



Tonbridge & Malling Housing Delivery Study

Iceni Projects Limited on behalf of
Tonbridge and Malling Borough
Council
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Contents

1. Introduction.....	1
2. Housing Market Dynamics and Drivers	4
3. Profiling Recent Housing Delivery	34
4. Achieving Increased Housing Delivery Rates.....	44
5. Strategic site assessment.....	54
6. Conclusions.....	65

1. Introduction

Context

- 1.1 Tonbridge and Malling Borough Council is in the process of preparing a new Local Plan to guide development in the Borough.
- 1.2 The Government’s revisions to national planning policies in December 2024 has resulted in a substantial increase in Tonbridge and Malling’s housing need.
- 1.3 A Regulation 18 consultation on a draft Local Plan was carried out in Autumn 2022. This was prepared on the basis of a housing need for the Borough of 839 dwellings per annum (dpa) using the then Standard Method. In December 2024 the Standard Method was revised by national Government and based on the most recent housing stock and affordability data it now shows a need for 1,097 dpa in Tonbridge and Malling (the calculation for this need being shown in the table below). This is an increase of 31%.
- 1.4 Both the former and revised standard method calculations indicated housing needs well in excess of that in the most recently adopted plan, the 2007 Core Strategy, which contained a housing requirement of 425 dpa.

Table 1.1 Standard Method housing need calculation for Tonbridge and Malling

Housing Stock 2024	56,823
Step 1: Annual dwellings stock increase (0.8%)	455
Average affordability ratio (2020 – 2024)	12.44
Adjustment factor	241%
Step 2: Housing need (per annum)	1,097

- 1.5 The Council's previous Housing Market Delivery Study was published in July 2022 but does not consider the implications of the December 2024 Standard Method. The data used in that study is also now several years out of date and was prepared in a context (immediately following COVID-19) in which housing markets circumstances were different.

Study Purpose

- 1.6 In the context of the increase in the Borough's housing need, the purpose of this Housing Delivery Study is to consider housing delivery performance, provide a sound and robust evidence base to support housing policies in the Local Plan and advise on how the Local Plan might be crafted to support higher housing delivery, taking account of the changes to national policy. The emerging Plan is to cover a 2024-42 plan period.
- 1.7 More specifically, the Study objectives are to:
- Examine the scope for the housing market to deliver a 'housing market absorption rate' implied by the standard method, in order to support a deliverable Plan and consider how this can be achieved;
 - Evidence forecast 'absorption rates' taking account of both historical data and how factors which have influenced these historically may vary in the future;
 - Draw together evidence on market signals and the supply/demand dynamic for different types of homes, and the dynamics in different parts of the Borough and inter-relationships with adjoining areas;
 - Consider prospective strategic allocations and large committed sites, as well as allowances for small sites to come forward;
 - Consider how higher housing delivery could be supported, including the role of the spatial strategy and policies for the mix of homes on development schemes of different sizes/types in helping to increase housing delivery.

- 1.8 The Study is prepared in a context whereby the scale of housing provision which could be sustainably accommodated is a function of several factors including land supply and market capacity, as well as the ability to fund and deliver infrastructure necessary to support development. Broader development and infrastructure constraints may also affect the scale of housing supply and growth which can be achieved through the Local Plan. This Study does not purport to comprehensively answer all of these questions – this is the task of the plan-making process as a whole – but seeks to provide a robust evidence base to inform the ongoing work to prepare the Local Plan. This invariably will need to be further refined as the plan-making process progresses in the Borough.

Report Status and Structure

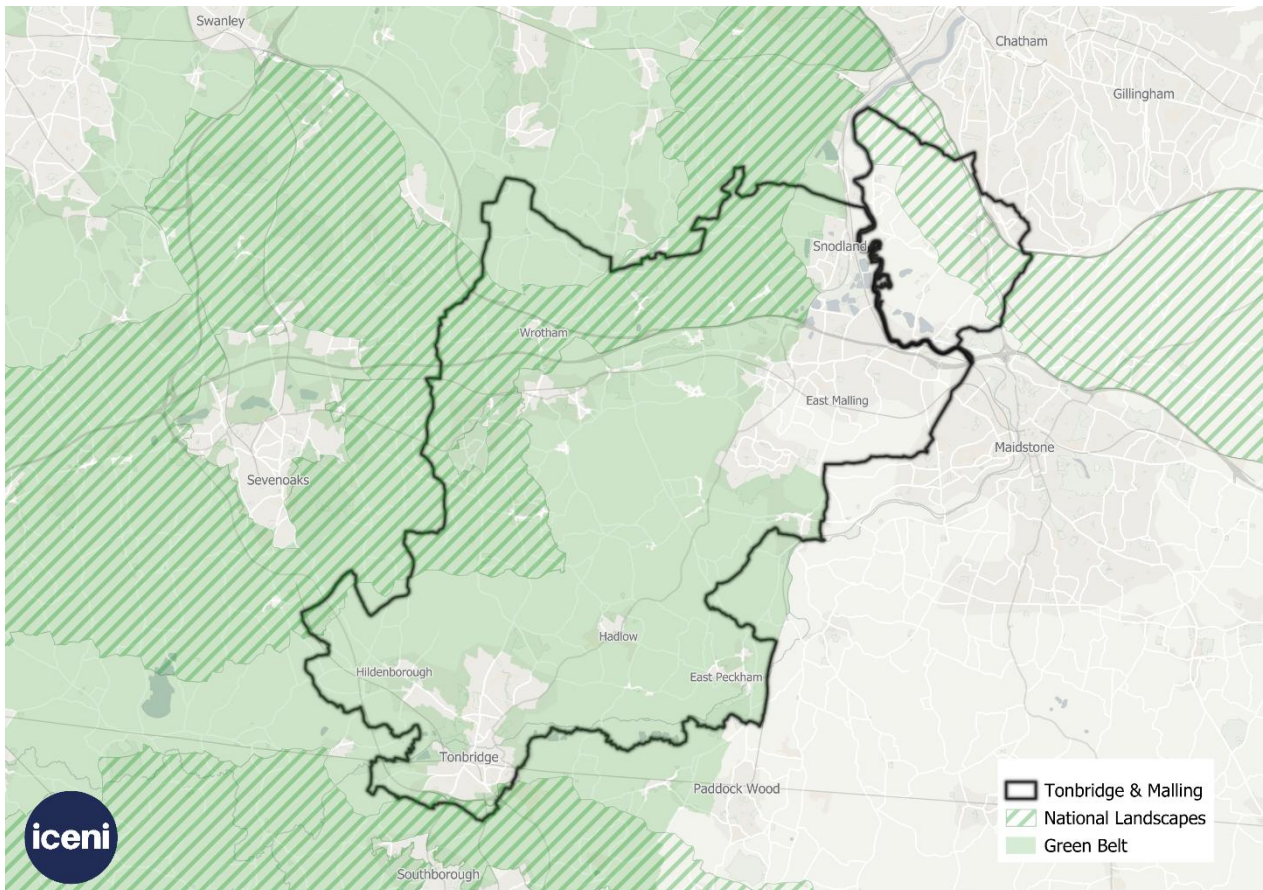
- 1.9 The remainder of the report is structured as follows:
- **Chapter 2 - Housing Market Dynamics and Drivers:** A review of trends in national and local housing markets and delivery and what this means for market capacity within Tonbridge and Malling
 - **Chapter 3 – Housing Delivery Profile:** A more detailed review of the location and nature of recent housing delivery within the Borough
 - **Chapter 4 – Considerations for a Local Housing Trajectory:** A discussion of lead-in times, build-out rates and deliverability of major sites to feed into a future Local Housing Trajectory
 - **Chapter 5 – Achieving Resilience in Local Housing Delivery:** A discussion of factors which would contribute to resilience in housing delivery rates
 - **Chapter 6 – Conclusions:** Brings together the analysis completed and provides recommendations for plan making.

2. Housing Market Dynamics and Drivers

The Borough's Geography

- 2.1 Tonbridge and Malling is located in Kent around 35 to 40 miles south-east of Central London. Its borders are close to the towns of Sevenoaks, Royal Tunbridge Wells, Maidstone and the Medway Towns which respectively therefore influence housing market dynamics in different parts of the Borough.

Figure 2.1 Tonbridge and Malling Borough



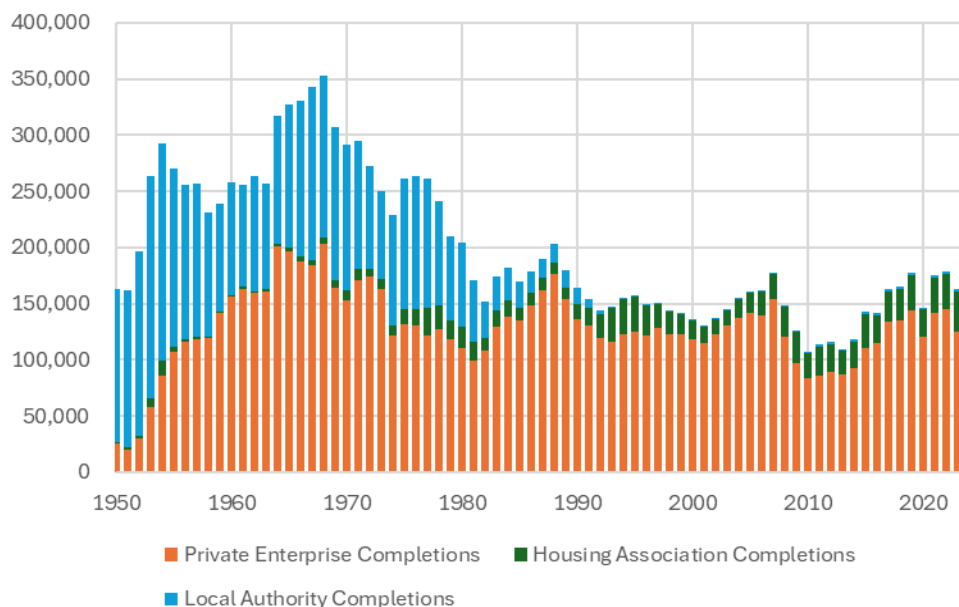
- 2.2 The main settlements are Tonbridge and the Aylesford area, with the recently developed settlement of Kings Hill between them. The authority is otherwise relatively rural in nature, with much of it covered by the Green Belt, as Figure 2.1 above shows.

- 2.3 The Kent Downs National Landscape covers part of the north-western part of the Borough. A small section of the High Weald National Landscape is located to the south of the Borough also, to the south of Tonbridge as shown in **Figure 2.1** above.

National Housing Market Dynamics

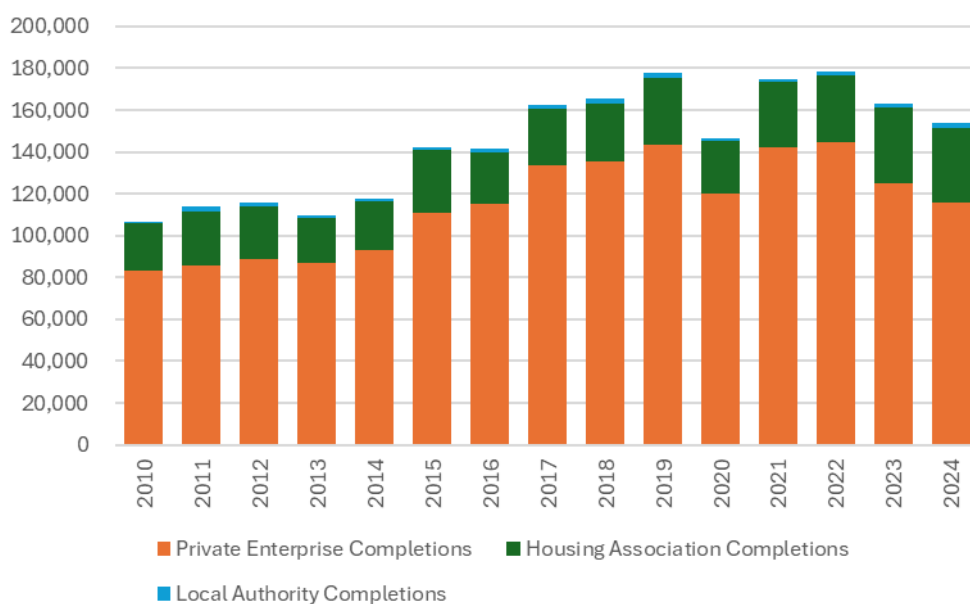
- 2.4 In this sub-section, we have sought to review national trends in housing delivery recognising that there are macro-economic factors (alongside local issues and land supply) which can influence rates of new housing development.
- 2.5 New build housing completions in England have fluctuated over time, influenced by factors including economic cycles, migration levels, land availability and government policy. As shown in the figure below, completions by the private sector have generally fallen between around 120,000 – 150,000 homes per annum. Completions only fell below this rate in the period between 2010 – 2014 where the ‘credit crunch’ impacted on mortgage availability.

Figure 2.2 New build housing completions by tenure, England



Source: MCHLG Live Table 244

- 2.6 Housing completions have historically only reached levels much higher when there has been significant affordable housing development, particularly before the 1980s when local authorities were building high numbers of homes themselves. During the 1960s and early 1970s there was also a high degree of replacement demand (i.e. housing completions replacing demolitions) arising from substantial clearance and regeneration programmes.
- 2.7 Over the more recent past, the level of housebuilding across England increased year-on-year from 2001 to a market peak in 2007/8, increasing from delivery of 129,510 homes in 2001 to 176,640 in 2007. This growth in housebuilding was supported by:
- A period of sustained economic growth;
 - Strong availability of mortgage finance;
 - Historically low interest rates; and
 - The attractiveness of housing as an investment.
- 2.8 These factors, together with an upturn in population growth rates (influenced in part by growing international migration), saw strong housing demand and an upturn in housing supply. Effective demand for housing over this period increased strongly. Whilst housing supply increased, it was unable to keep pace with the rapid growth in demand, and as a result there was strong growth in house prices in real terms and relative to incomes.
- 2.9 The market turned dramatically in 2008 as a result of the financial crisis, which was driven by issues associated with sub-prime mortgage lending (originally in the US). Housebuilding levels fell significantly and the availability of mortgage finance became more restricted (the ‘credit crunch’). The situation did not start to ease until 2013 when fluidity within financial markets started to improve, and there was Government intervention through the Help-to-Buy and the Bank of England’s Funding for Lending schemes, both of which supported a recovery in effective demand for housing for sale. This recovery, along with more recent housing development trends, is illustrated in **Figure 2.3** below.

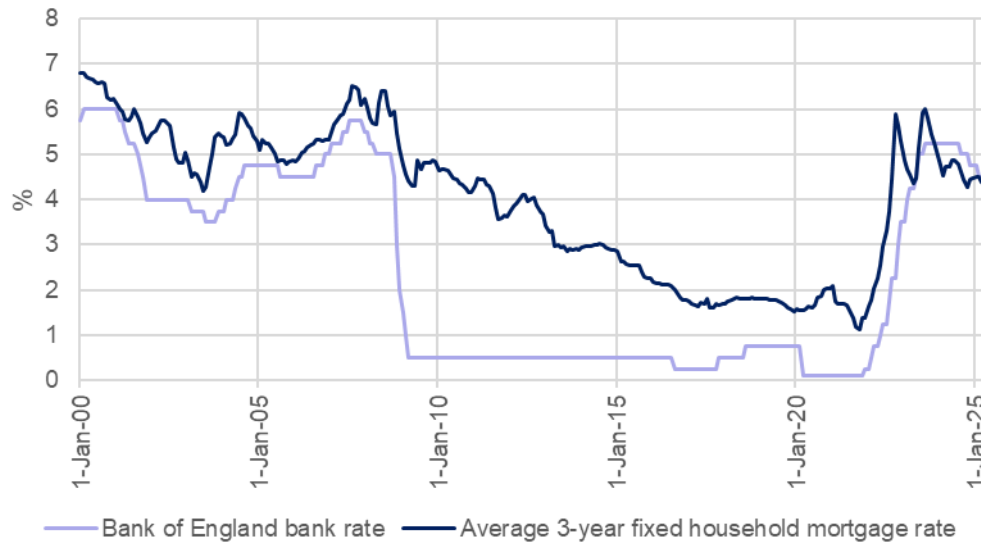
Figure 2.3 Recent new build housing completions, England

Source: MCHLG Live Table 244

- 2.10 The market is influenced by wider macro-economic stability and confidence, which was affected by the UK's decision to withdraw from the EU over the period since 2016. The Covid-19 pandemic then resulted in a temporary pausing of market activity in Spring 2020 when the Government imposed a national lockdown.
- 2.11 Covid-19 however generated a spike in housing market activity as enforced 'lockdowns' caused households' to re-evaluate their living circumstances and changing working patterns enabled growth in remote or hybrid working. Alongside this, Government introduced a 'Stamp Duty Holiday' whereby no SDLT was due on the first £500,000 of property value. This ran from July 2020 to June 2021. These factors together, resulted in a spike in effective demand for market housing. New build completions nationally reached a high point of 178,250 in 2022.
- 2.12 New build completions have fallen since 2022, with 153,900 achieved in 2024. While around 20% below the 2024 peak, this is not dissimilar to levels seen between 2015-18. The fall in completions has been driven by a decline in private sector completions, which fell to 115,750 in 2024, their lowest level since 2016. Key drivers here have been higher

interest rates (shown in **Figure 2.4** below); together with the end of the Government's Help-to-Buy scheme.

Figure 2.4 Interest rates

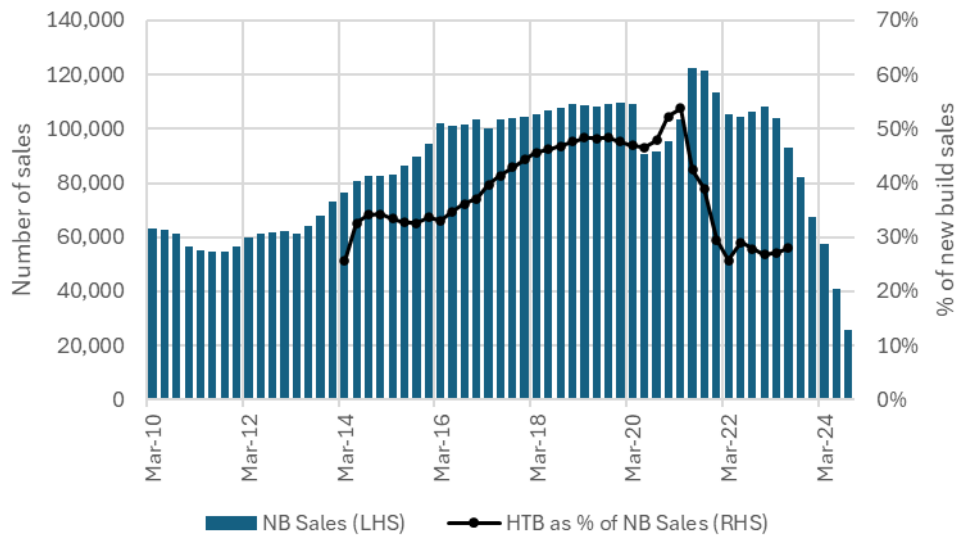


Note: The household mortgage rate shown is an average for banks and building societies on a 75% loan to value ratio

Source: Bank of England *Bank Rate*, *Quoted Household Interest Rates*

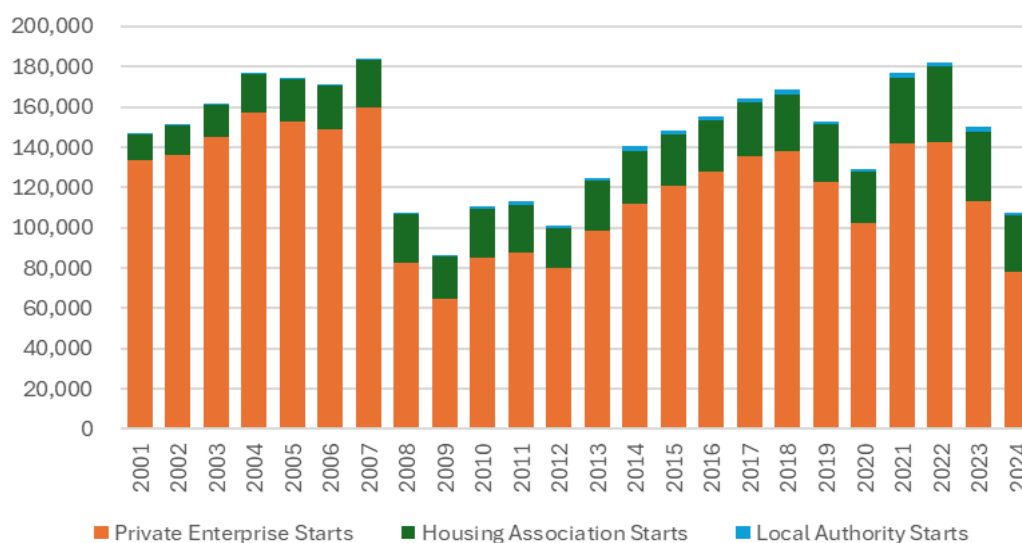
- 2.13 The Help to Buy Loan Scheme ran from 2013 until 2023 and provided low interest loans to households for the purchase of a new build home, up to a portion of their total value. This reduced the mortgage deposit required to buy a home. From 2021, the scheme was restricted to first home buyers and stricter caps on home value were introduced, which reduced the number of loans provided. It was then closed to applications in October 2022, with final completions required by March 2023.
- 2.14 From 2017 until the scheme's conclusion, help to buy loans were around 40 – 60% of new build sales in England, providing substantial support to new build housing demand. New-build sales out-performed the wider market. Sales of new-build properties have declined following the closure of the scheme.

Figure 2.5 Size of the help to buy loan scheme compared to new build sales, England



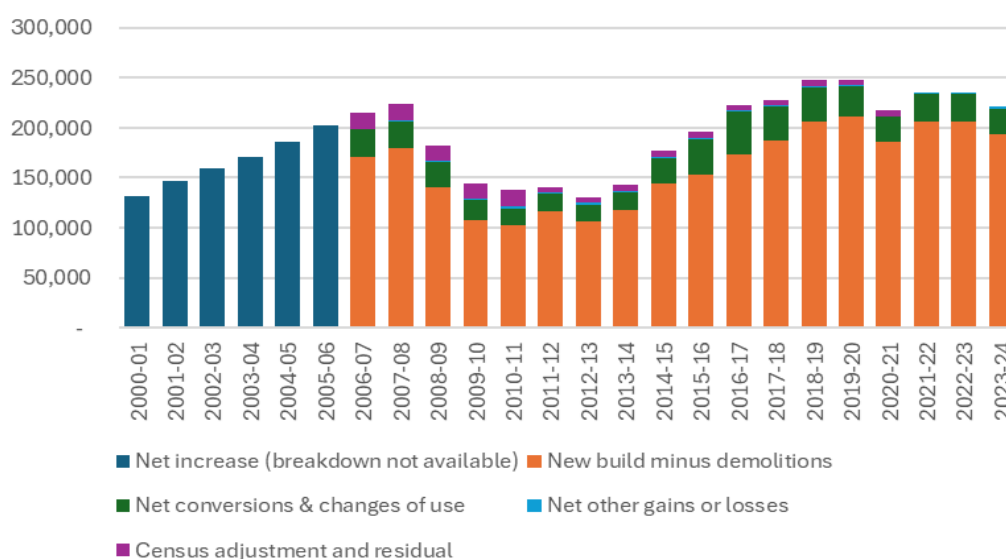
Source: Icen analysis using ONS *Residential property sales for administrative geographies*, DLUHC *Help to Buy: equity loan statistics*

- 2.15 House building in recent years has also been influenced by rapid increases in construction and labour costs since COVID-19. Together with higher interest rates (which feed through to finance costs for development), that has contributed to viability challenges on some schemes. There are other factors which have contributed to different market segments – with the impact of changing building safety standards on urban flatted schemes (and flatted markets) particularly notable.
- 2.16 These factors together have led to a dramatic drop in new build housing starts from a peak of 182,070 reached in 2022 to 107,530 in 2024 (as shown in **Figure 2.6** below). Over the available data which stretches back to 1978, lower levels of starts were only recorded in 2008, 2009 and 2012. Private enterprise starts have been the most affected, with only 78,010 starts observed in 2024. Since 1978, lower levels of private enterprise starts were only observed in 2009 shortly after the Global Financial Crisis (GFC). We are thus currently at a potential low point in a market cycle.

Figure 2.6 Recent new build housing starts, England

Source: MCHLG Live Table 244

- 2.17 Other data from MHCLG shows that net additions to housing stock in England have remained above the low points seen post-GFC between 2008-2014, with new builds making up most new stock but conversions and change of use also making a notable contribution. New build completions may drop in the short term, reflecting the recent drop in private enterprise starts. The net additions data includes conversions and changes of use of buildings and are thus higher than those for new-build housing considered above.

Figure 2.7 Net additions to housing stock, England

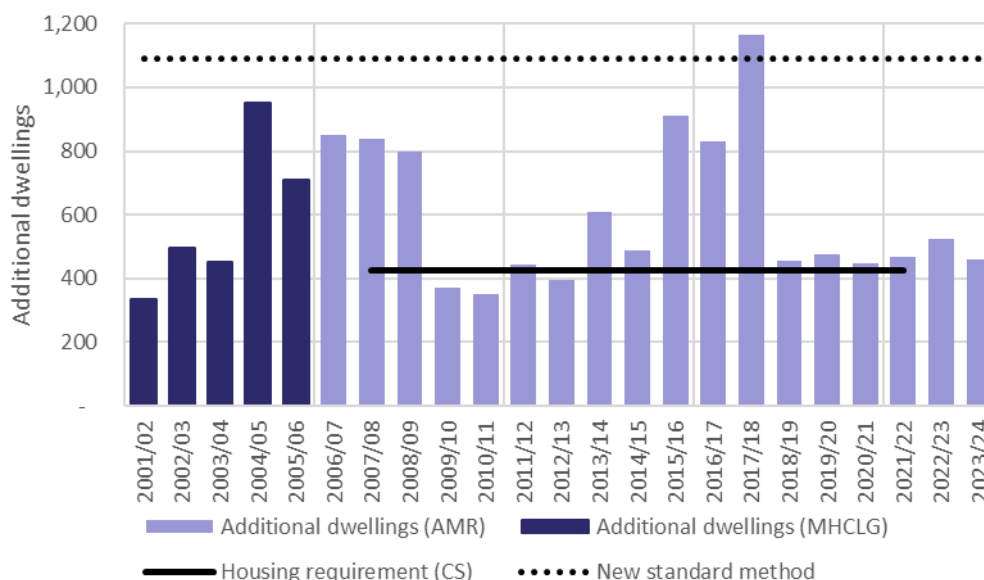
Source: MHCLG Live Table 120

Historic Housing Delivery in Tonbridge and Malling

- 2.18 We turn next to consider housing delivery trends at a local level, in Tonbridge and Malling.
- 2.19 The 2007 Tonbridge and Malling Core Strategy (CS) housing requirement was 425 dpa. Housing delivery since adoption in September 2007 has, for the most part (i.e. in 2009/10 – 2014/15 and 2018/19 onwards), been in line with the Core Strategy requirement, as shown in **Figure 2.8** below.
- 2.20 The Core Strategy requirement was however informed by the housing requirement proposed for the Borough in the draft Regional Spatial Strategy (the South East Plan).¹ This was based on a different national policy framework to that which was introduced by the NPPF in 2012 and exists now, and a context in which housing needs were not fully met by the regional plan. National policies since 2012 have placed emphasis on meeting objectively assessed housing needs. Iceni note for instance that the 2015 SHMA defined a housing need in the Borough for 648 dpa reflecting the national policy framework in place at that time.
- 2.21 There were markedly higher levels of completions in 2006/7 – 2008/9 and from 2015/16 – 2017/18 because of high delivery on strategic sites and other large sites. However the strategic sites identified in the CS have now largely been exhausted, which is to be expected given the age of the CS.

¹ The final version of the South East Plan, published in May 2009, increased this the housing requirement figure for the Borough to 450 dpa.

Figure 2.8 Housing completions compared to Core Strategy requirement



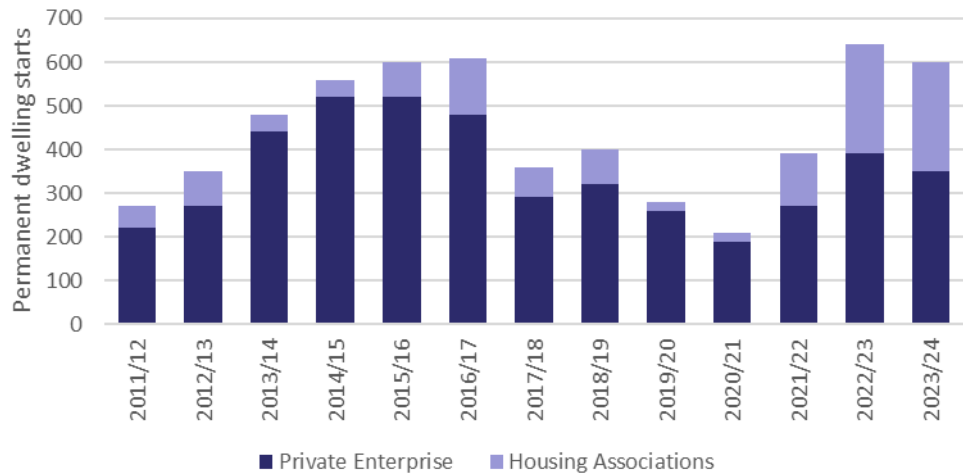
Note: 2007 Core Strategy abbreviated to CS

Source: Tonbridge & Malling AMRs, MHCLD Live Table 122

- 2.22 The current Standard Method requirement for Tonbridge & Malling of 1,097 dpa (as shown in Table 1.1). This is dramatically higher than both the CS requirement and the average historical delivery rate of 604 dpa from 2006/7 – 2023/24. Delivery of 1,097 dwellings or more has only occurred in one year over this period (2017/18), during which delivery was high on several strategic sites as well as on large and moderate-sized sites. However, the District has historically not been planning for this level of housing provision.
- 2.23 The historic housing delivery data for Tonbridge and Malling illustrates the effect of planning for a given level of housing. A higher housing target and associated pipeline of sites would have been likely to produce higher housing delivery rates, market capacity permitting (market capacity is considered in the following sections).
- 2.24 In line with the national housing market, private enterprise house starts have been relatively low in Tonbridge and Malling in recent years compared with higher delivery in the mid-2010s (as shown in the figure below). Since 2021/22, housing association starts have bolstered

overall housing delivery starts, while private enterprise starts have remained low. This will feed through into housing completions.

Figure 2.9 Housing starts in Tonbridge & Malling



Source: MCHLG Live Table 244

Stock growth rates

2.25 The Standard Method need of 1,097 dpa in Tonbridge and Malling is 1.93% of the current (2024) housing stock. The following table calculates the total housing requirement using the Standard Method over 5, 10 and 20 years.

Table 2.1 Housing stock growth rates needed to achieve Standard Method in Tonbridge and Maling

Number of years	Total housing need	% Change (from current stock)	Compound annual growth rate
5	5,486	10%	1.86%
10	10,972	19%	1.78%
20	21,944	39%	1.65%

Source: Iceni analysis

2.26 The compound annual growth rate of housing stock required to achieve the standard method depends on the length of the period considered, as set out above. A high growth rate of 1.86% per annum would be needed over the next 5 years to achieve the current standard method need, but a slightly lower 1.65% would be needed over 20 years – a

typical timeframe for a local plan. Over the proposed plan period (2024-42), the standard method figure would represent an average annual stock growth rate of 1.67%.

- 2.27 The reason that required growth rates are lower for longer periods is that a constant net addition rate (i.e. 1,097 dpa) will constitute a smaller proportion of overall stock over time as the housing stock grows.
- 2.28 Compound annual growth rates can be used to benchmark housing delivery performance against other areas. Tonbridge and Malling's historic housing stock growth rates are shown in **Figure 2.10** below, along with the average rate achieved over the last five years, the average over the available data (since 2001), and the maximum 5-year and 10-year growth rates achieved over that period.
- 2.29 Both the growth rates over the last 5 years (0.77%) and over the full period since 2001 (1.13%) are well below growth rates required in the future. Similarly, the peak 10-year growth rate achieved was 1.31% from 2001-2011. However, **Tonbridge and Malling did achieve stock growth approaching 2% per year in the mid-2000s during peak delivery of Kings Hill, with a 5-year growth rate of 1.78% from 2004 – 2009.** This is comparable to the growth rates required to achieve the Standard Method of 1,097 dpa, providing a degree of local historical precedent.

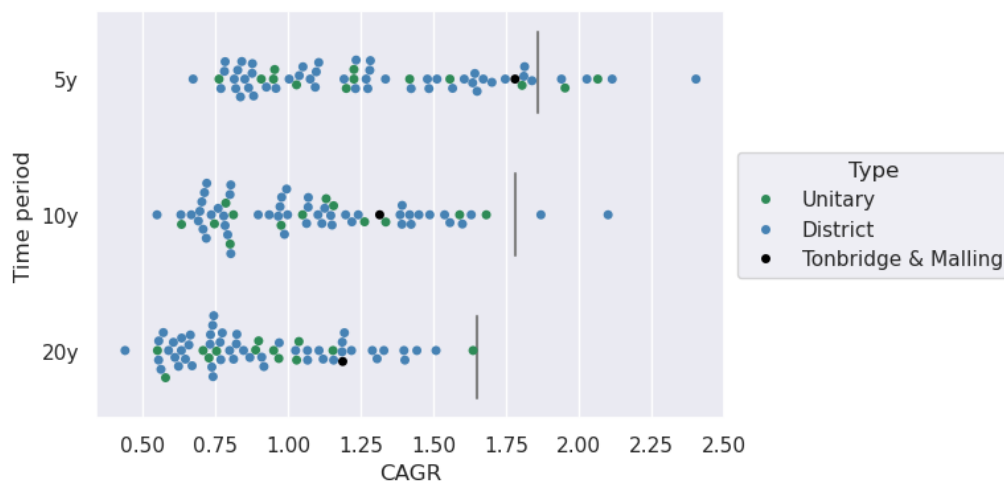
Figure 2.10 Historical housing stock growth rate in Tonbridge & Malling



Source: Iceni analysis of MCHLG Live Table 100, 122

- 2.30 The chart below compares required growth rates with the maximum rates recently achieved over 5, 10 and 20 years for other local authorities. Every local authority in the South-East of England is shown, with each represented by a single dot for each time period.

Figure 2.11 Maximum housing stock growth rates since 2001 of authorities in the South-East of England



Note: Requirements for Tonbridge and Malling under the Standard Method are shown with vertical lines

Source: Iceni analysis of MCHLG Live Table 100, 122

2.31 This analysis indicates that there are precedents for achieving the required 5-year and 10-year growth rates, and one example of an authority achieving close to the required 20-year growth rate. The vast majority of authorities have had lower rates, at least partly as a result of planning for less housing. Overall, **this analysis suggests that the required growth rates are potentially achievable albeit that they remain challenging.**

2.32 The following table provides more context on which authorities have come close to or exceeded Tonbridge and Malling's required growth rates (1.85% over 5 years, 1.78% over 10 years or 1.65% over 20 years). The ten authorities with the highest maximum 5-year growth rates are shown, with cells coloured green if they have achieved the required growth rate for Tonbridge and Malling to meet the standard method need, and light green if they have come within 0.05%.

Table 2.2 Local authorities in the South East with high maximum housing delivery rates since 2001

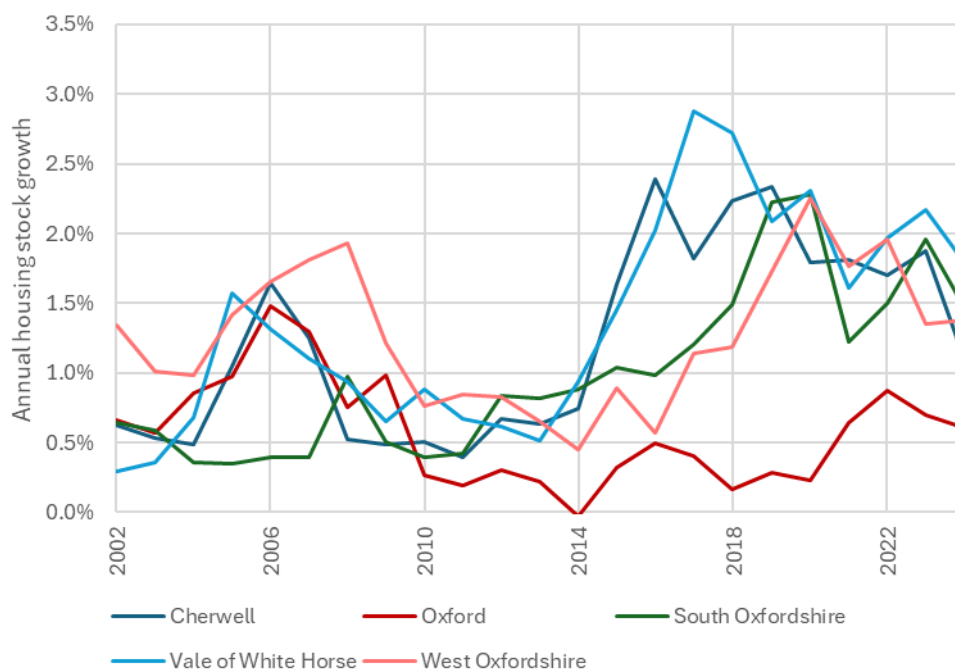
Authority	5y	10y	20y
Vale of White Horse	2.40%	2.10%	1.51%
Cherwell	2.11%	1.87%	1.33%
Wokingham	2.06%	1.59%	1.15%
Dartford	2.03%	1.63%	1.44%
Milton Keynes	1.95%	1.68%	1.64%
Maidstone	1.94%	1.60%	1.40%
South Oxfordshire	1.84%	1.54%	1.07%
West Oxfordshire	1.81%	1.42%	1.29%
Ashford	1.81%	1.49%	1.40%
Bracknell Forest	1.80%	1.33%	0.95%

Source: Iceni analysis of MCHLG Live Table 100, 122

2.33 All of the authorities in Oxfordshire around Oxford feature in this top 10. As explored below, recent housing development in these authorities illustrates the potential for ambitious local planning to secure much higher levels of housing delivery compared to historical rates.

- 2.34 The Oxfordshire SHMA in 2014 identified a substantial housing need of around 100,000 over twenty years. Local plans were put in place shortly thereafter in Cherwell and Vale of White Horse, with West Oxfordshire's Local Plan adopted in 2018 and South Oxfordshire's in 2020. Oxford also declared an unmet need given its constrained boundaries, requiring surrounding authorities to increase housing delivery rates.
- 2.35 The rapid progress with local plans in responding to the evidence is illustrated in the graph below, which has seen a rapid increase in housing delivery and significantly higher stock growth rates achieved in recent years. Housing delivery rates in each of the District Councils outside of Oxford City increased substantially from their historical positions. The Oxfordshire authorities signed a Housing and Growth Deal with Government in 2018 which provided additional support to infrastructure delivery, in return for commitments around plan-making.

Figure 2.12 Housing stock growth rates of authorities in Oxfordshire



Source: Iceni analysis of MCHLG Live Table 100, 122

- 2.36 **Table 2.2** above also includes several Kent authorities in the vicinity of Tonbridge and Malling. Dartford, Maidstone and Ashford each appear and achieved maximum 5-year growth rates higher than 1.8% pa.

- 2.37 Of these, Maidstone is directly adjacent to Tonbridge and Malling and will have considerable housing market overlap with parts of Tonbridge and Malling. Similarly to the Oxfordshire examples outlined above, Maidstone has seen a considerable increase in housing delivery following the adoption of its 2017 Local Plan, which included a higher housing target and robust supply of sites. In the six years from 2016 to 2022, Maidstone averaged delivery of 1,380 dpa, compared to 669 dpa from 2008-2016.
- 2.38 The analysis in this section has established a variety of precedents for housing delivery rates at or above those required by Tonbridge and Malling, with examples in Kent particularly apposite.
- 2.39 The national context is one in which the Government's ambition is to increase housing delivery to levels not seen in recent decades, delivering 1.5 million homes over the course of this parliament – which is equivalent to 300,000 homes per annum. This is intended to be a challenging target, and the challenging figures in the revised standard method align to this. In this context we foresee little potential for the Council to persuade an Inspector that it should be planning for a lower level of housing provision.
- 2.40 Historical evidence of housing delivery in the Borough has evidently been influenced by past planning policies, which have been planning for much lower levels of housing provision. The evidence indicates that there has been a lack of an up-to-date Local Plan for a number of years, which has restricted housing supply. Whilst some sites have come forward in the Borough, which have not been allocated in local plans in recent years, national Green Belt policies have restricted the scale of housing delivery in much of the Borough. In these terms, little weight can be given to past housing delivery performance in Tonbridge and Malling in considering what future housing delivery could be.
- 2.41 Drawing together examples from elsewhere, the evidence shows examples, including in Kent, of areas planning for and then delivering significant increases in housing delivery. However, it also shows

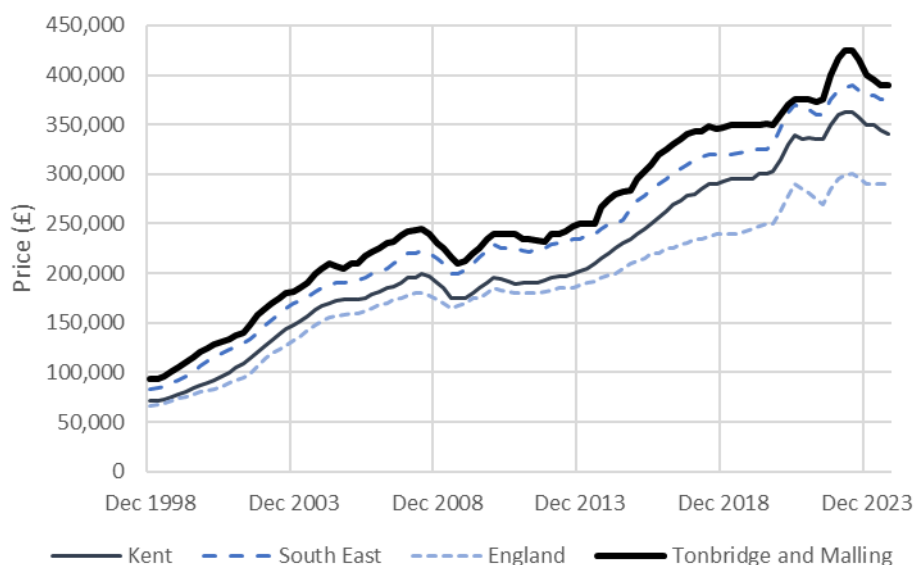
challenges to sustaining the rate of growth implied by the standard method over the longer-term (across and economic cycle) – which emphasises the need for the local plan to consider carefully how its supply is structured to take account of different local markets – both geographically and in terms of different housing products.

Housing Sales Market

Median prices

- 2.42 House prices in Tonbridge and Malling have consistently been higher than those in Kent, the South East and England as a whole, as illustrated in **Figure 2.13** below. The median house price in Tonbridge and Malling in the year ending September 2024 was £390,000, higher than the South East (£375,000), Kent (£340,000) or England (£289,995). Prices in Tonbridge and Malling have grown over time largely in line with trends in the broader market areas, apart from a sharper correction since the start of 2023 (as shown in **Figure 2.13** below). Overall, higher house prices tend to point to strong housing market fundamentals and strong demand.

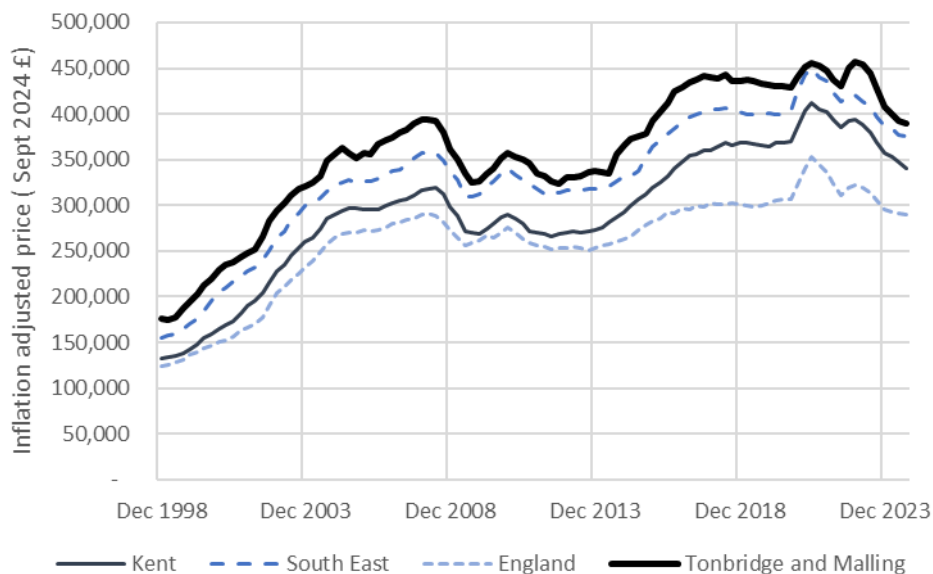
Figure 2.13 Median house prices in Tonbridge & Malling and comparator areas



Source: ONS Median house price data

- 2.43 The behaviour of house prices is in large part attributable to demand drivers across the broader economy. House prices grew strongly between 2001-5 before a relatively flat period from 2005 until late 2013, during which interest rates were higher and the after-effects of the GFC were felt. Rising mortgage availability and the help-to-buy scheme corresponded with a recovery in prices following this, with a particular spike during the stamp duty holiday in 2021 and 2022. Prices have declined slightly since 2022, influenced by higher interest rates.
- 2.44 In real terms, median house prices in Tonbridge and Malling have been more flat; and have indeed been falling since the end of 2022 because of recent high inflation. Since 2021, inflation-adjusted prices have been moving towards typical levels seen from 2004 – 2015 of between £320,000 - £380,000 (in September 2024 pounds).

Figure 2.14 Median house prices adjusted for inflation

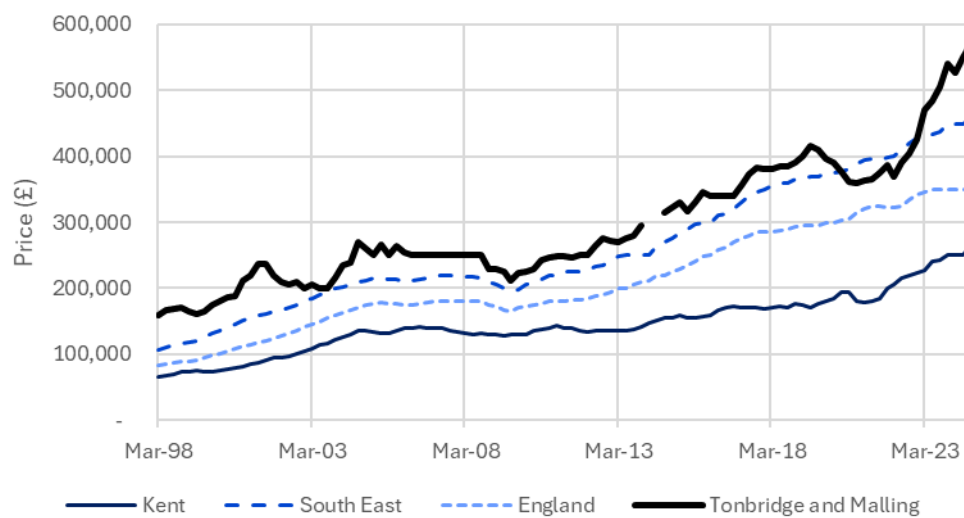


Source: Icen analysis of ONS Median House Price Data and ONS Consumer Price Index

- 2.45 Median new-build house prices for Tonbridge and Malling have been more stable over time than prices for all dwellings (as shown in **Figure 2.15** below). They have seen a dramatic rise since the start of 2022, which has also been seen to a lesser degree in Kent although not in the South East or England. This is likely to reflect a short-term shift in the profile of housing delivered locally.

- 2.46 It is notable that new-build prices in Tonbridge and Malling, as well as comparator areas, have remained steady or continued to grow since 2022. This is in contrast to the correction in overall median prices. The median new-build housing price is also higher than the median price for all housing (£570,000 vs £390,000 in the year to September 2024), as is to be expected.

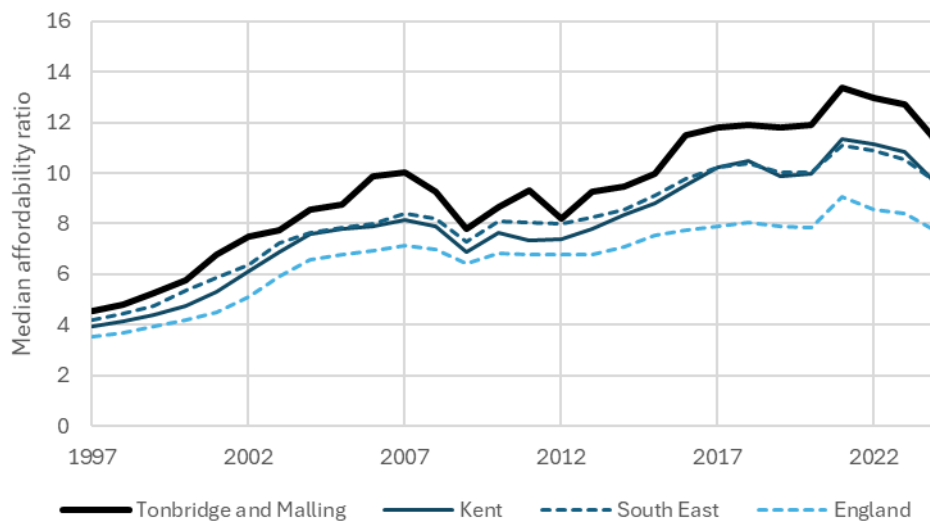
Figure 2.15 Median new build housing prices



Source: ONS Median House Price Data

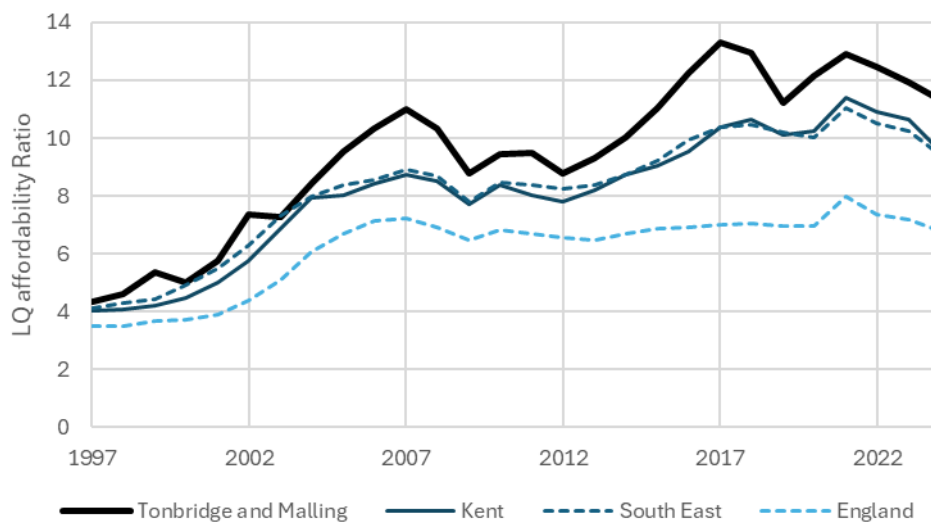
Affordability

- 2.47 It is important to note that while house prices have been falling in real terms, housing remains unaffordable. This is illustrated by the affordability ratio, which compares median workplace incomes to median house prices and is shown in **Figure 2.16** below.
- 2.48 Tonbridge and Malling's affordability ratio decreased from a peak of 13.36 in 2021 to 11.23 in 2024 (a 16% drop), set against a 14% drop in inflation-adjusted prices from the June 2021 to September 2024 quarters. In broad terms, the figures are similar. Despite the recent drop, the affordability ratio remains relatively high, being well above the levels for Kent, the South East and England as a whole. It is also still above longer-term historical levels.

Figure 2.16 Median workplace-based affordability ratio

Source: ONS *House price to workplace-based earnings ratio*

- 2.49 The lower-quartile (LQ) affordability ratio compares lower-quartile workplace incomes and house prices and so provides a better indication of the affordability of housing to purchase to those on lower incomes than the median ratio. The LQ affordability ratio for Tonbridge and Malling is shown in **Figure 2.17** below.
- 2.50 Similarly to the median ratio, the LQ ratio for Tonbridge and Malling increased from 2012, and despite a drop from 2021 to 2024 remains at high levels.
- 2.51 The median and LQ affordability ratios indicate that houses in Tonbridge and Malling are around 12 times typical annual incomes. This indicates stronger relative demand and a need for higher housing delivery to improve affordability, and a relatively high-demand housing market in which higher build-out rates (all other factors being equal) may be able to be sustained.

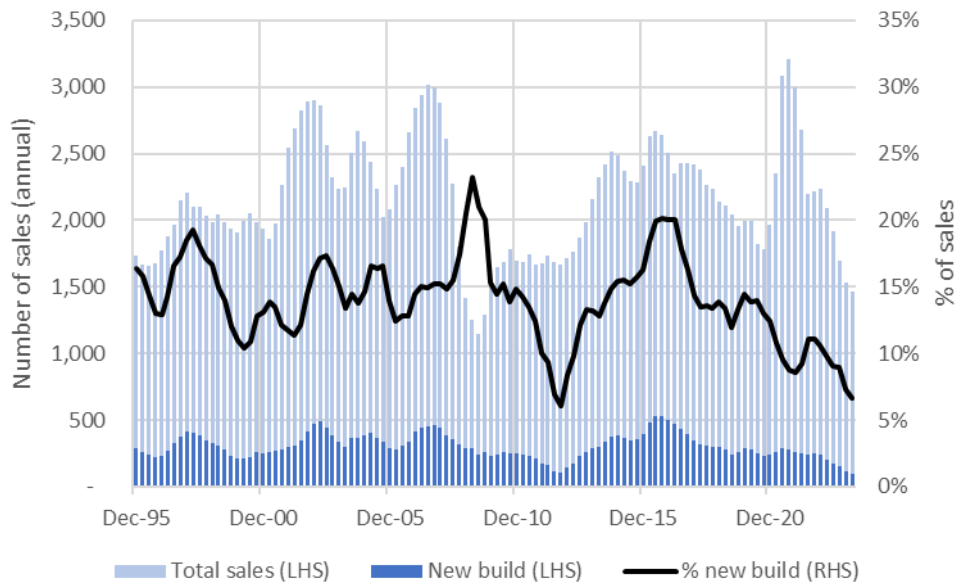
Figure 2.17 Lower quartile workplace-based affordability ratio

Source: ONS *House price to workplace-based earnings ratio*

Number of sales

- 2.52 The number of new build sales compared to the total number of housing sales is an indicator of how the amount of new build housing is tracking against the overall housing market.
- 2.53 Historically new build sales have made up roughly 10% - 20% of all sales in Tonbridge and Malling, with an average level of around 15%, as illustrated in **Figure 2.18** below. There was a spike in this percentage around 2009 as the total number of sales dropped, and then a trough after this as new build sales responded following the GFC (noting a lag between market cycle shifts and the response of new build completions).
- 2.54 Following a high period in local delivery around 2016, the number of new build sales and their proportion of all sales have been dropping. The number of overall sales has also been dropping sharply since a peak in September 2021 (the quarter in which the Stamp Duty holiday finished) and are now heading towards post-GFC levels.

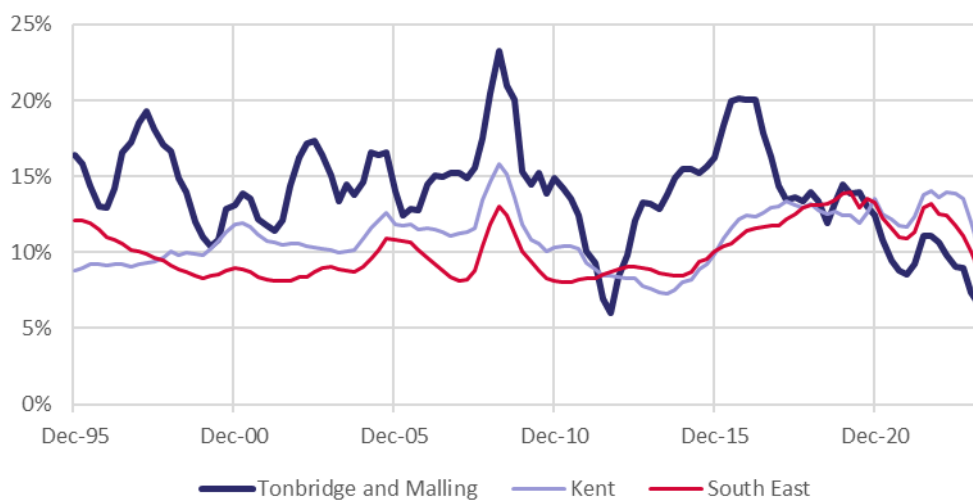
Figure 2.18 New build sales as a proportion of total sales in Tonbridge and Malling



Source: IcenI analysis of ONS *Residential property sales for administrative geographies*

- 2.55 The following figure compares the new build sales percentage in Tonbridge and Malling to benchmark areas. Historically (i.e. before 2018), Tonbridge and Malling performed above regional benchmarks. However, with the more recent drop in the new build sales proportion, Tonbridge and Malling is now below benchmark values.

Figure 2.19 Tonbridge and Malling percentage of housing sales that are new builds compared to benchmarks



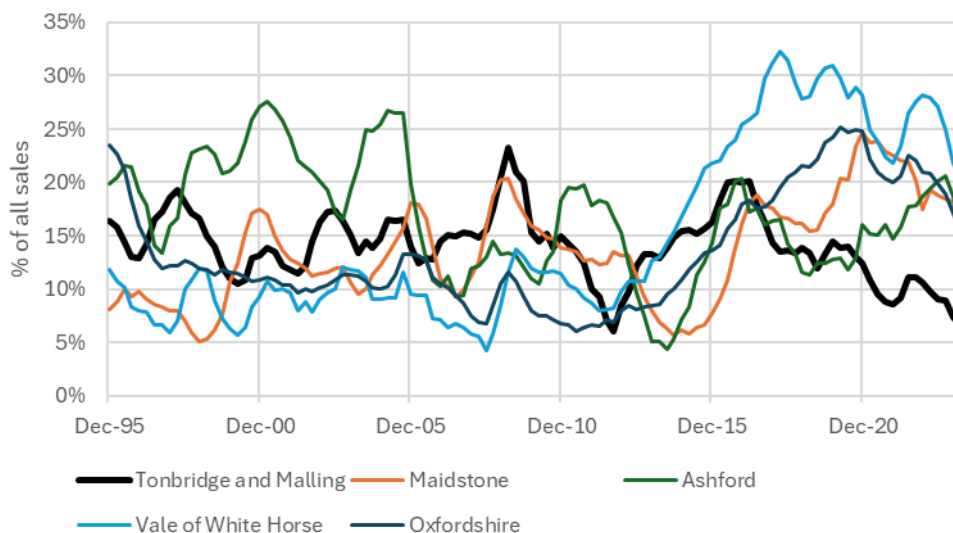
Source: IcenI analysis of ONS *Residential property sales for administrative geographies*

2.56 **Figure 2.20** below compares the new build delivery rate in Tonbridge and Malling to authorities that (as discussed earlier in this chapter) have had high housing stock growth rates over the last 20 years:

- **Oxfordshire**, which has seen high rates of housing delivery since around 2016, has been seeing new builds making up 20 – 25% of sales, with Vale of White Horse reaching 25 – 30%.
- **Maidstone** has seen high growth in recent years, with new builds making up 15 – 25% of sales.
- **Ashford** had higher housing stock growth in the early 2000s driven by its status as a designated growth area and by infrastructure investment. During this period new builds commonly made up 20 – 28% of sales.

2.57 There is substantial headroom between current (and recent) new build sales percentages in Tonbridge and Malling and the percentages in these high-growth areas. These high-growth authorities also demonstrate how new build sales percentages can increase beyond historical levels if the right planning, land supply and infrastructure investment is in place.

Figure 2.20 Percentage of sales that are new builds in selected high-growth local authorities compared to Tonbridge and Malling



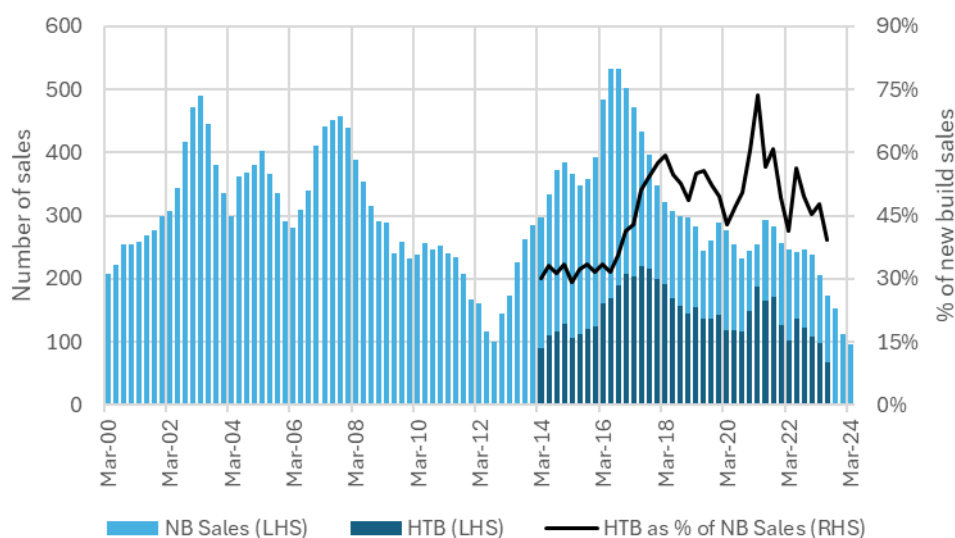
Source: IcenI analysis of ONS Residential property sales for administrative geographies

- 2.58 The recent drop in the new build sales percentage in Tonbridge and Malling, and the fact that it now sits below regional benchmarks, **clearly indicates the scope for a higher new build delivery rate in Tonbridge and Malling than achieved in recent years.** This is bolstered by the examples of higher new build sales percentages achieved in other authorities.

Help to buy

- 2.59 The Help to Buy Equity (HTB) Loan Scheme provided a low-interest loan from the government for a portion of the purchase price of a new build house. It operated from April 2013 until March 2023 (with applications closing in October 2022) and was restricted to first home buyers from April 2021. This section considers how the scheme has influenced local housing delivery rates.
- 2.60 The scale of the help to buy scheme in Tonbridge & Malling is shown in the following figure, which compares the number of HTB loans to the total number of new build sales.

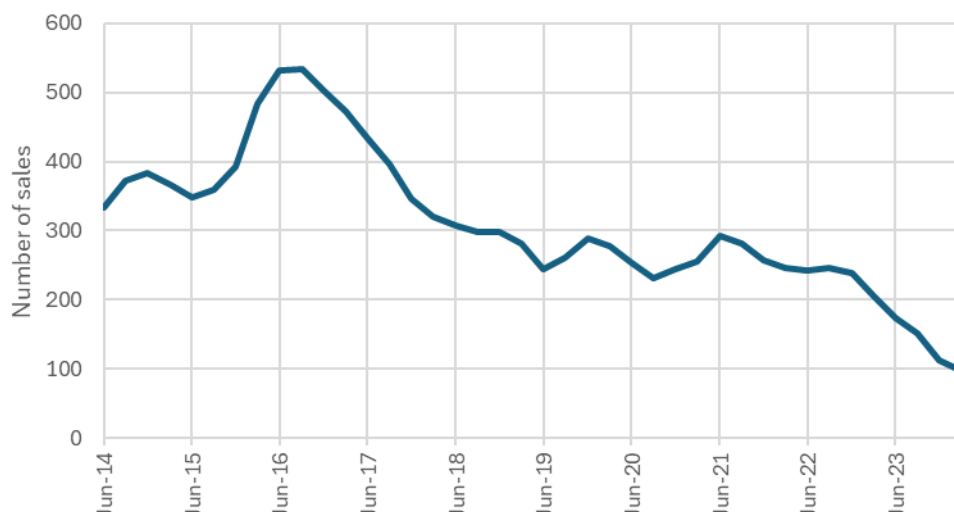
Figure 2.21 Help to buy loans as a proportion of all new build sales, Tonbridge & Malling



Source: IcenI analysis of ONS *Residential property sales for administrative geographies*, DLUHC *Help to Buy: equity loan statistics*

- 2.61 When the scheme started it supported around 30% of new build sales made. This increased to between 45% - 60% from 2016 onwards. The restriction to first home buyers and introduction of regional price caps (£437,600 in the South East) in April 2021 does not appear to have had a substantial impact on the proportion of sales supported.
- 2.62 The ramp-up in HTB loans from early 2016 onwards may have had an impact on the achievement of record numbers of new build sales in Tonbridge and Malling during 2016 and 2017. However, the overall evidence for the impact of HTB is mixed, with the number of new build sales dropping despite the proportion supported by HTB remaining high until 2024. Additionally, as illustrated in **Figure 2.21** above and **Figure 2.22** below, the recent drop in new build sales appears to be a continuation of existing trends rather than directly attributable to the cessation of help to buy (as might be expected if HTB was strongly linked to local sales rates). High new build sales rates were also achieved in the 2000s prior to the GFC and without HTB or similar support.
- 2.63 As a result of this analysis, it is unclear exactly what role help to buy has had in securing local new build sales rates. On the basis of historical data, it appears possible that higher sales rates than achieved since 2018 may be possible even without HTB.

Figure 2.22 Number of new build sales in Tonbridge and Malling

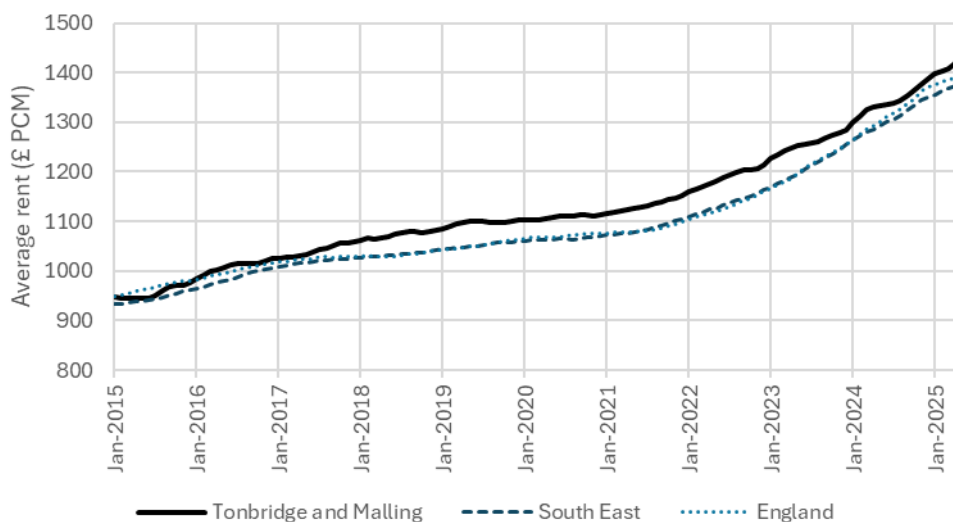


Source: ONS *Residential property sales for administrative geographies*

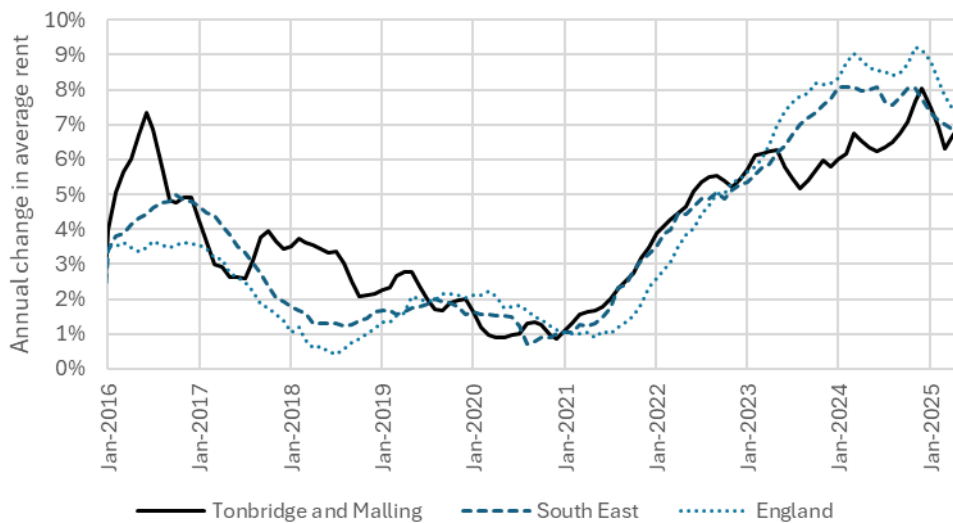
Rental Market

- 2.64 As of May 2025, average private market rents in Tonbridge and Malling sat at £1,426 per calendar month (PCM), higher than that for the South East (£1,377), and for England as a whole (£1,394). By comparison, average rents in Tonbridge and Malling were only £947 PCM in January 2015.
- 2.65 There has been a rapid increase in private sector rents in recent years, as shown in **Figure 2.23** and **Figure 2.24** below – indicative of supply/demand imbalance. Annual rental growth rates in Tonbridge and Malling fluctuated between around 1% - 4% from 2017 until the end of 2021, after a period of high rental growth during 2016. More recently, annual growth rates have escalated to around 6 – 8%. While rental growth in Tonbridge and Malling was slightly below that seen in the South East and England during 2023 and 2024, it has not dropped in recent months, unlike regional and national growth rates.

Figure 2.23 Average private housing rents



Source: ONS *Price Index of Private Rents*

Figure 2.24 Private rent growth rate

Source: ONS Price Index of Private Rents

2.66 There are several reasons for this rapid recent rise in rents across Tonbridge and Malling as well as England more broadly. Rental demand has outstripped supply, with real estate agents reporting rental housing withdrawn from the market while migration rates have been high. Rightmove estimate that there are 12 enquiries per rental property in Great Britain, up from an average of 5 over the first three months of 2019 but down from 16 at the start of 2024².

2.67 **Increased rents and a shortfall in rental supply increase the need for additional rental supply to improve affordability and availability.** These factors are also likely to make purpose-built rental housing more competitive. In this context, the Build-to-Rent sector has contributed little to housing supply historically; but could evidently do more.

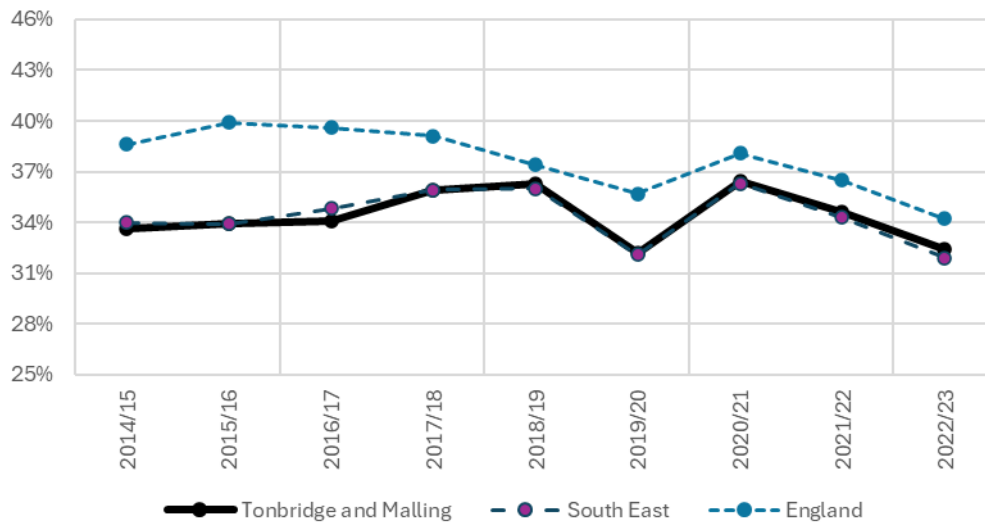
Rental affordability

2.68 The ONS estimate that in 2022/23 (the most recent data), average rents in Tonbridge and Malling were 32.4% of the median household income. As shown in **Figure 2.25** below, this proportion has not changed substantially since 2014/15, and Tonbridge and Malling is less

² Right Move Rental Price Tracker and Rental Trends Tracker Q1 2025

affordable than the England-wide average (although similarly affordable to the South-East average).

Figure 2.25 Average rents as a proportion of median household incomes



Source: ONS *Private rental affordability, England and Wales*

- 2.69 A general rule of thumb for rental affordability is that rents should not be more than 30% of gross household income. Typical rents in Tonbridge and Malling site above this threshold, suggesting that rental prices will be unaffordable for many households with typical or lower incomes or who need to rent larger dwellings.
- 2.70 This data may not capture the full extent of rental unaffordability, as rents have continued to increase markedly since 2022/23 while more recent rental affordability data is not available.

Estate and Letting Agent Engagement

- 2.71 Iceni have engaged with sales and lettings agents in Tonbridge and Malling regarding the performance of the local market. We set out below a commentary on market dynamics at the time of preparation of this report in Summer 2025.

- 2.72 House prices have grown annually in the Borough but are still below post pandemic peaks. The number of sales has also increased from last year.
- 2.73 Agents estimate a typical profile of buyers at the time of writing as follows: 25% are couples, 30% families, 10% downsizers, 20% first time buyers and 15% investors. First time buyers are experiencing affordability issues due to higher interest rates. Flats and new builds are popular amongst first time buyers.
- 2.74 The percentage of local buyers to those moving from further afield is expected to be around 55-65% to 45-35%. Many are migrating from London to access more affordable homes and larger family homes.
- 2.75 The most desired properties are terraced and semi-detached houses and these remain the best sellers. Tonbridge town, West Malling & Snodland are popular areas due to their accessibility (by rail and road).
- 2.76 New builds are often priced higher than resale properties but are still popular amongst a range of buyers, especially couples. The increased affordability issues for FTB due to higher interest rates and the end of the help to buy scheme has reflected in the sales.
- 2.77 Engagement with local agents, along with desktop research of listings, has been used to profile variation in rents across the Borough. Typical rents for different sizes of home are shown in the table below, with blank cells where there is limited information.
- 2.78 Tonbridge attracts relatively high prices and good demand, with rental stock across a variety of sizes. There are many new-build units in the central area which have a typically younger demographic. Moderate rents are achieved in Kings Hill, with slightly lower rents in the established areas around Aylesford and Snodland in particular. Newer dwellings in new-build schemes like Holborough Quarry attract very high rents, while there is a limited rental supply, and in some cases very high values, in rural areas.

Table 2.3 Typical rents observed in different parts of Tonbridge and Malling

Beds	1	2	3	4
Tonbridge	£1,100 - £1,300	£1,500 - £1,800	£1,750 - £2,200	£2,400 - £3,000
Kings Hill		£1,400 - £1,700	£1,700 - £2,000	£1,900 - £2,500
Aylesford			£1,750 - £2,050	£1,900 - £2,100
Snodland (exc. Holborough Quarry)			£1,100 - £1,300	
Holborough Quarry				£2,000 - £2,500
Rural areas				£3,000 - £5,000

Source: Estate agent engagement and Icen review of listings on Rightmove.co.uk

Affordable Housing Dynamics

- 2.79 The emerging evidence points to a notable need for affordable housing in the Borough, with a need for 647 affordable homes per year with a need in all parts of the Borough. It also illustrates the pressures which the Council is facing in meeting this need, with approaching 150 households housed in temporary accommodation.
- 2.80 In these terms, increased affordable housing provision through either policy mechanisms (such as higher delivery on Green Belt sites) or through enhanced public funding (taking account of the £39 billion investment in affordable housing over 10 years announced in the Spending Review 2025) clearly provides the potential to support increased housing delivery overall.

Implications

- 2.81 There is likely to be a dip in completions nationally in the short-term due to the recent dip in commencements, which results in part from current poor housing viability. However, interest rates are coming down and

inflation and supply chain issues have eased since COVID-19, and so housing delivery nationally may improve in the medium to longer term.

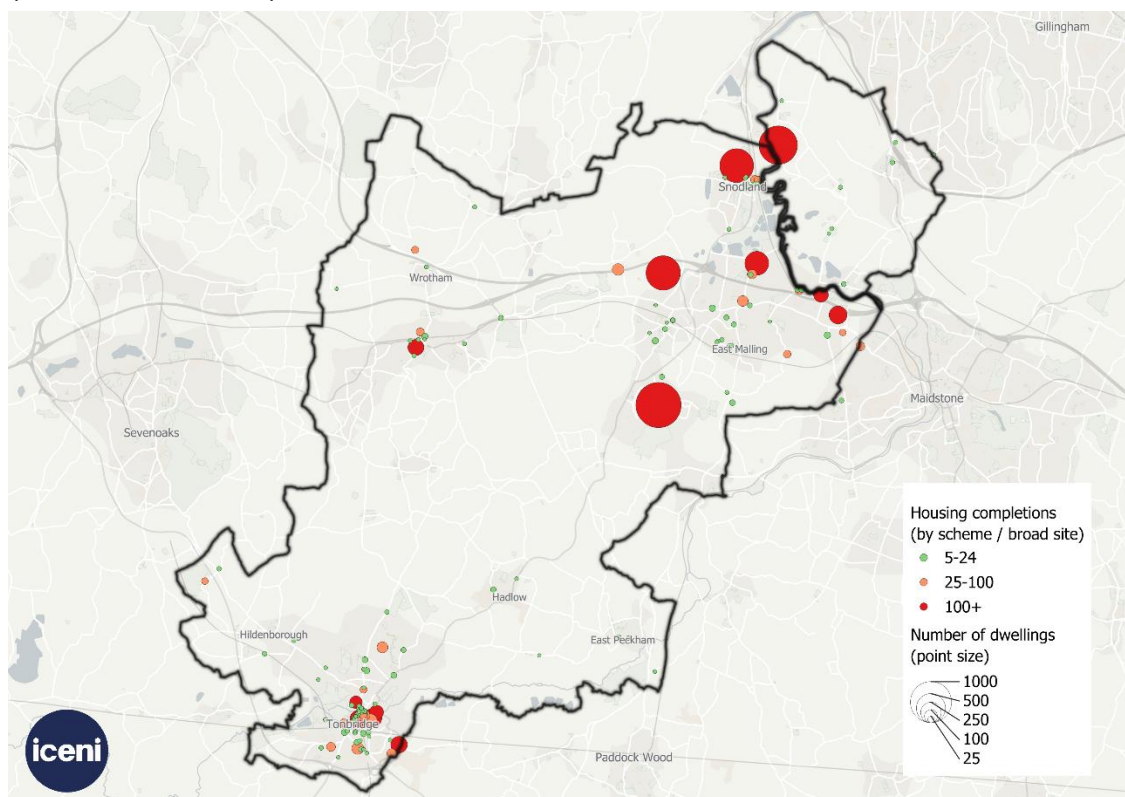
- 2.82 The local housing market in Tonbridge and Malling has largely tracked the broader housing market. While there has been a recent correction in house prices, they remain high and above the long-term position on an inflation-adjusted basis. Low affordability for the rent and purchase of housing underlines the ongoing need to increase housing delivery. Affordability ratios, rents and house prices suggest that Tonbridge and Malling has a relatively high-pressure housing market in which higher housing delivery rates should be able to be achieved.
- 2.83 The evidence (in this and the next section) shows that to achieve, and in particular to sustain the higher housing delivery implied by the standard method across the economic cycle, the Council would be advised to consider how it builds realism and resilience into its housing trajectory through providing a greater breadth of housing provision – both spatially and in terms of products.

3. Profiling Recent Housing Delivery

Location of development

- 3.1 The following figure shows completed housing by scheme location and size since 2006/7.

Figure 3.1 Locations with completed housing in Tonbridge and Malling (2006/7 – 2023/24)



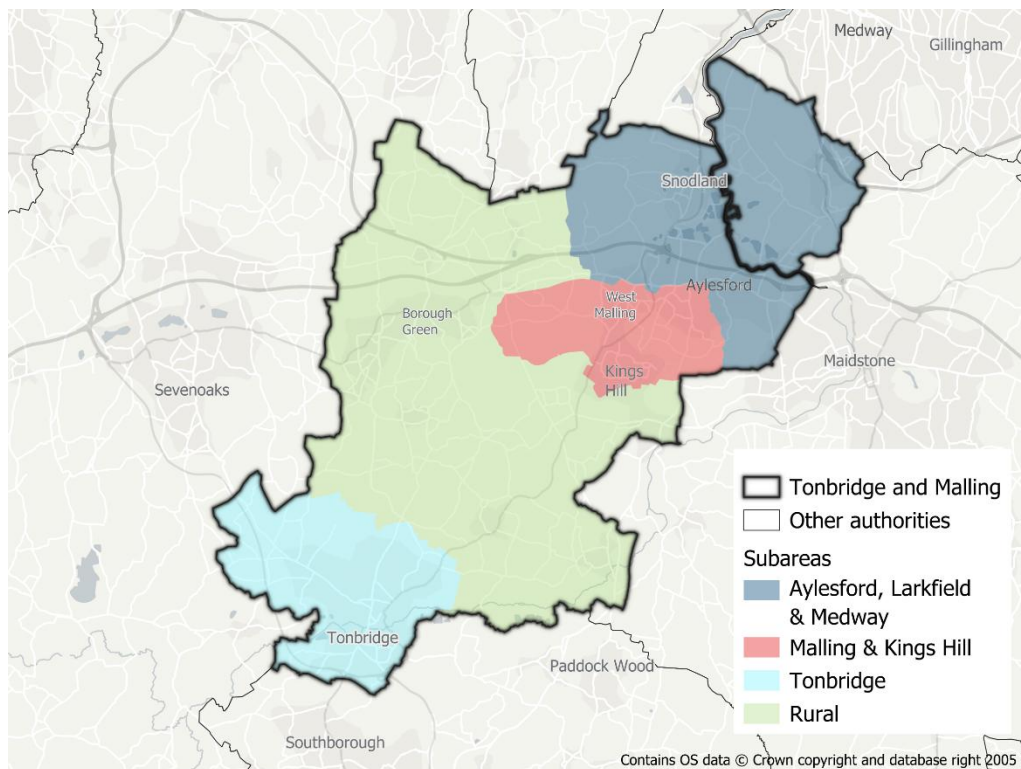
Source: Icen analysis of Council data

- 3.2 By far the largest schemes during this period have been Peters Pit, Holborough Quarry, Leybourne Grange and Kings Hill. Each of these has delivered more than 700 homes (Kings Hill substantially more), and all are located in the north-eastern part of the Borough.
- 3.3 There have been several large sites that have delivered flatted schemes in Central Tonbridge. There are also a small number of other major 100+ home sites otherwise included at Isles Quarry, the Frantschach Site, Preston Hill and the former Somerfield Distribution

Centre. Again, most of the larger schemes delivered have been located in the north-eastern part of the Borough, with a secondary cluster around Central Tonbridge.

- 3.4 A variety of sites that have delivered smaller schemes are located throughout the Borough, principally around Tonbridge, Aylesford and East and West Malling, with a smaller number around Borough Green.
- 3.5 To provide a more detailed breakdown of the location of development, the Borough has been divided into four subareas: Aylesford, Larkfield & Medway; Malling & Kings Hill; Tonbridge; and Rural. These are shown in the figure below and are a grouping of the subareas used in the Tonbridge and Malling Housing Need Study.

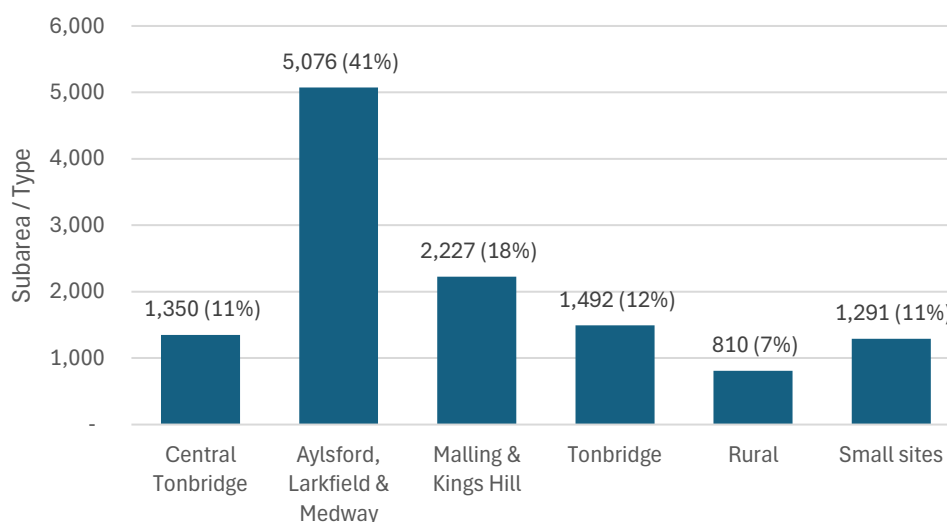
Figure 3.2 Subareas within Tonbridge and Malling



- 3.6 These subareas reflect potential submarkets within the Borough. Malling & Kings Hill has been separated from Aylesford, Larkfield & Medway because it has a higher median house price. However, these areas are close together and both are located in the north-eastern part of the Borough near Maidstone, and so there is likely to be considerable overlap in their housing markets.

- 3.7 Tonbridge sits at the other end of the Borough, with the rural area between it and the north-eastern subareas. In the following analysis development in Central Tonbridge has been recorded separately, as this is predominately flatted schemes which are likely serving a somewhat distinct submarket to greenfield release and lower-density housing development elsewhere.
- 3.8 As illustrated in the figure below, most (60%) recent housing completions have been in Aylesford, Larkfield & Medway or in Malling & Kings Hill. If small sites are excluded as their location has not been analysed, this proportion increases to two-thirds (67%). Outside of Central Tonbridge, Tonbridge makes up only a small proportion of housing development, as does the Rural Area.

Figure 3.3 Housing completions by subarea since 2006/7

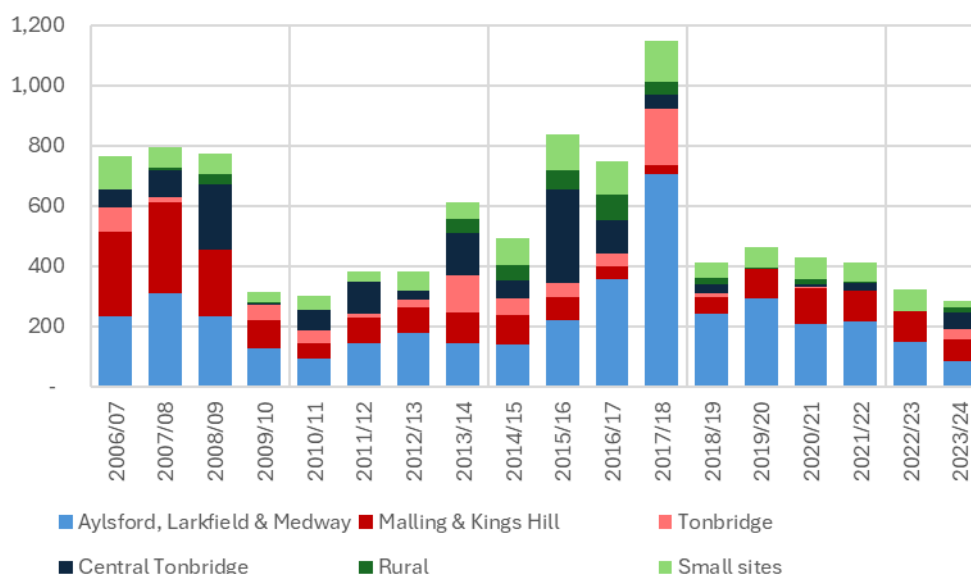


Source: Iceni analysis of Council data

- 3.9 The following figure breaks these results down over time. This analysis illustrates that:
- **Aylesford, Larkfield & Medway and Kings Hill have formed the bulk of completed housing in most years**, supplemented by completions in Central Tonbridge in years with high overall delivery.
 - **Delivery in Tonbridge and the Rural area has been more variable, and has generally been relatively low.**

- **Small sites have made a modest but relatively constant contribution to overall housing supply.**
- **Indeed, there has been limited development in Central Tonbridge, Tonbridge and the Rural Area since 2018/19.**

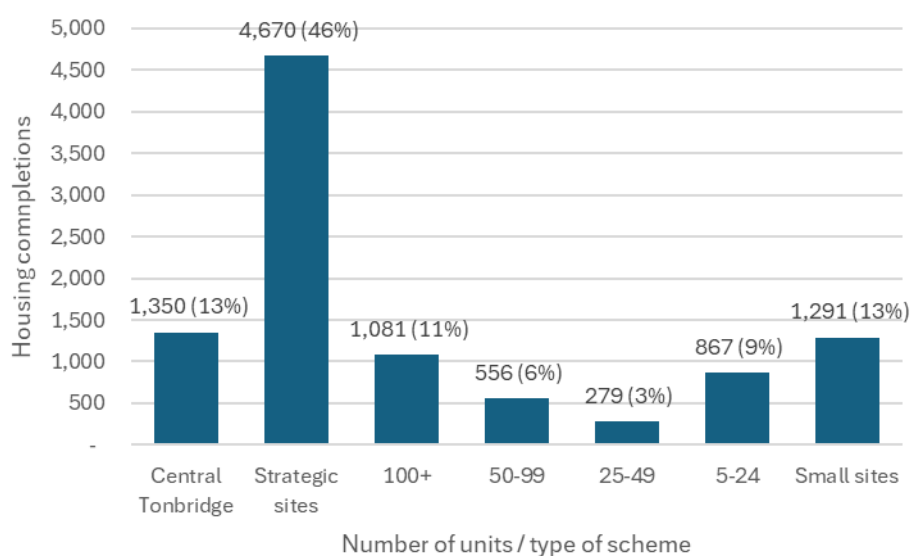
Figure 3.4 Housing completions by year and subarea



Source: Icen analysis of Council data

Scheme Types and Sizes

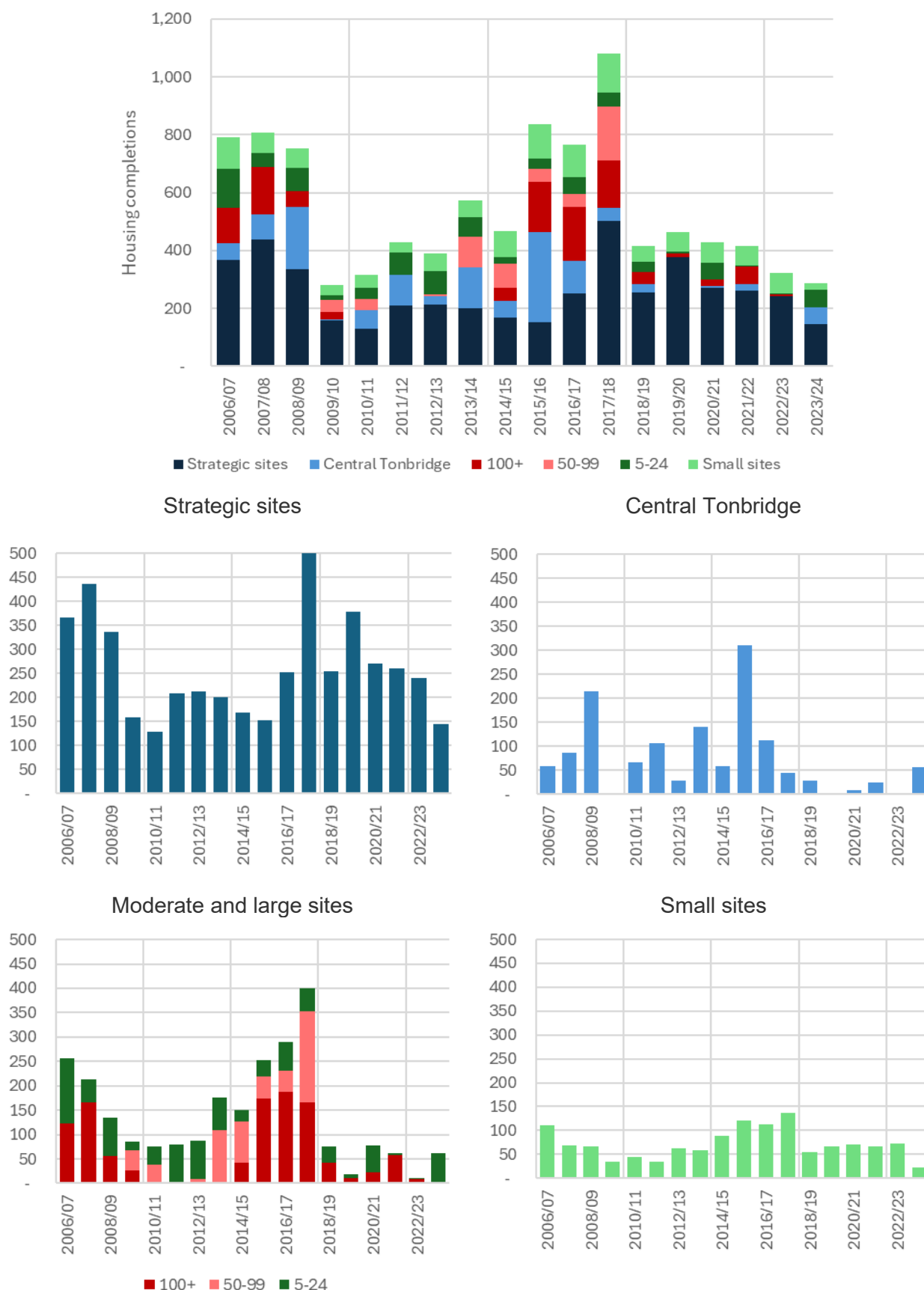
- 3.10 Housing schemes have been categorised by size and status to provide further context to the recent sources of housing supply. Kings Hill, Leybourne Grange, Holborough Quarry and Peters Pit have been categorised as strategic sites, while other schemes outside of Central Tonbridge have been grouped into bands by number of units.
- 3.11 As shown in **Figure 3.5** below, **the four strategic sites have made up almost half (46%) of all housing delivery.** The contributions from each other category have been substantially smaller.

Figure 3.5 Housing completions by size / type of scheme

Source: IcenI analysis of Council data

- 3.12 This data is broken down over time in **Figure 3.6** below. This includes a stacked bar chart showing total housing delivery, and then a series of charts showing the isolated contributions from different sources of supply.
- 3.13 This analysis illustrates how strategic sites have formed the backbone of housing delivery, providing 100-200 units per year between 2009/10 and 2015/16, but over 200 per year otherwise and up to 400 or more in higher delivery years. In years with high overall housing delivery, 100+ unit schemes outside of the strategic sites have also made significant contributions to housing delivery, as has Central Tonbridge.
- 3.14 As noted above, small sites (less than 5 units) have made a modest but relatively steady contribution over time, with at least 50 in almost every year, and over 100 units in some years.
- 3.15 Since 2017/18, delivery in Central Tonbridge and on all categories of non-strategic sites above 5 units has slowed dramatically, contributing in large part to an overall slowdown in housing delivery.

Figure 3.6 Housing completions by size of scheme and year

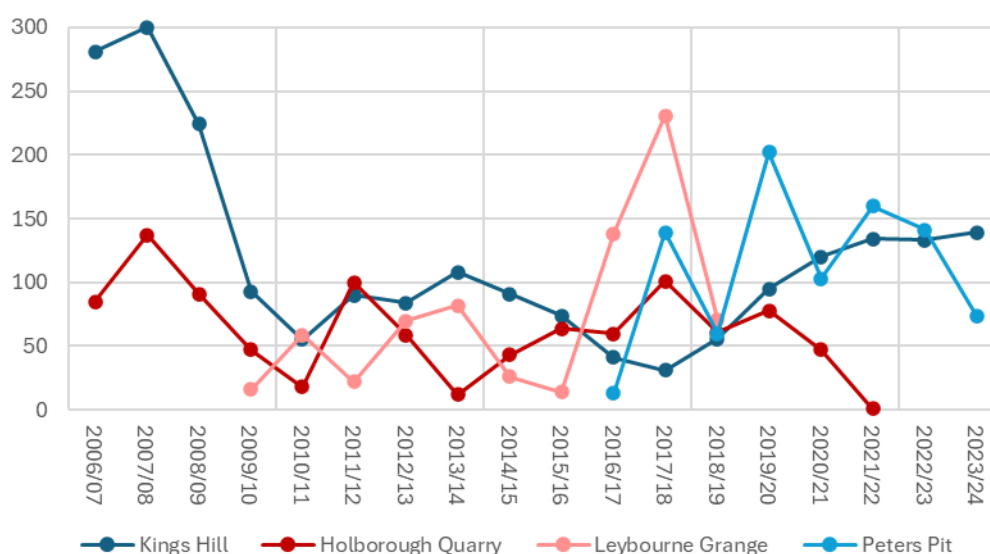


Source: Iceni analysis of Council data

Build Out Rates

3.16 **Figure 3.7** below shows annual housing completions on each of the four strategic sites. Together, these sum to the strategic site totals provided above. This is followed by **Table 3.1**, which shows the average build-out rate for each site and summarises **Figure 3.7** into typical ranges.

Figure 3.7 Annual housing delivery on strategic sites



Source: Council AMRs

Table 3.1 Build out rates for strategic sites

	Average BOR	Typical BORs
Kings Hill	112	75 - 130 225 – 300 (2006/7 – 2008/9)
Peters Pit	112	75-150
Leybourne Grange	73	20 – 80 (2009/10 – 2015/16) 140 – 230 (2016/17 – 2017/18)
Holborough Quarry	68	50 - 100

Source: Iceni analysis of Council AMRs

3.17 Kings Hill had a very high rate of development in the late 2000s. This dropped to around 100 a year or slightly less in the 2010s. While Kings Hill Phase 3 has continued delivering at this rate, development at Land

East of Kings Hill has been included in the above results, leading to a higher build out rate of around 130-140 dpa in the last several years.

- 3.18 There has been substantial year to year variability in build out rates of the other strategic sites. Of these, Peters Pit has been built out at the highest rate (a rate similar to Kings Hill). Leybourne Grange and Holborough Quarry have been built at around 70 dpa, although Leybourne Grange had a spike in development in 2016/17 – 2017/18 during which a large number of flats were completed (as well as a high rate of completion of houses).
- 3.19 When considered as a whole, there is an average build out rate across the four strategic sites of 91 dpa. However, the BOR for individual sites will be sensitive to the number of sales outlets, levels of affordable housing provision and any broader product differentiation.
- 3.20 The following table shows average build out rates for non-strategic schemes. Central Tonbridge has been excluded from these calculations, as brownfield flatted development tends to have different and more lumpy delivery (as blocks get completed).

Table 3.2 Average built out rates for non-strategic sites

Number of units	Aylesford, Larkfield, Medway, Kings Hill & Malling	Tonbridge	Rural	Overall
100-500 (excluding Central Tonbridge)	56			
50 - 99	37	36		
25 - 49	20	29	37	

Source: Iceni analysis

Implications

- 3.21 The analysis in this section demonstrates the Borough's historic reliance on strategic sites, and those in the north-eastern part of the

Borough in particular, has driven overall housing delivery in Tonbridge and Malling historically.

- 3.22 This analysis has also shown that in years with high housing delivery, both strategic sites and smaller schemes have been delivering substantial amounts of housing, housing has been coming forward in multiple parts of the Borough, and in many cases a notable contribution has been made by Central Tonbridge.
- 3.23 Delivering much higher housing delivery rates as required by the Standard Method will likely require greater differentiation in housing development location and housing type in order to capture different housing submarkets, and to create resilience in the event of a downturn.
- 3.24 Continuing to rely on supply in the Northeastern part of the Borough alone, in the context of higher housing policy requirements implied by the standard method, creates a clear risk of under-delivery. The risk is heightened by the proximity of this part of the Borough to Maidstone, which has an ambitious housing delivery program including urban extensions and garden communities as set out in its now adopted Local Plan.
- 3.25 Our experience is that strategic sites feature strongly in driving housing delivery in those local authorities which achieve the growth rates implied by the standard method for Tonbridge and Malling. They tend to be more resilient to economic cycles and can continue to deliver through periods of market downturns. However, for such sites, the Council should consider how schemes can be designed to support multiple sales points; and how policies can be crafted to support greater product differentiation than has been necessarily seen historically.
- 3.26 However, the lead-in times for strategic sites (2,000+ homes) can be significant, and small and medium-sized sites will also play an important role in helping to support early delivery and achieve a five-year land supply at adoption, as well as catering for regional housebuilders.

- 3.27 Housing delivery is likely to be maximised if sites are more broadly spaced throughout the Borough as noted above. The best prospects would be achieved by designating strategic sites in different parts of the Borough, including considering potential for strategic growth at Tonbridge.
- 3.28 As noted in this Chapter, Central Tonbridge has been delivering a variety of flatted schemes, which are relatively different from most other housing being delivered in the Borough. If feasible, continuing to facilitate brownfield redevelopment here and elsewhere would assist to bolster housing delivery rates.

4. Achieving Increased Housing Delivery Rates

- 4.1 To support the step-change in housing delivery implied by the standard method in Tonbridge and Malling, local plan policies and allocations would need to facilitate a steady and increased flow of new homes across the plan period. This chapter explores the practical measures that the Council can use to support increased housing delivery in the Borough.

Build-out rates

- 4.2 Site lead-in times and built-out rates (i.e. number of homes delivered per year) are fundamental to understanding the contribution each site can be expected to make to housing delivery per year, and whether sites can be expected to be delivered within the proposed plan period. Given limitations in build-out rates, it is important to identify enough sites (rather than a small number of large sites) to provide sufficient yearly housing delivery. Equally, maximising build-out rates on larger and strategic sites will have a key role in increasing overall housing delivery rates.
- 4.3 Understanding likely lead-in times and build-out rates will also be critical to building a robust housing trajectory. It is understood that a housing trajectory will be presented with the Regulation 19 version of the Draft Local Plan. Build out rates in a trajectory should be underpinned by a combination of national evidence (for example Lichfields' *Start to Finish* research) and local evidence (for example the profiling of local housing delivery rates using Council data in Chapter 3). Site-specific factors will also play a role, and are discussed in general below, and in more detail for Tonbridge and Malling's proposed sites in Chapter 5.

Site-specific factors influencing build-out rates

- 4.4 Factors which can influence the build-out rate include the strength of the local market, macro-economic influences (from interest rates to support to new-build sales from the Help-to-Buy scheme) and the level of affordable housing provision.
- 4.5 Lichfields' research showed higher housing delivery on greenfield sites, those in areas with more acute affordability pressures and higher levels of affordable housing. It also identified that the number of sales outlets was a key factor influencing the build-out rate. Some sites have a number of different sales 'outlets' (sometimes described as flags), with separate plots and marketing suites, where there are multiple housebuilders on-site and delivering homes simultaneously. Lichfields' research also showed that greenfield schemes were generally built-out faster than those on brownfield sites – identifying (logically) that flatted development tended to have a more lumpy build-out and be more susceptible to market downturns. This coincides with our experience.
- 4.6 The size of a site has a strong bearing on its delivery profile. Smaller sites can be brought through the planning process more quickly and have development mobilised more quickly (e.g. they may not have as much upfront infrastructure required). However, larger sites may support multiple housebuilders and sales outlets as well as more product diversity, all factors which contribute to higher build out rates; and in our experience can play a key role in providing greater resilience to housing delivery across the economic cycle.

Government's Speeding Up Build Out Consultation

- 4.7 Central Government is consulting at the time of writing on reforms to speed up the build-out of housing schemes.³ There is a recognition within this – drawing on the findings of the Competition and Markets Authority Study – that currently houses for sale are built out at a rate

³ Planning Reform Working Paper: Speeding Up Build Out (May 2025); and Technical consultation on measures to improve Build Out transparency (May 2025)

that they can be sold, with local absorption rates identified in the Letwin Review as a 'binding constraint' on build out rates. We would note that schemes of flats tend to be different as individual blocks have to be completed in one go.

- 4.8 The Government Build Out Rates Paper seeks to consider opportunities to increase absorption rates to get homes built more quickly, as well as consider further actions which can be taken to strengthen the ability of Councils to unblock stalled and stuck sites. Its proposals are thus of direct relevance to this report.
- 4.9 The Government consultation identifies many of the factors which influence the speed of delivery of sites which have been considered herein, including local demand, levels of affordable housing and product diversity.
- 4.10 The specific recognition of the role of product diversity is helpful, and the Paper identifies the Government's intention to see a permanent, comprehensive Mortgage Guarantee Scheme⁴; as well as identifying the role of the Affordable Homes Programme, demand from housing associations for s106 properties and a robust Build to Rent Sector in supporting housing delivery.
- 4.11 We would note that the ability to secure an RP to deliver affordable housing within a s106 package has become increasingly challenging over the last couple of years, in the context of financial capacity constraints and other investment priorities – including investment in existing stock. Larger RPs have been prioritising other routes to development including land-led grant funded delivery rather than the purchase of s106 properties. Funding and wider changes to support capacity in the sector (such as a longer-term rent settlement) are necessary to address these.

⁴ Enabling First-time Buyers to secure mortgage finance with a 95% loan-to-value ratio, the effect of which is to support First-time Buyer numbers

- 4.12 Over the longer-term we consider that increasing product diversity will have an important role in increasing build out rates in a resilient way.
- 4.13 The Government's consultation papers for instance note some evidence that projects with Build-to-Rent can support build out rates which are between 30-60% higher than average. **The role of tenure diversity on large, strategic sites is particularly identified** – with partnerships models which include pre-selling homes to institutional investors for BTR and to RPs for affordable homes. Iceni would note that retirement housing would equally contribute to product diversity. It is appropriate therefore to consider product diversity issues at the plan-making stage – not least as the Council has leverage at this point in the development cycle, as promoters are looking to secure site allocations. Product diversity can also help to ensure that the delivery of housing meets the range of housing needs identified in the plan's evidence base. We consider this further below.
- 4.14 The Government's consultation paper also argues that absorption constraints are less pronounced for schemes delivered by SME housebuilders who are typically less well capitalised and will therefore prioritise a faster return of capital at a lower margin, meaning overall they deliver schemes faster. Whilst this may not translate directly into a higher number of units delivered on a single scheme in a year, the consultation sets out that *"homes granted planning permission across many small sites will typically build out faster than the same number of homes granted planning permission on a single site."* It is understood that there are a variety of smaller sites promoted as part of the Tonbridge and Malling local plan process which could facilitate delivery in this way.
- 4.15 Both the consultation (and the Letwin Review prior to this⁵) have identified issues with build-out rates on large urban extensions. In a

⁵ Independent Review of Build Out: Final Report (Oct 2018)

Borough-specific context, several of the sites considered in the previous chapter fall into this category.

4.16 Specific measures proposed within the current consultation on speeding up build out include:

- **Build-out Reporting Framework** – the Government is proposing to introduce new policies requiring developers / promoters to submit a ‘build out statement’ at the planning application stage, setting out expected delivery timeframes; to notify LPAs when development commences; and then report annually on housing delivery against this through a ‘development progress report’ which would be required to justify any under-delivery.
- **Mixed-tenure Thresholds** – the Government is seeking to incentivise higher delivery on larger schemes, and is promoting a threshold for larger sites above which it will expect greater product diversity;
- **Delayed Homes Penalty** – A penalty is proposed within the Government’s consultation where “build out is falling significantly below the agreed schedule without a reasonable justification.” It is proposed as a last resort measure with a financial penalty payable for non-completion of dwellings against the agreed build-out schedule.

4.17 It seems likely that the specific metrics proposed by Government require further work, recognising for instance the macro-level influences on build-out rates, factors which can result in changing viability of schemes over time, as well as the role of land promoters in taking strategic sites forward through the planning system. As currently proposed, there are also risks that the build-out reporting framework proposed has insufficient regard to economic factors which impacts on market demand and infrastructure delivery issues which can affect site delivery. We would therefore expect some of the measures to evolve before they are implemented.

4.18 There are also actions which could be considered which are not covered – including the role which public sector bodies (including Homes England) could play in co-investing in sites to help de-risk their delivery; and the role of local plan policies in helping to support product and tenure diversity on larger residential schemes.

- 4.19 Nonetheless, the prospect of a reporting framework on build-out rates – if properly constructed – may help to promote the timely delivery of sites and indeed could make the monitoring of delivery (and associated housing land supply reporting) more straight forward in time.

Considering Product Diversity

- 4.20 In the context of considering further issues of product diversity, Icení has had regard to the housing needs evidence base and what this tells us about the potential need for different housing products.

Affordable Housing

- 4.21 The 2025 Tonbridge and Malling Strategic Housing Market Assessment (SHMA) identifies an annual affordable net housing need in the Borough of 647 dpa. This includes a need for both social and affordable rented housing, with a smaller need for affordable ownership. While this amounts to an acute need for affordable housing, an affordable housing target is not identified, with the amount of affordable housing subject to development viability.
- 4.22 In the context of the needs position, **opportunities to support high affordable housing delivery would feed directly into higher build-out and absorption rates**. As an example, with 40 private sales 40% affordable housing yields 66 dpa overall; whereas 50% yields 80 dpa – a 21% uplift on the Build Out Rate.
- 4.23 In this respect the ‘Golden Rules’ relating to sites released from the Green Belt (or schemes permitted on them) provide the potential to enhance the overall housing delivery rate relative to historic trends. Equally growth in funding availability which provides ‘additionality’ to the affordable offer can help to boost overall housing delivery.
- 4.24 The Council might reasonably encourage developers to engage RPs in partnerships to bring forward larger sites, in particular to help secure funding through the National Affordable Housing Programme to deliver

additional affordable housing (over and above the base policy requirements). This can directly feed into absorption rates.

Build-to-Rent

- 4.25 The 2021 Census shows that 12% of households (6,700 households rounded) lived in the Private Rented Sector in the Borough. This was a significant increase on the 4,900 such households (10%) in 2021. However, the wider context has been of changing market dynamics for smaller landlords/investors in recent years, with legislative and tax changes making the management of individual properties or small portfolios more challenging and eroding margins. In this context, supporting institutional investment in the sector through build-to-rent development is important to maintaining supply and rental affordability (which in turn can help manage affordable housing pressures through addressing homelessness presentations).
- 4.26 The SHMA (2025) identifies potential future development interest in Build-to-Rent in the Borough. This would help in meeting housing demand and provide tenure choice – particularly on large multi-phased sites. Tonbridge and Malling could help to support growth of this sector, with a particular focus on the emerging ‘suburban’ or ‘single-family’ BTR sectors.
- 4.27 Savills reported in March 2025 that £2.5 billion was invested across the UK in single family housing in 2024⁶, with now 14,000 completed homes and a further 13,000 under construction. It identifies that suburban markets remain supply constrained and identified potential nationally for this market segment to deliver c. 32,000 homes per annum nationally. There is clear potential for suburban sites to contribute to delivery in these terms.
- 4.28 IcenI would recommend that the Council consider policies promoting the delivery of build to rent development as part of the larger schemes

⁶ https://www.savills.co.uk/research_articles/229130/374423-0

within the Borough, i.e. those providing over 750 dwellings (including committed phases). This could capture for instance all of the sites discussed in Chapter 5.

- 4.29 It may be appropriate to review the consistency of the size threshold with that taken forward nationally by Government.

Retirement & Other Specialist Housing

- 4.30 The SHMA (2025) shows a growing proportion of older people in the Borough, in particular those over 75 who are more likely to need specialist housing. It identifies a need for additional spaces as follows:

- Housing with support: 950 units (split between 485 market units and 466 affordable);
- Housing with care: 223 units (split between 155 market units and 69 affordable);
- Residential / nursing care bedspaces: 722 bedspaces, split between 208 nursing care and 514 residential care.

- 4.31 In the context of this clear identified and growing need, as well as the need for greater product diversity to build resilience in the housing trajectory, Iceni consider that there is a strong case for working with site promoters as part of the plan-making process to encourage further provision of specialist housing – in particular as part of larger schemes which include local centres. In this context, the Council might consider seeking specialist housing provision on the following sites through local plan policies (if they are allocated):

- Land North and West of Holborough Lakes (SN1)
- Land East of Kiln Barn Road (MG4)
- Land North of Borough Green (BG1)
- Land Northwest of Tonbridge (TO1).

- 4.32 On such sites, the Council could consider making specific recommendations on the scale and range of specialist housing provision expected within site-specific policies. It should engage with site promoters on these issues as the plan-making process continues.

Place-Making Investment

- 4.33 The Council will need to examine as part of the plan-making process the inter-relationships between infrastructure provision, the delivery of strategic development schemes and viability.
- 4.34 A report by Savills on the *Value of Placemaking* has shown that upfront investment in the delivery of social and community infrastructure makes developments more appealing and can have a positive effect on both the pace of sales / delivery and residential values. It particularly highlights the role of schools in supporting buyer demand. The report however demonstrates that to support this upfront investment requires 'patient capital' whereby essentially land is paid for over time rather than upfront creating more financial capital to invest in place.

Planning Process

- 4.35 The scale of increase in housing delivery implied by the revised standard method points requires a step change in housing delivery in the Borough. As a result, there could be a significant number of large applications being submitted to the Council around and immediately following the Local Plan Examination.
- 4.36 There are clear resource implications of this, and it will be important that the Council carefully considers this – and seeks to fully utilise both the prospect of growth in planning application fees (as being considered nationally) and planning performance agreements to invest in growth of its in-house staffing resource.
- 4.37 An increase in housing applications could also put pressure on other bodies involved in the planning application process including statutory consultees. The Council will need to work carefully with organisations external to it including Kent County Council, the Environment Agency and Natural England to ensure timely input to planning applications, the resolution of S106 Agreements and discharging planning conditions.

- 4.38 The Council might reasonably consider how the process for engagement with such external bodies is managed, where there are opportunities to set jointly expected standards for engagement/ input. Equally the Council might consider how it works proactively to identify and address blockages which are holding up delivery of key schemes (including at the plan-making stage).

5. Strategic site assessment

- 5.1 Strategic sites will play a central role in delivering the scale of new housing required in Tonbridge and Malling. Their size and capacity mean they can contribute significantly to annual completions once underway, but they also bring complex planning, infrastructure and delivery considerations.
- 5.2 In this context, it is important to consider site-specific deliverability issues alongside the opportunities these locations present. Iceni has reviewed sites proposed to be allocated in the draft Local Plan, and considered more closely the deliverability of those with potential capacity for around 600 homes or more. A discussion of each of these sites is provided in this chapter.
- 5.3 As part of this process, we have sought to engage with the promoters of key sites through meetings to discuss their planning strategy, expected timings of planning applications and build-out expectations. Meetings were held in May and June 2025 to interrogate these issues.
- 5.4 The information presented in this section largely reflects discussions relating to candidate sites promoted for development through the Council's Land Availability Assessment, and unless otherwise noted is not indicative of Council's inclusion of these sites within the emerging Local Plan (both in the Regulation 18 Draft LP and in later more detailed allocations). Where there are differences between the scale of development being promoted and what the Council is proposing to allocate (or may be achievable over the proposed plan period), then this is noted.

Land North and West of Holborough Lakes, Snodland (Site SN1)

- 5.5 Tonbridge and Malling's Regulation 18 Draft LP proposes an allocation of 1,300 homes on this site. The site is being promoted by Hallam Land Management in partnership with the landowners Tarmac and Holcim UK.
- 5.6 Land is being promoted at this location both in the administrative boundaries of Tonbridge & Malling Borough Council and within Medway Council's area. The land comprises a mix of worked quarry areas, cement works, and agricultural land, with existing planning permission for industrial use including a cement works and associated quarrying over a large part of the site.
- 5.7 Representations have been submitted to both Councils as part of ongoing Local Plan processes, with the site being actively promoted for residential-led mixed-use redevelopment. A variety of technical work on the site has been completed.
- 5.8 The promoters envisaged a cross-boundary development of approximately 3,500 homes, distributed between the two authorities, with indicative allocation of around 1,250 homes within Medway and 2,250 within Tonbridge and Malling. However, Medway Council have not included the site in the Regulation 19 Local Plan (published in August 2025), and Tonbridge and Malling's Draft Plan proposes an allocation for 1,300 homes. As promoted, the scheme would also include new schools (primary and secondary), a local centre, healthcare and community uses, open space and green infrastructure, and potential employment and leisure components.
- 5.9 Discussions between Iceni and promoters took place prior to the publication of Medway's Regulation 19 draft Local Plan or a decision taking place on the size of the allocation within Tonbridge and Malling . The potential phasing and infrastructure strategies will thus need to be considered further as the plan-making process progresses.

- 5.10 Site access is proposed via a roundabout on the Borough boundary at the intersection of the A228 and Peter's Bridge. This roundabout already contains an access point for the Site. This is intended to be the only ongoing access point for the site, with rural lanes currently running through the site remaining as rural lanes or carrying buses only.
- 5.11 No fixed delivery model had been decided upon. The site may either be brought forward by the promoter acting as a master developer, or through phased parcel disposals to housebuilders, with the approach to be refined as the planning process advances and once marketing commences.
- 5.12 As at Summer 2026, the promoters anticipated first completions in 2028/29, subject to plan allocation and outline permission and likely following submission of an outline application in parallel with the Local Plan Regulation 19 consultation. They anticipated the Tonbridge & Malling component would achieve peak delivery of 250 homes per annum, with full build-out concluding before 2042.
- 5.13 Given that the site is in freehold landownership with existing access and technical work substantially underway, there are good prospects for relatively early delivery of housing on this site. Nonetheless, it may not be possible to deliver housing as soon as suggested by the promoters, or at the suggested rates. At 1,300 units, this is a scheme of substantial size which would require negotiation and agreement on a range of infrastructure issues as well as concurrence from multiple stakeholders. Given this, planning lead-in times would invariably be longer than suggested. There is the potential for some additional delay due to site disposal (depending on the delivery strategy adopted).
- 5.14 The site offers the potential to see concurrent delivery by both national and regional housebuilders; with potential for different products (flats and retirement) in the local centre and neighbourhood cores; and for different parts of the site to have a different character.
- 5.15 Risks to housing delivery on this site include:

- Unresolved cross-boundary issues, with the Medway portion of the site not included in the Regulation 19 Draft Medway Local Plan.
- Delivery of required infrastructure, the details of which remain to be determined particularly given the difference in site size between what was promoted and what has been included in draft local plans;
- Capacity testing on the site's access points on the A228 was still underway when discussion took place. Delays in agreeing or funding improvements could constrain early phases. In addition, given the size of the site input from Highways England and Kent County Council's transport team could be critical, with the potential for issues around M2 junction capacity.

Land at Aylesford Lakes, Aylesford (Site AY1)

- 5.16 This site is part of a landholding around two lakes situated between the historic villages of Aylesford and Eccles. Quarrying activity is ongoing at the northern edge of the western lake but does not directly affect the developable area. Access to the site is from Bull Lane and Rochester Road, depending on the part of the site (an existing access to Rochester Road is in use for the quarrying operation).
- 5.17 Discussions took place with the site promoter prior to the development of the Regulation 18 Draft Local Plan. As such, discussions concerned the entire potential site as well as the portion being promoted, and were not specifically focussed on the area and quantum of housing proposed to be allocated by Tonbridge and Malling in the Regulation 18 Draft LP.
- 5.18 The site has a complex planning history, including:
- A previous allocation in the now-superseded draft Local Plan (initially for 1,400 homes, later reduced),
 - An appeal for a 146-home scheme in 2018 dismissed on heritage grounds.
 - Outline approval for a later living scheme was granted in 2023 for up to 440 units (including a mix of C3 and C2) and an 80-bed care

home on the then southern portion of the site. Progress has since been made on discharging conditions.

- A PPA has been signed for a 300-home development on the north-western portion of the site, which sets a timetable for outline approval by the end of 2025.

5.19 Including the later living scheme, the portion of land with the current PPA and the remainder of the land, the landowners estimates there to be capacity for 1,400 – 1,660 dwellings in total across the site, but 800 dwellings is currently proposed to be allocated within the Regulation 18 Draft LP.

5.20 Abutting the site to the North, a site surrounding Eccles has recently been approved at appeal for 950 residential dwellings, a school, local centre and retirement home.

5.21 This site is being promoted for development by the landowners, who intend to develop themselves and have reported active engagement with, and interest from, homebuilders. The landowner has expressed confidence in achieving early starts post-consent and has indicated an intention to phase development across the wider landholding. Preparatory technical work is largely underway or complete, and the site does not have any known technical, legal or ownership constraints.

5.22 Given the existing outline consent and PPA, and interest from homebuilders, there are good prospects for early completions on this site within 5 years of plan adoption. Dual access, several development parcels, a lake-front setting and a variety of proposed housing types provide product differentiation potential and are likely to support ongoing phased development with moderate build-out rates.

5.23 There is a risk that given the quantum of housing proposed on this broader site, and a further 950 home scheme to adjoining land to the north, infrastructure impact and coordination issues could arise and impact on delivery timings.

**Land East of Kiln Barn Road and West of Hermitage Lane,
Aylesford (Site MG4)**

- 5.24 The site is subject to an application for outline consent for a 1,300-home residential led development, submitted in March 2024 by the landowners (The East Malling Trust). The application includes proposals for a new village centre, a two-form entry primary school, ancillary commercial, community, and employment floorspace, as well as open space. All matters are reserved besides access, with three access points proposed (two off Hermitage Land and one off Kiln Barn Road).
- 5.25 The site is additionally proposed for allocation for 1,300 homes in the Regulation 18 Draft LP.
- 5.26 The promoters anticipate phased disposal of the site following the grant of outline consent, with a consortium approach also possible. The multiple site access points and size of the scheme mean multiple outlets are possible, with the potential for multiple housebuilders, a housebuilder with different flags or a combination of approaches.
- 5.27 The promoters anticipate a phased delivery over approximately seven years from first completions. Delivery would peak later in development, with two phases totalling 355 units in year 5 and similar in year 6. A grant of outline consent is expected during 2025, with it understood that highways issues are among the only ones remaining to be resolved. Site marketing is expected at the end of 2025 or start of 2026, and development on-site from 2027 onwards.
- 5.28 This site appears to present relatively few delivery risks, assuming that outline consent is granted. While the site promoters stated that there is good market capacity in the area and homebuilders are searching for sites, there are several large sites in the immediate vicinity (for example the Barratt Homes development on the other side of Hermitage Lane, and the development on Hermitage Lane south of Barming Station).

Land at Broadwater Farm, Kings Hill (Site KH1)

- 5.29 This site is being promoted by Berkeley Homes in conjunction with the landowners. A smaller parcel of land to the north, required to facilitate access, is also under contract. Site capacity is noted to be for around 900 dwellings, consistent with the previous draft allocation and as proposed to be allocated in the current Regulation 18 Draft LP. The housing mix is expected to comprise a mix of two- to five-bedroom homes, with some low-rise apartments.
- 5.30 The scheme includes provision for a new two-form entry primary school, and land for a secondary school intended to meet both new and existing needs in the area. In the application the promotor proposed a new road link from Kings Hill to the A228 with two vehicular access points, although access arrangements in a revised scheme remain to be determined.
- 5.31 The site was previously allocated in the draft Local Plan and has been the subject of an earlier outline application, which was withdrawn following Historic England's conclusion that the proposal would result in substantial harm to heritage assets. The scheme has since been redesigned to minimise potential heritage, with the promotor noting this redesign has been well-received by Historic England.
- 5.32 As at Summer 2025, the promoters were not currently progressing a live application and intended to bring forward a scheme in a plan-led manner, likely following adoption of the emerging Local Plan. Following submission and determination of a planning application, they would aim to be on-site within 18 to 24 months, with first completions anticipated approximately three years from submission.
- 5.33 The full build-out of the site is intended to take place within the 15-year Local Plan period. Delivery is expected at a rate of approximately 90–100 dwellings per annum. While this would likely be through a single outlet, affordable housing components were noted to have the potential

to increase delivery rates (as logically wider product differentiation would).

- 5.34 There is some risk to delivery of this site from a heritage point of view, but this would be minimised by the scheme's redesign, and by it being brought forward in a plan-led fashion (noting the promoters do not intend to apply for a new permission in advance of the local plan process). There is an unresolved issue around negotiation with the landowner to the south to secure a southern access route into Kings Hill which will need to be considered through collaborative working of the relevant stakeholders.

Land North of Borough Green, Sevenoaks (Site BG1)

- 5.35 This site is proposed to be allocated for 3,000 homes in the Regulation 18 Draft Local Plan, with 2,000 to be delivered within the plan period. The site wraps around the north of the existing settlement of Borough Green. It lies within the Green Belt, and partially within the Kent Downs National Landscape, although it is understood that the proposed allocation would not be for residential development within the National Landscape portion.
- 5.36 The site was previously allocated in the withdrawn 2019 Local Plan and has been promoted by a consortium of six local landowners. It was included in and received multiple rounds of funding through the Homes England Garden Communities Programme in 2019 and 2021.
- 5.37 Substantial preparatory and planning work was undertaken, including by TMBC. Countryside had been appointed as the delivery partner and master developer.
- 5.38 The previous concept masterplan for BGG included 3,000 homes, of which 1,720 were intended for delivery within the previous draft plan period (i.e. by 2031).

- 5.39 The scheme incorporates a new relief road bypassing Borough Green (linking the A25 to the A20 via the A227), a country park, two new local centres, primary education provision, healthcare, open space and employment uses. The site was proposed to be phased into three neighbourhoods, with a mix of homes including affordable housing, starter homes, self-build plots and modular housing.
- 5.40 There are several challenges associated with the delivery of this site:
- Much of the land comprises worked or despoiled ground (e.g. infilled quarries). While this works in favour of the scheme as redeveloping despoiled land which may not strongly meet green-belt purposes, remediation will be required.
 - Development will require coordination across multiple land interests in the consortium.
 - Infrastructure will be required to enable development, with the proposed relief road integral to reducing pressure on the A25 and enabling site access.
- 5.41 Promoters have indicated that the trajectory and phasing previously prepared are still appropriate, but with a different start date. This would see around 4.5 years of lead-in time from Local Plan Adoption, with delivery then ramping up from 50 homes in the first year to 150 and then 250 in subsequent years. Evidence was prepared for the examination of the Local Plan showing that this build-out rate is possible based on Countryside's experience in delivering other schemes, and on the expectation of providing multiple outlets with 50-70 dpa per outlet.
- 5.42 Given that evidence was prepared in line with an earlier masterplan, infrastructure and access arrangements may need to be revised.
- 5.43 Notwithstanding the constraints outlined above, this scheme appears to be deliverable if it is supported by TMBC and brought forward in a planned way, and constraints can be appropriately mitigated. This site is likely to support robust sales due to its position near the strong housing market of Sevenoaks and on a train line with links to London, Maidstone

and Ashford. This, as well as the scale of the site and the potential for a variety of outlets and for product differentiation, underpin the potential for strong build-out rates to be achieved here.

- 5.44 However, without strong support through the Local Plan process and to progress an application quickly, there would be severe risks to planning and delivery timeframes.

Land North-east of Tonbridge (Site TO1)

- 5.45 This site comprises several parcels of land located to the north-east of Tonbridge in the Green Belt. Two parcels are being promoted by Gallagher Developments – one south and west of Higham Lane, and the other fronting the A26 south of Cuckoo Lane. Another part of the site, east of Higham Lane and between the two Gallagher parcels, is controlled by Taylor Wimpey.
- 5.46 Discussions between Iceni and Gallagher took place prior to the finalisation of the Regulation 18 Draft Local Plan, but Iceni has not held discussions with Taylor Wimpey about this site to date.
- 5.47 Although under separate ownerships, both parties are aware of each other's interests, and according to Gallagher have indicated a willingness to coordinate a comprehensive masterplan should the Council favour this approach. Taylor Wimpey's and Gallagher's sites are capable of being accessed independently from the A26, Higham Lane and the western edge, allowing for effective phasing and parallel delivery.
- 5.48 The Regulation 18 Draft LP allocates the combined site, including both Gallagher and Taylor Wimpey's interests, for 1,671 homes in total, with most on Gallagher's land (earlier discussions between Iceni and Gallagher indicated capacity of around 1,100 on Gallagher's land and 400 on Taylor Wimpey's land) The overall scheme would be residential-led but includes provision for schools, retail and leisure facilities.

- 5.49 Subject to allocation in the Regulation 18 version of the Local Plan, Gallagher have indicated that they would seek to progress a planning application by mid-2026, likely in parallel with Regulation 19 consultation. A determination period of 12 months is assumed, with outline consent achievable by mid-2027 and first completions in 2029. They expect the site to deliver at an annual rate of 100 dwellings in the initial years, rising to around 200 dpa at peak due to the potential for multiple outlets and access points on the Gallagher part of the site.
- 5.50 Off-site transport impacts are acknowledged as a potential issue, noted that intersection capacity within Tonbridge Town Centre was a problem for a proposed allocation within the Tunbridge Wells Local Plan. In response, Gallagher is developing a strategy focused on modal shift including improved pedestrian and cycle connectivity to Tonbridge town centre. In addition, internal link roads would potentially enable a west–east connection that would reduce reliance on Higham Lane for through movements.
- 5.51 Given the strong housing market in Tonbridge, there is the potential for this site and the adjacent Taylor Wimpey site to achieve robust sales rates. Should the site continue to be supported by Council in the Local Plan, the principal delivery risk appears to be transport-related as discussed above.
- 5.52 Given the size of the combined Taylor Wimpey and Gallagher sites, a joint masterplan / framework plan is likely to be necessary, considering among other things the coordination of infrastructure.

6. Conclusions

- 6.1 As discussed in this study, a step-change in housing delivery is needed if delivery rates are to increase from the Borough's historical average of 629 dpa to the Standard Method requirement of 1,097 dpa.
- 6.2 Icení's review of historic delivery and housing market conditions indicates that delivery at this scale is potentially achievable given that:
- Experience from other authorities, including Maidstone and Oxfordshire authorities, confirms that uplifts in delivery to required growth rates can be sustained following adoption of ambitious Local Plans with a robust land supply.
 - Market signals support the case for increased housing delivery. House prices and rents in Tonbridge and Malling remain high relative to wider benchmarks, with affordability ratios well above the South East and England averages.
 - The proportion of new build sales relative to total transactions has declined in recent years and now sits below regional norms, indicating that there is potential capacity within the market to support higher levels of new build delivery, subject to appropriate site supply and tenure diversity.
- 6.3 Nonetheless, achieving the Standard Method in Tonbridge and Malling remains challenging, with downside risks to short term delivery and a recovery in the housing market needed – highlighting risks to sustaining higher housing delivery across the economic cycle. This underlines the need for local plan policies to help facilitate higher housing delivery and build out rates in particular, and to build realism and resiliency into the housing trajectory. These are considerations for the plan-making process as the Plan moves forward to the Regulation 19 consultation.
- 6.4 Tonbridge and Malling has historically relied heavily on larger strategic sites, and on sites in the north-eastern part of the Borough for housing delivery. In the context of higher housing need, continuing this approach would entail considerable risk around market capacity and depth.

6.5 Specific recommendations to support increased housing delivery include:

- **Broaden the supply base** by allocating a wider mix of sites across multiple submarkets relative to that seen historically. This includes continuing to support delivery in the north-east of the Borough but also reintroducing brownfield delivery in Central Tonbridge and ensuring that sites around Tonbridge and in other parts of the Borough are brought forward where this is consistent with achieving sustainable development.
- **Promote product and tenure diversity**, including Build-to-Rent, affordable housing (through both s106 and grant-funded routes), and specialist accommodation for older people, particularly on larger sites.
- **Support infrastructure delivery**, particularly where this is critical to unlocking the phased release of strategic allocations.
- **Ensure the planning system is resourced and agile**, including through the use of planning performance agreements, to facilitate the timely determination of applications and discharge of conditions.
- **Make realistic trajectory assumptions** regarding for example, lead-in times and build-out rates, to ensure that a sufficient supply of sites is included and too much reliance is not placed on a limited number of sites. A supply-side buffer to reflect delivery risks will ultimately also be necessary and will require further consideration as the plan-making process progresses.