of how the market is developing, funding availability etc. It is more focused towards publicly commissioned provision. There is a degree to which the model and assumptions within it may not fully capture the growing recent private sector interest and involvement in the sector, particularly in extra care; and
- The assumptions in these studies look at the situation nationally. At a more local level, the relative health of an area's population is likely to influence the need for specialist housing with better levels of health likely to mean residents are able to stay in their own homes for longer.

9.42 These issues are considered to provide appropriate modelling assumptions for assessing future needs. Nationally, there has been a clear focus on strengthening a community-led approach and reducing reliance on residential and nursing care, in particular focusing where possible on providing households with care in their own home, such as through Technology Enabled Care. This could, however, be provision of care within general needs housing, but also care which is provided in a housing with care development, such as in extra care housing.

9.43 We consider that the prevalence rates shown in the 2016 Housing LIN Review are an appropriate starting point, but that the corollary of lower care home provision should be a greater focus on the delivery of housing with care. Having regard to market growth in this sector in recent years, and since the above studies were prepared, we consider that the starting point for housing with care should be the higher rate shown in the SHOP@ report (this is the figure that would align with the PPG).

9.44 Rather than simply taking the base prevalence rates, an initial adjustment has been made to reflect the relative health of the local older person population. This has been based on Census data about the proportion of the population aged 75 and over who have a long-term health problem or disability (LTHPD) compared with the England average.

9.45 In Tonbridge & Malling, the data shows slightly better health in the 75+ population, and so a modest decrease has been made to the prevalence rates.

9.46 A second local adjustment has been to estimate a tenure split for the housing with support and housing with care categories. This again draws on suggestions in the 2016 Review, which suggests that less deprived local authorities could expect a higher proportion of their specialist housing to be in the market sector.

9.47 Using 2019 Index of Multiple Deprivation (IMD) data shows Tonbridge & Malling to be the 236th most deprived local authority in England (out of 317).

9.48 This is a relatively low level of deprivation and suggests a slightly greater proportion of market housing than a local authority in the middle of the range (for housing with support and housing with care).

9.49 The following prevalence rates, expressed as a need per 1,000 people aged 75 and over have been used in the analysis:

- Housing with support (market) – 60 units;
- Housing with support (affordable) – 51 units;
- Housing with care (market) – 28 units;
- Housing with care (affordable) – 12 units;
- Residential care– 36 bedspaces; and
- Nursing care– 40 bedspaces

9.50 It is also important to understand the supply of different types of specialist accommodation with the tables below showing various categories by sub-area.

9.51 The first table is for housing with support and housing with care, which are more likely to be self-contained dwellings, with the second table looking at residential and nursing care bedspaces.

9.52 The total figures have also been standardised based on the number of units per 1,000 people aged 75 and over.

9.53 The analysis shows a total of just under 1,800 units of housing with support or care, which represents around 135 per 1,000 people aged 75 and over. There is some variation by sub-area, with Tonbridge seeing the highest number (544 units), but the highest proportion per population aged 75+ is in Malling & Kings Hill.

9.54 For nursing and residential care, a slightly lower level of supply is shown, with a total of 744 bedspaces, the highest number being in Tonbridge, although the proportion per 1,000 people aged 75+ is highest within the Medway Facing sub-area.

Table 9.9 Current supply of housing with support and housing with care by sub-area

	Housing with support		Housing with care		Total	Popn aged 75+ (2022)	Supply per 1,000 aged 75+
	Market	Afford-able	Market	Afford-able			
Aylesford & Larkfield	93	248	0	114	455	3,310	137
Malling & Kings Hill	223	58	76	0	357	1,511	236
Medway Facing	0	14	200	0	214	955	224
Rural	98	40	51	0	189	2,797	68
Tonbridge	266	166	53	59	544	4,439	123
TMBC	680	526	380	173	1,759	13,012	135

Source: EAC

Table 9.10 Current supply of residential and nursing care bedspaces by sub-area

	Resid-ential care	Nursing care	Total	Popn aged 75+ (2022)	Supply per 1,000 aged 75+
Aylesford & Larkfield	44	115	159	3,310	48
Malling & Kings Hill	59	0	59	1,511	39
Medway Facing	0	123	123	955	129
Rural	23	90	113	2,797	40
Tonbridge	50	240	290	4,439	65
TMBC	176	568	744	13,012	57

Source: EAC

9.55 Taking the supply forward and using the prevalence rates suggested the tables below show estimated needs for different types of housing linked to the population projections.

9.56 The analysis is separated into the various types and tenures, although it should be recognised that there could be some overlap between categories (i.e. some households might be suited to more than one type of accommodation).

9.57 The analysis suggests that for most types and tenures of accommodation, the current provision is broadly in line with need, particularly for housing with care (e.g. Extra-care) and nursing care bedspaces.

9.58 There looks to be modest current shortfalls of housing with support (e.g. sheltered/retirement housing) in both the market and affordable sectors, as well as a more notable shortfall in residential care.

9.59 When projecting forward to 2042, it is estimated there will need to be some additional provision of all types and tenures of housing; in particular housing with support (in both the market and affordable sectors) as a more modest need for housing with care (mainly in the market sector). The analysis also suggests a need for some additional nursing and residential care bedspaces.

Table 9.11 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2024-42 – Tonbridge & Malling

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall / surplus (-ve)	Additional demand to 2042	Shortfall by 2042
Housing with support	Market	60	680	821	141	344	485
	Affordable	51	526	699	173	293	466
Total (housing with support)		111	1,206	1,519	313	637	950
Housing with care	Market	28	380	377	-3	158	155
	Affordable	12	173	170	-3	71	69
Total (housing with care)		40	553	547	-6	229	223
Residential care bedspaces		36	176	486	310	204	514
Nursing care bedspaces		40	568	547	-21	229	208
Total bedspaces		76	744	1,033	289	433	722

Source: Iceni analysis/EAC

9.60 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run.

9.61 The availability of housing options which are accessible to older people will also provide the opportunity for older households to ‘downsize’ which can help improve their quality of life.

9.62 It should also be noted that within any category of need there may be a range of products. For example, many recent market extra-care schemes have tended to be focused towards the ‘top-end’ of the market and may have significant service charges (due to the level and quality of facilities and services).

9.63 Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Council to seek a range of products that will be accessible to a wider number of households if needs are to be met.

Wheelchair User Housing

9.64 The analysis below draws on secondary data sources to estimate the number of current and future wheelchair users and to estimate the number of wheelchair accessible/adaptable dwellings that might be required in the future.

9.65 Estimates of need produced in this report draw on data from the English Housing Survey (EHS) – mainly 2020/21 data. The EHS data used includes the age structure of wheelchair users, information about work needed to homes to make them 'visitable' for wheelchair users and data about wheelchair users by tenure.

9.66 The table below shows at a national level the proportion of wheelchair user households by the age of household reference person. Nationally, around 3.1% of households contain a wheelchair user – with around 1% using a wheelchair indoors.

9.67 There is a clear correlation between the age of household reference person and the likelihood of there being a wheelchair user in the household.

Table 9.12 Proportion of wheelchair user households by age of household reference person – England

Age of household reference person	No household members use a wheel-chair	Uses wheel-chair all the time	Uses wheel-chair indoors only	Uses wheel-chair outdoors only	TOTAL
24 and under	99.4%	0.4%	0.0%	0.1%	100.0%
25-34	99.4%	0.1%	0.1%	0.3%	100.0%
35-49	97.9%	0.4%	0.3%	1.4%	100.0%
50-64	97.1%	0.5%	0.2%	2.2%	100.0%
65 and over	94.3%	1.3%	0.5%	4.0%	100.0%
All households	96.9%	0.6%	0.3%	2.2%	100.0%

Source: English Housing Survey (2020/21)

9.68 The prevalence rate data can be brought together with information about the household age structure and how this is likely to change moving forward – adjustments have also been made to take account of the relative health (by age) of the population. The data estimates a total of 1,345 wheelchair user households in 2024, and that this will rise to 1,813 by 2042.

Table 9.13 Estimated number of wheelchair user households (2024-42) – Tonbridge & Malling

	Prevalence rate (% of households)	Households 2024	Households 2042	Wheelchair user households (2024)	Wheelchair user households (2042)
24 and under	0.8%	628	1,442	5	12
25-34	0.5%	6,385	9,022	31	43
35-49	1.3%	14,622	20,101	196	269
50-64	1.9%	16,669	19,908	315	376
65 and over	4.7%	17,082	23,788	799	1,112
All households	-	55,386	74,260	1,345	1,813

Source: Derived from a range of sources

9.69 The finding of an estimated current number of wheelchair user households does not indicate how many homes might be needed for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation, or a move to an alternative home.

9.70 Data from the EHS shows that of the 814,000 wheelchair user households, some 200,000 live in a home that would either be problematic or not feasible to make fully 'visitable' – this is around 25% of wheelchair user households.

9.71 Applying this to the current number of wheelchair user households across the Borough gives a current need for 336 additional wheelchair user homes. If the projected need is also discounted to 25% of the total (on the basis that many additional wheelchair user households will already be in accommodation), then a further need for 117 homes in the 2024-42 period can be identified. Added together this leads to a need estimate of 453 wheelchair user homes – equating to 25 dwellings per annum.

Table 9.14 Estimated need for wheelchair user homes, 2024-42

	Current need	Projected need (2024-42)	Total current and future need
Tonbridge & Malling	336	117	453

Source: Iceni Analysis

9.72 Furthermore, information in the EHS (for 2020/21) also provides national data about wheelchair users by tenure. This showed that, at that time, around 6.7% of social tenants were wheelchair user (including 1.8% using a wheelchair indoors/all the time), compared with 2.6% of owner-occupiers (0.8% indoors/all the time).

9.73 These proportions can be expected to increase with an ageing population but do highlight the likely need for a greater proportion of social (affordable) homes to be for wheelchair users.

Table 9.15 Proportion of wheelchair user households by tenure of household reference person – England

Tenure	No household members use a wheel-chair	Uses wheel-chair all the time	Uses wheel-chair indoors only	Uses wheel-chair outdoors only	TOTAL
Owners	97.4%	0.6%	0.2%	1.8%	100.0%
Social sector	93.3%	1.3%	0.5%	4.9%	100.0%
Private renters	98.6%	0.2%	0.2%	1.0%	100.0%
All households	96.9%	0.6%	0.3%	2.2%	100.0%

Source: English Housing Survey (2018/19)

9.74 To meet the identified need, the Council could seek a proportion (potentially up to 5%) of all new market homes to be M4(3) compliant and potentially a higher figure in the affordable sector (potentially up to

10%). These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.

9.75 As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs.

9.76 It is worth noting that the Government has now reported on a consultation (Raising Accessibility Standards for New Homes[20]) on changes to the way the needs of people with disabilities and wheelchair users are planned for as a result of concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) is being compromised on viability grounds.

9.77 The key outcome is: ‘Government is committed to raising accessibility standards for new homes. We have listened carefully to the feedback on the options set out in the consultation and the government response sets out our plans to mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes’. This change is due to shortly be implemented though a change to building regulations.

9.78 The consultation outcome still requires a need for M4(3) dwellings to be evidenced, stating ‘M4(3) (Category 3: Wheelchair user dwellings) would continue as now where there is a local planning policy in place in which a need has been identified and evidenced. Local authorities will

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[20] https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes

need to continue to tailor the supply of wheelchair user dwellings to local demand'.

9.79 As well as evidence of need, the viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering all or any of a policy target.

9.80 It should be noted that local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.

9.81 A further option for the Council would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights.

9.82 This would address any under-delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

Engagement with County Council

9.83 Through engagement, the County Council voiced its desire to continue to move away from residential care to extra care. They also want to provide in-situ support and more accommodation built to the principles of lifetime home standards to support people without being specialist housing.

9.84 The County Council are particularly keen to move younger adults out of specialist housing and into the community. To fund this, they would like to use S106 payments for individual adaptations. Although they were keen to stress it was less about the house than the wider environment.

9.85 The County Council raised the issue that PRPs are less empathetic to people with complex needs, mental health issues, dementia, etc., and the strategy would like to move people to mainstream housing to ensure they can be provided with continuous support without having to move around.

9.86 The PRP's housing management policies need to be applied more flexibly to reflect individual needs rather than just a blanket approach. They need to be less distant and more about local management, as this will avoid people being disadvantaged by a call centre approach, when often they have poor communication.

9.87 The former strategy was to focus on the delivery of Extra-Care in response to the lack of appropriate stock. However, they now want to improve the general housing stock to allow a greater number of people to access care within their own homes without having to move.

9.88 By increasing the supply of suitable general housing properties, this will allow older people to move into better-equipped accommodation and free up homes for families.

9.89 There hasn't been a lot of County Council provided extra-care housing delivered in Tonbridge and Malling, and KCC are keen for one to be delivered in the area.

9.90 Historically, KCC have struggled to get schemes delivered in Tonbridge and Malling. Rosewell House in Tonbridge does have some provision for Extra Care, but KCC are generally not involved in the scheme.

9.91 Overall, the county council are very much encouraging extra care to be delivered, particularly if it has a dementia wing and where it allows couples to live together. KCC also want extra care to increase its capability to meet complex care, including providing night care.

9.92 Much of the extra-care housing is for people aged 55 and older, but the County council are keen for people in their 40s and 50s to access it where they need it.

9.93 Extra Care schemes are designed with the needs of those with mobility issues in mind (level access, wheelchair turning space, etc.), which makes them suitable for younger disabled people as well as older. Therefore, planning permission should be applied flexibly.

9.94 The County Council are finding it particularly difficult to house people with catastrophic injuries and early onset conditions, such as MS. There are regular horse-riding accidents in the area, and some housing for this group could help free up beds. Similarly, for those who are coming out of hospital, who often meet long delays due to an inability to access suitable housing and as a result are often forced to stay in hospital longer than required and therefore blocking bedspaces.

9.95 The County Council noted that, broadly speaking, West Kent has seen too much nursing care developed. More widely, there are issues about sourcing nurses in the area, which may contribute to a falling supply or a new supply not coming forward.

9.96 Part of this is driven by Kent being a peninsula and low-wage workers needing to live locally.

9.97 Generally, KCC do not consider the cost of housing to be an issue, but Kent is a large area to cover, and public transport is poor, particularly at night. One solution would be the promotion of key worker accommodation which could meet that demand.

Summary – Older and Disabled People

9.98 The data shows that Tonbridge & Malling has a similar age structure in terms of older people as is seen regionally and nationally, but lower levels of disability compared with the national average.

9.99 The older person population shows high proportions of owner-occupation, and particularly outright owners who may have significant equity in their homes (75% of all older person households are outright owners).

9.100 The older person population is projected to increase notably moving forward. An ageing population means that the number of people with disabilities is likely to increase. Key findings for the 2024-42 period include:

- a 38% increase in the population aged 65+ (potentially accounting for 24% of total population growth);
- a 51% increase in the number of people aged 65+ with dementia and a 45% increase in those aged 65+ with mobility problems;
- a need for around 950 additional housing units with support (sheltered/retirement housing) – split roughly equally between market and affordable housing;
- a need for around 220 additional housing units with care (e.g. extra-care) – the majority (around 70%) in the market sector. The need and supply of housing with care currently looks to be fairly balanced. This would address the needs of all ages requiring care;
- a need for additional nursing and residential care bedspaces (around 720 in the period); and
- a need for around 450 dwellings to be for wheelchair users (meeting technical standard M4(3)).

9.101 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair-user dwellings as well as providing specific provision of older persons such as Extra Care or sheltered accommodation.

9.102 Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) – wheelchair user dwellings in the market sector (a higher proportion of around 10% in the affordable sector).

9.103 Where the authority has nomination rights, the supply of M4(3) dwellings would be wheelchair-accessible dwellings (M4(3)(2)a - constructed for immediate occupation), and in the market sector they should be wheelchair-user adaptable dwellings (M4(3)(2)b - constructed to be adjustable for occupation by a wheelchair user).

9.104 It should, however, be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

9.105 In framing policies for the provision of specialist older persons accommodation, the Council will need to consider a range of issues.

9.106 This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this, the viability of provision).

9.107 There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for through service charges.

10. Other Specific Groups

Custom and Self Build

10.1 As of 1st April 2016, and in line with the Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority's area to build their own self-build and custom houses.

10.2 Furthermore, in line with the continued Government drive to support the self and custom-build sector, the latest National Planning Policy Framework (paragraphs 71 and 73(b), December 2024) duly recognises that it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.

10.3 As part of this, the Framework (paragraph 63) states that:

> *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including…people wishing to commission or build their own homes" (our emphasis)*

10.4 The Self-Build and Custom Housebuilding Planning Practice Guidance is a material consideration and draws on legislation set out under the 2015 Act and the 2016 Act but provides wider guidance on assessing demand and supporting self-build development.

10.5 In line with the legal duty placed on local authorities by the 2016 Act, the PPG reminds us that relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.

10.6 The level of demand is established by reference to the number of entries added to an authority's register during a 'base period'.

10.7 The first base period began on the day on which the register is established. Each subsequent base period is 12 months beginning immediately after the end of the previous base period. Subsequent base periods will therefore run from 31st October to 30th October each year.

10.8 At the end of each base period, relevant authorities have 3 years in which to meet their legal duty and grant permission for an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period.

10.9 The PPG states that local planning authorities should use the demand data from the registers in their area, but this should also be supported as necessary by additional data from secondary sources, to understand and consider future need for this type of housing in their area when preparing housing needs assessments.

10.10 Concerning what a 'duty to grant planning permission etc' means, the PPG states that:

> *"Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period."*

10.11 In respect of what having a 'duty as regards registers' means, the PPG states that:

> *"Section 2(1) of the Self-build and Custom Housebuilding Act 2015 places a duty on relevant bodies to have regard to each self-build and custom housebuilding register, <u>including Part 2 of</u>*

the register (where a register is in two parts), that relates to their area when carrying out their planning, housing, land disposal and regeneration functions." (our emphasis)

10.12 The PPG[21] is clear that self-build or custom build helps to diversify the housing market and increase consumer choice. Self-build and custom housebuilders choose the design and layout of their homes and can be innovative in both their design and construction.

Levelling Up and Regeneration Act (2023)

10.13 The Levelling Up and Regeneration Act (2023) made some amendments to the 2015 Self and Custom Housebuilding Act which advised how the supply and demand of self and custom build housing plots can be assessed.

10.14 When assessing demand, the LURA inserted in section 6 of the 2015 Act the following:

"(a) the demand for self-build and custom housebuilding in an authority's area in respect of a base period is the aggregate of—

> *(i) the demand for self-build and custom housebuilding arising in the authority's area in the base period; and*
>
> *(ii) any demand for self-build and custom housebuilding that arose in the authority's area in an earlier base period and in relation to which—*

(A) the time allowed for complying with the duty in subsection (2) expired during the base period in question, and

(B) the duty in subsection (2) has not been met;

[21] Paragraph: 16a Reference ID: 57-016a-20210208

(aa) the demand for self-build and custom housebuilding arising in an authority's area in a base period is evidenced by the number of entries added during that period to the register under section 1 kept by the authority;"

10.15 As a result, although each authority still has 3 years to meet the need that arises from the register, this need must now be counted cumulatively. For example, the need as of the 30th of October 2024 will be the cumulative demand shown in all base periods prior to the 30th of October 2021.

10.16 When considering the supply of plots LURA removes section 6(c) of the 2015 Act which read:

"development permission is "suitable" if it is permission in respect of development that could include self-build and custom housebuilding"

10.17 This change means that the Council will therefore need to demonstrate that serviced plots have resulted in self and custom-build development rather than what could be self and custom-build plots, for example, on the assumption of a CIL exemption.

10.18 Essentially, this means that in order for planning permissions to be counted towards the supply of self and custom build homes, there needs to be evidence to show that this is what the development is for.

10.19 The exact detail of what can be considered appropriate evidence of a dwelling or planning application being specifically for self and custom build is still to be confirmed, but appeal case law gives some indication of what this may be.

10.20 Evidence that would confirm that a development is specifically for self and custom-build may include:

- Planning Condition attached to approval requiring the development to be carried out for self-build; or

- Confirmation through S106 agreement for self-build; or

- Requirement for the self-build nature of the scheme to be included within the description of the development.

10.21 On historic permissions, further evidence will likely be required to demonstrate that the development was self and custom-built, often this will be in the Design and Access Statement.

10.22 Although the regulations of the evidence for what constitutes an appropriate permission for self-build are not yet known. It can be expected that regulations will reflect the 2015 Act and existing PPG and demonstrate that the applicant/occupant has had “primary input” into the design of the scheme.

10.23 It is also likely that applications to replace existing dwellings with new self-build properties will constitute a fair proportion of the self-build supply, even though they do not result in a net gain of housing.

10.24 Going forward, the Authorities will need to continue to monitor applications for self-build dwellings in Tonbridge and Malling. Ensuring that all supply permissions are evidenced to be self-build will also be important to ensure that an assessment on whether the duty is properly met can be made.

10.25 It may also be prudent for the Council to retrospectively assess supply permissions to properly ascertain which permissions are specifically for the carrying out of self and custom-build development.

Council Register

10.26 The Council introduced a Local Connection test, a Financial Viability test and an administration fee to the register on the 1st of August 2023. The Local Connection Test requires applicants to demonstrate that:

- They have been a permanent resident of the Borough for three consecutive years, prior to application OR;

- They are currently employed within the Borough and have been for a minimum of the past twelve months (consecutively) OR;

- They are current self-employed, with an ongoing viable venture where the work is within the Borough, and has been for a minimum of twelve months (consecutively) OR;

- They are in the service of the regular armed forces of the Crown (defined within the meaning of section 374 of the Armed Forces Act 2006) or have left regular service within the past 5 years immediately preceding their application on the Self-Build Register.

10.27 The Financial Viability Test requires applicants to provide evidence to demonstrate they have sufficient funds to purchase a plot of land and fund the construction of a self-build project.

10.28 The Council guidance is not explicit on what this constitutes but suggests that this would be in the region of £241,500. It is not clear if the Council requires this to be proof of cash or asset funds or would also accept proof of a self-build mortgage offer to allow entry onto Part 1 of the register.

10.29 The Council also require an initial subscription payment of £33 for register entry, followed by annual payments of £16.50 to stay on the register.

10.30 The Table below shows the number of register entries in Tonbridge and Malling, as well as the number of supply permissions for Self and Custom build dwellings that have been approved.

10.31 As previously mentioned, changes made in the LURA 2023 require the need for Self and Custom Build dwellings to be assessed cumulatively across all Base Periods. As such, towards the end of Base Period 10, a total of 203 people/households had registered on Tonbridge and Malling’s self-build register, which equates to 22 per base period.

Against which 83 plots were permitted for self and custom-build dwellings, 9 per annum.

Table 10.1 Self and Custom Build Register,

Base Period	Annual Entries*	Permissions
Base Period 1 (1st April 2016 to 30th October 2016)	25	
Base Period 2 (31st October 2016 to 30th October 2017)	59	
Base Period 3 (31st October 2017 to 30th October 2018)	32	0
Base Period 4 (31st October 2018 to 30th October 2019)	28	0
Base Period 5 (31st October 2019 to 30th October 2020)	21	0
Base Period 6 (31st October 2020 to 30th October 2021)	20	0
Local Connection Test Introduced		
Base Period 7 (31st October 2021 to 30th October 2022)	10	82
Base Period 8 (31st October 2022 to 30th October 2023)	7	1
Base Period 9 (31st October 2023 to 30th October 2024)	1	0
Base Period 10 (31st October 2024 to 30th September 2025)	1	0
Total	**203**	**83**
Average (divided by 9.5)	**21**	**9**
Average since local connection Test	5	21

*Source: Right to Build Register Monitoring *individuals and groups*

10.32 The council have 3 years from an individual's entry to the register to permit a plot to satisfy the need they create. Therefore, as of the 30th of October 2024, the need is the cumulative total entries on the register at the end of Base Period 6 (30th of October 2021), which was 184.

10.33 On the 30th of October 2025, the need will rise to the cumulative total entries on the register at the end of Base Period 7 (30th of October 2022), which would be 194.

10.34 With 83 suitable permissions allowed in Tonbridge and Malling, the need is currently not being met with an overall supply shortfall of 101 plots; this would rise to 111 plots in October 2025 if no further suitable permissions are allowed in the current base period.

10.35 As well as the backlog need, in taking this assessment forward, the council will need to address the scale of any future registrations. An indication of this can be garnered by past trends, and these suggest a need for 22 suitable plots per base period.

10.36 However, the numbers entering the register since the Local Connection Test was introduced have fallen significantly to just 5 per annum. This could indicate falling demand, although ultimately the Council will need to respond to the scale of any future registrations.

Supply Monitoring

10.37 As discussed earlier, changes made by the Levelling Up and Regeneration Act (2023) have amended how supply permissions can be counted.

10.38 Going forward, we recommend that the Council consider monitoring receipts of CIL Self-Build Exemption Form 7 **Part 1 and Part 2** if received, as well as counting permissions given through the development management process.

10.39 This may be aided by requiring self-build developments to submit a Self-Build Delivery Statement at validation stage or during the decision making process that confirms a development will be being brought forwards as a self and custom build development. Examples of this include in Mid-Sussex[22] as well as in East Suffolk[23].

10.40 Supply permissions should be able to demonstrate that they will result in the delivery of a self and custom build dwelling, legal agreements such as Unilateral Undertakings and S106 agreements can also confirm

[22] Self-build and Custom Build Statement
[23] Custom-and-Self-build-Delivery-Statement-Template.pdf

this, as can conditions attached to the planning permissions and descriptions of development specifying self and custom build.

Broader demand evidence

10.41 To supplement the data from the Council's register(s), we have looked to secondary sources as recommended by the PPG, which, for this report, is data from NaCSBA – the National Custom and Self-build Association.

10.42 First, it is worth highlighting that the October 2020 survey undertaken by YouGov on behalf of NaCSBA found that 1 in 3 people (32%) are interested in building their own home at some point in the future, including 12% who said they were very interested.

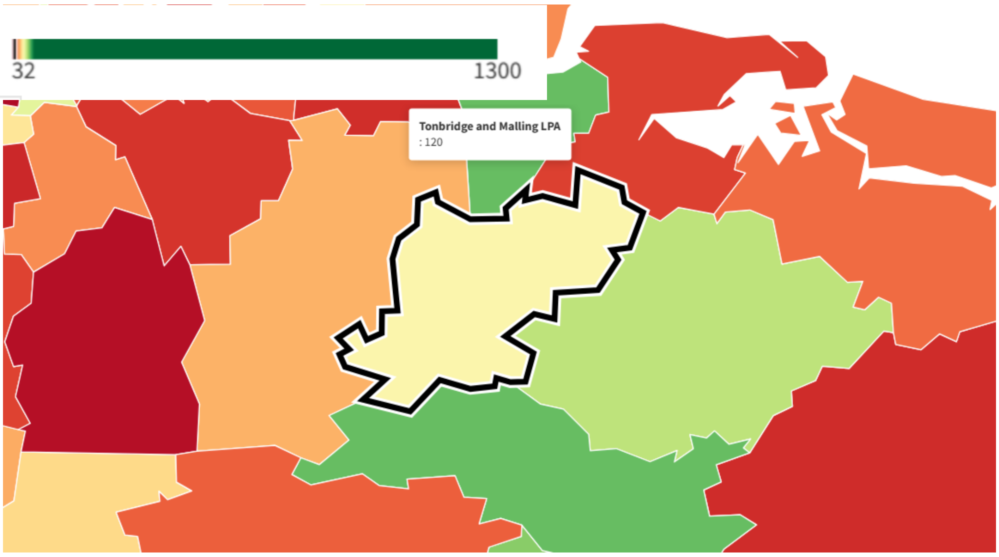
10.43 Notably, almost half (48%) of those aged between 18 and 24 were interested in building their own home, compared to just 18% of those aged 55 and over.

10.44 This is notable as, traditionally, self-build has been seen as the reserve of older members of society aged 55 and over, with equity in their property.

10.45 Secondly, we can draw on NaCSBA data to better understand the level of demand for serviced plots in TMBC in relative terms. The association published an analysis with supporting maps and commentary titled "Mapping the Right to Build" in 2020.

10.46 This document includes an output on the demand for serviced plots as a proportion of the total population relative to all other local authorities across England (see Figure below).

Figure 10.1 Total registrations per 100,000 population in Tonbridge and Malling in 2020



Source: NaCSBA

10.47 This shows that the demand in TMBC was 120 per 100,000 population. Based on the population of TMBC in 2021 this would equate to a need for around 158 serviced plots.

10.48 Despite the figure from NaCSBA being slightly lower than the level of demand shown on the register, the Council still must permit enough plots for self and custom build as indicated by the register.

Policy Response

10.49 The Self-Build and Custom Housebuilding PPG sets out how authorities can increase the number of planning permissions which are suitable for self-build and custom housebuilding and support the sector.

10.50 The PPG[24] Is clear that authorities should consider how local planning policies may address identified requirements for self and custom housebuilding to ensure enough serviced plots with suitable permission

[24] Paragraph: 025 Reference ID: 57-025-20210508

come forward and can focus on playing a key role in facilitating relationships to bring land forward.

10.51 There are several measures which can be used to do this, including but not limited to:

- supporting Neighbourhood Planning groups where they choose to include self-build and custom-build housing policies in their plans;
- working with Homes England to unlock land and sites in wider public ownership to deliver self-build and custom-build housing;
- when engaging with developers and landowners who own sites that are suitable for housing, encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested; and
- working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.

10.52 An increasing number of local planning authorities have adopted specific self-build and custom housebuilding policies in their respective Local Plans to encourage delivery, promote and boost housing supply.

10.53 There are also several appeal decisions in the context of decision-making which have found that paragraph 11(d) of the Framework is engaged in the absence of specific policy on self-build housing when this is the focus of a planning application.

10.54 A specific policy would typically express support for self-build and custom housebuilding and require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of sites solely for their use.

10.55 This is often known as the “Teignbridge Rule” after the first District Council to adopt the first self-build policy. In this instance, 5% of all developable housing land is allocated for custom and self-build on larger sites.

10.56 We consider that to respond to demand in the sector, and in response to the PPG's requirements, the Council should support, through planning policy, the submission and delivery of self-build and custom housebuilding sites, where land opportunities arise and where such schemes are consistent with other planning policies.

10.57 If the Council do not wish to pursue an approach seeking contributions from larger sites, then given typical build-out rates, it should only seek to enforce such plots on larger sites.

10.58 This could be applied to sites of 70 dwellings or more based on average annual completions on sites with one outlet at 69 units. This means that anything above this threshold would deliver over a longer period than 12 months.

10.59 In applying this policy, the Council should be mindful of the supply of sites of this scale and the likely aggregate contributions from them. Such a policy approach will ensure a longer-term supply of suitable custom and self-build plots but will also be flexible if demand falls.

10.60 These plots should be marketed appropriately for 6/12 months, and then the developer can revert to delivering these sites as market accommodation without significantly elongating the build-out period.

10.61 The Council may also wish to consider making the first three months of marketing these plots to those with a local connection or on the custom and self-build register, with the remaining time widening it out to anyone else.

10.62 A further consideration for the Council is that, when demonstrating supply to meet this demand, the Levelling Up and Regeneration Bill makes it harder for Councils to count CIL exemption sites.

10.63 They now must demonstrate that these homes are specifically for self or custom-built occupiers. The Council should therefore adapt its monitoring accordingly.

Children's Homes

10.64 This report summarises the key points from Kent County Council's **Children's Sufficiency Strategy 2022–2027** and **2024 Update**, outlining the current and projected needs for residential care placements for children and young people.

10.65 To this, we have added notes from our consultation with Kent County Council to ensure that we reflect the most recent data, but also any TMBC-specific issues.

10.66 The Care Standards Act 2000 defines a Children's Home stating 'an establishment is a children's home… if it provides care and accommodation wholly or mainly for children'. 'Wholly or mainly' means that most of the people who stay at a home must be children.

- Key legislation relating to the accommodation and maintenance of a looked-after child is defined and outlined in Sections 22A to 22D of the Children Act 1989. The legislation provides a framework within which decisions about the most appropriate way to accommodate and maintain children must be considered:

- Section 22A of the Children Act 1989 imposes a duty on the responsible authority when a child is in their care to provide the child with accommodation.

- Section 22B of the Children Act 1989 sets out the duty of the responsible authority to maintain a looked-after child in other respects apart from providing accommodation.

- Section 22C of the Children Act 1989 sets out the ways in which a looked-after child is to be accommodated.

- Section 22D of the Children Act 1989 imposes a duty on the responsible authority to formally review the child's case before making alternative arrangements for accommodation.

- Section 22G of the Children Act 1989 requires local authorities to take strategic action with respect to those children they look after and for whom it would be consistent with their welfare for them to be provided with accommodation within their own local authority area.

10.67 In a Written Ministerial Statement[25] (WMS) made in May 2023, the Housing and Planning Minister reminded local authorities of their requirement to assess the housing need of different groups in the community, including "accommodation for children in need of social services care".

10.68 The WMS statement said, "Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs and all parties in the development process should work together closely to facilitate the timely delivery of such vital accommodation for children across the country".

10.69 The WMS follows on from the Department of Education Implementation Strategy.[26] to fix children's social care from February 2023. The "Stable Homes Built on Love" Strategy has undergone a recent consultation, the results of which have not yet been published.

10.70 The strategy outlines an ambition to transform Children's Care through six pillars. The first of these pillars makes it clear that providing support to families is the first priority. This ensures that children can remain in

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[25] https://questions-statements.parliament.uk/written-statements/detail/2023-05-23/hcws795

[26] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147317/Children_s_social_care_stable_homes_consultation_February_2023.pdf

their family home for as long as possible (Pillar 1) and then within their wider family if this is not possible (Pillar 3).

10.71 If both the immediate and wider family cannot look after a child, then Pillar 4 seeks to ensure that “when care is the best choice for a child, the care system must provide stable, loving homes close to children’s communities.”

10.72 To achieve this, the strategy aims to increase and support foster carers and develop a programme to support improvements in the quality of leadership and management in the children’s homes sector.

10.73 The report sets out a mission to “see an increase of high-quality, stable and loving homes available for every child in care, local to where they are from”. To do this, it suggests that an immediate action is to “boost the number of the right homes in the right places available for children as a matter of urgency.”

10.74 The strategy notes, “Local authorities have primary responsibility for the children in their care. This includes ensuring there is sufficient accommodation locally to meet the range of needs of children in care in their area, and that there is a “statutory duty to ensure there is sufficient provision for their children in care”.

10.75 It also states that the DfE “will continue to build on our work reforming supported accommodation for 16- to 17-year-olds. Semi-independent provision, including supported lodgings, can be the right option for some older children, but only where it is high-quality, and the young person is ready for the level of independence it promotes.”

10.76 The Department will also continue “with the Children’s Home Capital Programme, which has seen £259 million of capital funding invested to increase provision in local authority-run open and secure children’s homes. We are working with local authorities to create new children's homes and increase provision in their local area.”

10.77 At a similar time, the government also launched a consultation on the “Children’s Social Care National Framework.[27]” and the “Children’s Social Care Dashboard”. The Framework sets out some of the outcomes to be measured, including Outcome 4 relating to those seeking to ensure “children in care and care leavers have stable, loving homes”.

10.78 The indicators include the percentage of children in care living in foster care and living in residential care, and the distance of placements from home. This is important to ensure the stability of schooling and contact with their siblings. The framework recognises that this will mean prioritising foster homes rather than residential homes.

10.79 The outcome can also be achieved by leaders undertaking “sufficiency planning and work with other local authorities and partners to jointly invest in care options that meet the future needs of children.”

Current Position

10.80 The *2024 Kent County Council Sufficiency Strategy review* highlights that there are approximately 157 children placed in residential care in 2023/24, which is higher than the initial forecasted number of placements of 134.

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[27] https://consult.education.gov.uk/children2019s-social-care-national-framework/childrens-social-care-national-framework/supporting_documents/Childrens%20Social%20Care%20National%20Framework%20Consultation%20Document%20February%202023.pdf

10.81 This increase is primarily a result of a national shortage of foster carers, limited regulated provision for under 16s and increasing complexity of needs and safeguarding factors amongst others.

10.82 KCC's overarching vision is to ensure that all children have a place to call home. It is key for the Council that every child lives in a home that is right for their individual care needs.

10.83 Ofsted data suggests that there are 102 Ofsted registered Children's Homes across Kent, 7 of which are operated by Kent County Council, with the remainder operated by the Private/Voluntary sector.

10.84 None of the KCC-operated homes are within the Tonbridge or Maidstone and Malling parliamentary constituencies, although some are nearby in Tunbridge Wells.

10.85 There are 5 privately operated children's homes in the Maidstone and Malling constituency. These are operated by My Tribe Homes Ltd, Cedar House Ltd and Full Circle Living, these provide 15 bedspaces overall.

10.86 Overall, the need for residential bedspaces in Kent is increasing as well as the cost for such placements, this is due to several factors such as; declining number of Foster Carers, children having to remain in residential children's homes even though their support and care needs do not require this and a reliance on spot purchased placements.

10.87 Although KCC do operate some residential care homes for children, much of the market remains operated by the private sector. Equally, the market power of KCC is quite limited within Kent; costs for privately provided and spot-purchased bedspaces are high and often more than the Council can afford.

10.88 There are a significant number of children placed in homes in Kent by other Local Authorities who come from outside the County, London Boroughs, for example, who are often able to afford the higher costs.

10.89 Many private providers are becoming somewhat risk-averse in accepting children with more complex needs, and KCC have identified this as an issue, and they are aiming to deliver more KCC residential care accommodation in future.

10.90 It is estimated that an additional 10 homes would be enough to serve children with very complex needs in Kent. Infrastructure funding of £3.8 million is due to be set aside in the 2025 KCC budget to allow for this[28].

10.91 This funding is not focused on individual authorities but rather across the entire M2/M20 corridor, which includes Tonbridge and Malling, as staff are often easier to recruit in this area due to the better transport links.

10.92 KCC Children's Services are very keen to work with the individual Local Authorities in the corridor to do this and are particularly keen to ensure that there is political buy-in for this.

10.93 Going forward, there is some uncertainty in how Children's Services and, particularly, residential care, will be handled in the devolution process.

10.94 Currently, KCC operates Kent-wide, allowing for oversight at a strategic level. There is concern that, in whatever form devolution takes in Kent in the future, this oversight may be lost. This is part of the reason why Children's Services at KCC are pushing for buy-in from Councils across Kent now.

[28] Record of Decision

Recommendations

10.95 The WMS statement said, “Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs”

10.96 The County policy direction is to provide in-situ support, followed by familial and foster support. Therefore, the demand for care homes will largely be determined by the success of these policies. Where this is not possible, then local authorities will be required to provide safe accommodation in the right places.

10.97 The Council should continue to work with the County Council to identify sites or homes which are suitable for additional solo or small-group homes capable of supporting children with complex and co-occurring needs (mental health, ASC, trauma).

10.98 In some cases, it may be appropriate to assist KCC in identifying existing council-owned assets that may be appropriate for conversion into residential care accommodation.

10.99 Consideration should also be given by the Council to engaging with partner agencies like Health, Education/Early Years and the voluntary sector to strengthen their role in supporting increased placement provision locally and county-wide, for children with complex needs.

10.100 The Council should ensure that any new 3–4 bed homes or multi-building units that are developed are developed in close collaboration with existing service providers. This need could also be met by seeking provision on larger strategic sites.

10.101 Such sites should align with the most appropriate locations according to Ofsted's Location Assessment[29] For such accommodation. In summary, this includes ensuring safeguarding concerns are met and that children have access to services.

10.102 To ensure that the KCC has access to any new provision, TMBC may wish to adopt a policy similar to that of Lancaster City, whereby any additional children's residential care home permissions/licences are only permitted if the Council get first refusal of placement.

10.103 As well as new accommodation, the council should also support the targeted expansion of existing specialised provision.

10.104 There will also be a need for supported accommodation for young adults leaving care, and the Council should work with Private Registered Providers to explore opportunities to provide this through developer contributions and in the existing stock.

Service Families

10.105 MoD location statistics show that in April 2024, there were no MoD personnel based in Tonbridge and Malling. This represents a slight decline from 10 in April 2016.

10.106 Although the MOD have not stationed anyone in the borough the presence of the Royal British Legion Industries in Aylesford mean that many ex-service personnel live in the borough already.

29 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/339545/Children_s_homes_regulations_amendments_2014.pdf

Policy Implications

10.107 Overall, the presence of regular forces in TMBC is not significant and is unlikely to have any implications on local affordability or the demand for housing. Therefore, a specific Local Plan policy for this group is not required.

10.108 Annexe 2 of the NPPF identifies Military Personnel as Essential Key Workers. As such, accommodation specifically comes under the definition of affordable housing.

10.109 Depending on their incomes, this group will already be accounted for within the affordable housing need and will largely not be additional to it.

10.110 Although we do not recommend delivery of First Homes and the government has moved away from it as a product, the Planning Practice Guidance for First Homes allows local authorities to set out criteria for accessing such housing. One such criterion could be a key worker requirement, which would include service personnel, should the council seek to deliver first homes.

10.111 The PPG also stipulates that “local connection criteria should be disapplied for all active members of the Armed Forces, divorced/separated spouses or civil partners of current members of the Armed Forces, spouses or civil partners of a deceased member of the armed forces (if their death was wholly or partly caused by their service) and veterans within 5 years of leaving the armed forces”.

10.112 The most acute and pressing issue is likely to be finding accommodation for those transitioning out of the forces, as well as existing personnel who are seeking to buy in the Borough.

10.113 Affordable Home Ownership could play a part in meeting this demand as it would provide a discounted route to home ownership. Although, as noted previously, this could be at the expense of other tenures which typically address households in more acute need i.e. affordable homes to rent.

10.114 In addition, the Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations ensure that service personnel (including bereaved spouses or civil partners) are allowed to establish a 'local connection' with the area in which they are serving or have served.

10.115 This means that ex-service personnel would not suffer a disadvantage from any 'residence' criteria chosen by the Local Authority in their allocations policy.

Specific Groups - Summary

Custom and Self Build

10.116 In Tonbridge and Malling, as of the end of Base Period 9, a total of 202 households/individuals had registered on the self-build register. The cumulative need the council must have met by October 30th, 2024, is 184 entries. This will rise to 194 on October 30th, 2025

10.117 Our analysis identifies a current supply shortfall of 101 plots as of October 30th, 2024, which would increase to 111 by October 2025 if no further suitable permissions are granted.

10.118 The Council will need to meet this backlog as well as continue to meet the newly arising need on the register. This will be in the region of 22 plots per base period based on past trends although more recent trends are closer to 5 entries per base period.

10.119 As a general rule, the Council should be supportive of opportunities for Self and Custom build development within the Local Plan and could potentially require a proportion of plots on larger schemes to be marketed for Self or Custom Build use.

10.120 Other local authorities have sought 5% of serviced plots on sites over 70 units to be marketed for self and custom build use for a period of 6 months before reverting back to general housing if interest does not transpire.

Children's Homes

10.121 Kent County Council overarching vision for Children in Care is to ensure that all children have a place to call home. It is key for the Council that every child lives in a home that is right for their individual care needs.

10.122 There are currently no KCC-operated residential homes in Tonbridge and Malling.

10.123 KCC are hoping to provide c.10 new residential homes for children with complex needs across the County.

10.124 Specific locations for these homes have not yet been identified, however, Children's Services at KCC are keen to work closely with all Local Authorities within the M2/M20 corridor to identify sites and locations that may be suitable for use as a children's residential home.

10.125 To ensure that KCC has access to any new provision, Tonbridge and Malling may wish to adopt a policy similar to that of Lancaster City whereby any additional children's residential care home permission/licences are only permitted if the Council get first refusal of placement.

Service Families

10.126 MoD location statistics show that in April 2024, there were no MoD personnel based in Tonbridge and Malling.

10.127 Overall, the presence of regular forces in TMBC is not considered to be significant and is unlikely to have any implications on local affordability, and therefore, there is no policy requirement for this group.

11. Summary and Conclusions

11.1 This Strategic Housing Market Assessment for Tonbridge and Malling, aims to inform the development of the Local Plan for the period 2024 to 2042. The analysis highlights a significant need for housing across various tenures and dwelling sizes, underpinned by an aging population, worsening affordability, and a requirement to boost housing supply. The key conclusions and policy recommendations are as follows.

Housing Market Area

11.2 Based on migration and commuting analysis, Tonbridge and Malling lacks the self-containment levels to be its own HMA. The West Kent HMA, encompassing Tonbridge and Malling, Tunbridge Wells, Maidstone, and Sevenoaks, remains the most reasonable position. This is supported by combined self-containment rates exceeding 70% for combinations of these areas.

11.3 The report has also sought to consider specific sub-areas within Tonbridge and Malling; a Tonbridge sub-area (south, with links to Tunbridge Wells), a Medway-facing area (north, linked to Medway towns), Malling and Kings Hill, Aylesford and Larkfield (both with in-commuting draws but different stock and prices), and the remaining rural parts (high prices, links to north, south, and Sevenoaks).

Housing Stock

11.4 As of 2021, Tonbridge and Malling had 55,487 dwellings and 53,536 households, indicating an approximate 3.5% vacancy rate. Housing delivery has averaged 242 dwellings annually since 2015/16, but significantly increased to 483 dwellings per annum since 2021/22.

11.5 The housing stock is characterised by a much higher proportion of semi-detached properties (41.9%) compared to wider areas and a relatively high level of owner-occupation (72.1%).

Housing Market

11.6 In the year to September 2024, the median property price in Tonbridge and Malling was £390,000, which exceeds regional and national equivalents. Median prices have increased by 57.6% over the last 10 years, which is below regional growth but above national growth.

11.7 Affordability has significantly deteriorated in the last 20 years, with median prices now over 11 times the median earnings of those working in the borough. A notable fall in sales since 2020 reflects broader macroeconomic issues like interest rates and the cost-of-living crisis.

Private Rented Sector

11.8 The private rented sector (PRS) is a crucial part of the housing market, serving individuals with affordable housing needs. Median monthly rents in Tonbridge and Malling were £1,370 as of April 2025, higher than regional and national averages. Rents have increased by about 28% in the last 5 years.

11.9 There were 37 licensed and an estimated 165 unlicensed Houses in Multiple Occupation (HMOs) in the area. The small number of HMOs suggests no need for additional planning controls like Article 4 Directions.

11.10 Given growing nature of the Build-to-Rent (BTR) market, the Council may consider a policy on BTR development to define expectations, including how affordable housing policies would apply as well as standards expected from BTR development.

Overall Housing Need

11.11 This report was largely prepared in April 2025 when the Standard Method for assessing housing need indicated a need for 1,090 dwellings per annum for Tonbridge and Malling.

11.12 This was subsequently updated to 1,097 dpa in May 2025 but this was a minimal change and not considered material enough to change to the findings of this report.

11.13 Worsening affordability is a key government reason for seeking higher housing figures, as it indicates supply is not keeping pace with demand.

11.14 Delivering 1,090 dwellings per annum across the plan period to 2042 could lead to a population growth exceeding 42,500 people, triple the rate of trend based projections. The increased housing need in May 2025 of 7 dpa would only marginally increase this population growth.

11.15 This level of population growth would support up to 27,500 jobs. The report's key analysis, including housing mix and older person needs, is based on this housing delivery level.

Affordable Housing Need

11.16 There is an acute need for affordable housing throughout the Borough. Most of this need is from households unable to buy OR rent, indicating a particular need for affordable or social rented housing.

11.17 While affordable needs are high, they do not necessitate an increase in the Local Plan housing requirement. However, the Council should maximise the delivery of affordable housing at every opportunity. Social rents are more affordable and could benefit a wider range of households, thus potentially being prioritised where overall delivery is not prejudiced.

11.18 Shared Ownership is a suitable Affordable Home Ownership (AHO) product for households with marginal affordability, with no strong evidence for First Homes or discounted market housing.

11.19 The report does not provide a definitive affordable housing target, emphasising that delivery is limited by viability but should be maximised.

Need for Different Sizes of Homes

11.20 Analysis of future housing mix considers demographic changes, including family households and an aging population. Tonbridge and Malling has an above-average proportion of households with dependent children (around 32% in 2021).

11.21 The suggested size mix by tenure indicates a particular need for 2- and 3-bedroom accommodation across all sectors. For rented affordable housing, 40% of units should have at least 3 bedrooms, with 10% having 4+-bedrooms.

11.22 A flexible approach should be adopted in applying the suggested mix, considering site nature, area character, updated evidence, existing mix, turnover, and viability

Older Persons Housing Need

11.23 The older person population is projected to increase notably, with a 38% rise in those aged 65+ by 2042. This will also lead to an increase in people with disabilities, including a 51% rise in dementia and a 45% rise in mobility problems among those aged 65+.

11.24 There is a need for around 950 additional housing units with support (sheltered/retirement housing) and around 220 additional housing units with care (e.g., extra-care), primarily in the market sector. Additional nursing and residential care bedspaces (around 720) are also needed.

11.25 A clear need exists to increase the supply of accessible and adaptable dwellings (M4(2)) and wheelchair-user dwellings (M4(3)). The Council could require all dwellings (in all tenures) to meet M4(2) standards as a starting point.

11.26 Approximately 5% of market homes could meet M4(3) standards (wheelchair-user adaptable), with 10% in the affordable sector (wheelchair-accessible), applied flexibly due to viability or site circumstances.

11.27 Policies for specialist older persons accommodation must consider different use classes (C2 vs. C3), affordable housing contributions, and viability

Other Specific Groups

11.28 Custom and Self Build:

- The Council faces a current supply shortfall of 101 plots as of October 2024, increasing to 111 by October 2025 if no new permissions are granted. The Council needs to meet this backlog and the newly arising need (approximately 22 plots per base period).
- The Council should be supportive of Self and Custom Build development and could require a proportion of plots on larger schemes to be marketed for this use.

11.29 Children's Homes

- Kent County Council (KCC) aims to provide around 10 new residential homes for children with complex needs across the County, seeking to work closely with local authorities like Tonbridge and Malling to identify suitable sites. The Council should be generally supportive of new proposals for children's homes in residential areas with access to service.
- Tonbridge and Malling may adopt a policy similar to Lancaster City's, giving KCC first refusal of placements in new children's residential care homes.

11.30 Service Families

- Due to the insignificant presence of regular forces in Tonbridge and Malling (no MoD personnel in April 2024), no specific Local Plan policy is considered necessary for this group.