

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan

February 2021



Executive Summary	1
1.0 Introduction	3
2.0 Regard to the National Policy Background.....	4
3.0 Local Policy Background.....	7
Local Plan housing targets	7
Five-year housing land supply.....	9
Housing delivery test	9
Neighbourhood plans	10
4.0 Housing Delivery Phasing and Build-out Rate Methodology	11
Introduction: housing delivery phasing and build-out rate methodology	11
National studies on building rates.....	12
Historic build-out rates, permissions granted and development management performance	13
Evidence gathered through the Strategic Housing and Economic Land Availability Assessment (SHELAA)	16
Discussions with developers and house builders	16
Assumptions made.....	17
Smallest sites (less than five dwellings)	17
Small sites (five to 99 dwellings)	18
Medium sites (100 to 500 dwellings)	20
Large sites (501 to 2,000 dwellings).....	21
Super-size sites (2,000 plus dwellings)	22
Phasing conclusion (applicable to all sites)	23
Build-out rates	23
Annual monitoring processes	26
5.0 Local Plan Housing Trajectory	27
Purpose of the Local Plan housing trajectory	27
Overview of the Local Plan housing trajectory.....	27
Extant planning permissions and C2 discounting	34
Site Allocations Local Plan (SALP), 2016 allocations.....	34
Pre-Submission Local Plan (PSLP) site allocations	35
Introduction	35
Staggered development within settlements	35
Allocation capacities and ranges	36
Site Allocations with extant planning permission	36
Phasing and build-out rates	37
C2 discounting.....	37

Strategic site allocations	38
Windfalls.....	39
Small sites (one-nine units).....	39
Large windfall sites (10 units plus).....	40
6.0 The Supply of Housing for Particular Groups.....	42
Affordable housing provision	42
Site size thresholds.....	42
Proportion of affordable housing sought.....	43
Tenure mix and viability	44
Design and building standards for affordable housing	44
Local connection cascade	44
Housing for older people	45
Housing for people with disabilities	46
Self-build and custom housebuilding.....	46
Gypsies, Travellers and Travelling Showpeople.....	50
Site criteria.....	51
Sources of supply	51
Proposed policy and sites identified with potential for delivering additional pitches and site allocations	56
Small and medium sized sites	57
7.0 Conclusion	58
Appendix 1: TWBC Completion Rate Average (Mean)	60
Appendix 2: TWBC Build-Out Rates per year (2006-2020).....	61
Annex 1 of Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan: Gypsy and Traveller Site Assessments	63

Executive Summary

1. Tunbridge Wells Borough Council is currently producing a new Local Plan to guide development from 2020 to 2038. Based on the Government's 'Standard Method' calculation (used as a means of measuring the Council's housing delivery target), there is a need to seek to ensure that 12,204 homes are delivered by 2038. This is in addition to any unmet housing needs from neighbouring authorities, in relation to which the current Sevenoaks Local Plan, although not found sound, leaves an unmet need for 1,900 dwellings.
2. A review of housing needs, including those of particular groups, is contained in the accompanying Housing Needs Assessment Topic Paper. This and all supporting documents referred to throughout this document can be found under [Supporting Documents](#) on the Council's Local Plan web page.
3. As at 01 April 2020, 3,313 dwellings have extant planning permission. With approximately 8,274 dwellings to be delivered on new site allocations in the Local Plan, including on some site allocations carried forward from the Site Allocations Local Plan, (SALP; 2016) as well as a windfall allowance of 1,670 (122 per annum from 2023/24 for 7 years, followed by 102 per annum from 2030/31), the Local Plan provides for the delivery of approximately 13,257 dwellings by the end of the Plan period. This figure allows an 8.6% "buffer" over the Standard Method requirement, to provide flexibility for any delays in identified and windfall sites being built out as envisaged or, otherwise, an opportunity for further contributing to housing needs.
4. This Housing Supply and Trajectory Topic Paper outlines the housing delivery and phasing methodology used for, and applied to, the phasing and likely build-out rates of site allocations expected to be delivered within the plan period as a means of achieving a housing supply target of 12,204 dwellings. This methodology builds on national studies of building rates, historic local build-out rates, permissions granted and Development Management performance, evidence gathered through the 'Strategic Housing and Land Availability Assessment' (SHELAA) to identify potential sites for residential development.
5. The Council also undertook a consultation exercise with site promoters to find out likely build-out rates and expected years for the submission of a planning application for their site. Where these were provided, the housing trajectory seeks to take these into account and, where appropriate, amends the phasing methodology to reflect site promoter expectations. This has subsequently been used to determine the likely phasing and build-out rates of the smallest sites (less than five dwellings), small sites (5-99 dwellings), medium sites (100-500 dwellings), larger sites (501-2,000 dwellings) and super-size sites (2000+ dwellings) to be delivered through both extant planning consents and site allocations in the new Local Plan.
6. In accordance with this housing delivery and phasing methodology, a housing trajectory has been produced which phases all new site allocations, extant planning permissions, and windfalls by year throughout the Plan period in order to ensure that a

sufficient and consistent supply of housing is delivered up until 2038, with particular regard to maintaining a 5-year supply of deliverable both early within and throughout the plan period.

7. This Topic Paper further seeks to address how the Council will help meet particular housing needs identified in the Housing Needs Assessment Topic Paper. It proposes changes to the requirements for affordable housing, to increase the supply from new developments; it puts forward a robust approach to increasing the supply of homes suitable for the range of needs of older and people with disabilities; it identifies how the needs for self-build and custom housebuilding will be met; it identifies sites which provide the potential to meet the recognised pitch requirements for Gypsies and Travellers, primarily through intensification, expansion, and/or regularisation of existing sites; in addition, it shows that the NPPF's small and medium-sized site requirement for 10% of the total housing supply to be provided on sites of one hectare or less will be met and exceeded over the plan period (being 26% overall and 15.2% excluding windfall sites)

1.0 Introduction

- 1.1 Tunbridge Wells Borough Council is currently producing a new Local Plan to guide development in the borough from 2020 to 2038. In producing this Local Plan, the Borough Council is expected, as a minimum, to meet the area's housing needs, as well as accommodating any unmet needs from neighbouring areas where it is practical to do so, unless this would clearly conflict with other national policies, notably those for the protection of areas or assets of particular importance.
- 1.2 The determination of housing needs, both overall and for particular groups, is considered in a separate 'Housing Needs Assessment Topic paper.
- 1.3 The function of this Housing Supply and Trajectory Topic Paper is to identify how the housing needs identified in the Housing Needs Assessment Topic Paper are proposed to be delivered by the Local Plan during the Plan period.
- 1.4 As such, this Paper addresses the need to provide a sufficient supply, with a trajectory for housing delivery across the borough, based on a clear and defined phasing methodology, that seeks to ensure a continuous supply to meet overall housing needs. It considers the respective contributions to housing supply from outstanding site allocations in the borough's previous Site Allocations Local Plan (SALP), 2016, extant planning permissions at the base date of the Local Plan (01 April 2020), a robust allowance for "windfall" sites, as well as proposed new site allocations. Additionally, this paper will provide an overview of the Council's current five-year housing land supply and housing delivery test positions.
- 1.5 In turn and drawing on a number of studies, this Paper addresses the housing needs of particular groups, or forms of housing provision, identified in the Housing Needs Assessment Topic Paper, these being:
- Affordable Housing
 - Housing for Older People
 - Housing for People with Disabilities
 - Self-Build and Custom Housebuilding
 - Gypsies, Travellers, and Travelling Showpeople
 - Small and Medium Sites
- 1.6 Attention is also drawn to the Borough Council's Development Strategy Topic Paper which explains the basis of the development strategy being put forward in the Pre-Submission Local Plan and the Strategic Housing and Employment Land Availability Assessment (SHELAA) that assesses potential sites for residential development.

2.0 Regard to the National Policy Background

- 2.1 The National Planning Policy Framework (2019; NPPF) ([view the NPPF](#)) is clear in expecting Local Plans to ‘*positively seek opportunities to meet the development needs of their area*’ (paragraph 11). It adds that, “*to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*’ (paragraph 59)
- 2.2 The NPPF emphasises that “*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*’ (paragraph 67). Moreover, ‘*planning policies should identify a supply of:*
- a) *specific, deliverable sites for years one to five of the plan period; and*
 - b) *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*”
- 2.3 Indeed, all sites submitted through the Council’s call for sites process (from both call for sites stages 1 and 2, late site submissions until 22 February 2019, further site submissions post-22 February 2019 and prior to the Regulation 18 consultation, new site submissions received during the consultation, and further site submissions post-consultation up until June 2020) have been thoroughly assessed in terms of their availability, suitability, likely economic viability, and general sustainability as part of the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) work.
- 2.4 The sites considered potentially suitable to contribute toward the borough’s housing supply during the Plan period, and hence to meeting its housing needs identified in the Housing Needs Assessment Topic Paper, have where appropriate been put forward for allocation in the Local Plan. This Housing Supply and Trajectory Topic Paper, in-turn, will therefore outline how these sites, in conjunction with already identified sites and small sites, will meet both the overall housing need and contribute to meeting those of particular groups within the borough, as identified in the NPPF. Informing this, extensive housing trajectory work has been carried out by the Council, as discussed further on within this Topic Paper, which ensures that a consistent and reliable supply of housing is to be delivered throughout the Plan period.
- 2.5 Furthermore, the NPPF also requires Plans to promote small and medium sized sites as a means of meeting the housing requirement of an area to ease over-reliance on large sites that often take time for delivery to start. As such, local planning authorities should aim to ‘*identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through*

the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved' (paragraph 68). The Local Plan will consequently seek to address this through new site allocations, a small sites windfall allowance, and extant planning consents as at 01 April 2020. This is further discussed in this Housing Supply and Trajectory Topic Paper as a particular housing need that the Plan must take into account.

- 2.6 The NPPF also notes that *where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply ... having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'* (paragraph 70). Windfalls, defined as non-allocated sites in a Development Plan but which may come forward through the planning process during the Plan's period, have provided an important contribution to housing supply in the borough over the preceding decade. There is compelling evidence that windfalls will continue to provide a reliable source of supply through the Local Plan period and is set out further on within this Topic Paper, including an identification of a realistic projected delivery from such sites (including on both small (less than 10 dwellings) and large (10 or more dwellings) windfall sites).
- 2.7 In addition to small and medium-sized sites, the NPPF recognises that larger scale development, such as new settlements or significant extensions to existing villages and towns, may also achieve a sufficient contribution to housing supply *"provided they are well located and designed, and supported by the necessary infrastructure and facilities"* (paragraph 72). As outlined within the Council's Development Strategy Topic Paper, the Council has considered and is promoting a development strategy that incorporates plans for a new garden settlement and major urban extension in the north of the borough outside of the High Weald Area of Outstanding Natural Beauty (AONB). These proposed large developments have been appropriately taken into account in the Council's work on the trajectory, and consequently this Topic Paper, to be discussed further on.
- 2.8 With regard to maintaining supply and delivery within a Plan, the NPPF makes clear that *"strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites"* (paragraph 73). Indeed, the trajectory work carried out by the Council and outlined further on within this Topic Paper is underpinned by a delivery and phasing methodology, also explained in detail further on. This methodology builds on local historic rates of delivery for the Tunbridge Wells borough, data from national studies and data from the Letwin Review (2018), as well as developer consultation responses.
- 2.9 The trajectory work, to be updated annually, also underpins the NPPF's requirement of identifying *"a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against [the identified] ... housing requirement set out in adopted strategic policies"* (paragraph 75) as well as for the purpose of meeting the Housing Delivery Test (based on past three years' delivery; paragraph 75). In

addition, the Planning Practice Guidance on Housing Supply and Delivery (last updated 22 July 2019) makes clear that “a 20% buffer on a local planning authority’s 5-year land supply [is added] ...if housing delivery falls below 85%” with a “presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements set out in paragraph 215 of the Framework’ (see [Housing Supply and Delivery: Paragraph 042 Reference ID: 68-042-20190722](#)).

3.0 Local Policy Background

Local Plan housing targets

- 3.1 The Council's Core Strategy 2010 ([see Core Strategy](#)), informed by the findings of the then adopted South East Plan, identified a local housing need of 6,000 net additional dwellings to be delivered during the period 2006-2026 (300 net per annum). However, since the publication of the 2014 household projections and the Government's standard method as a means of calculating a local authority's objectively assessed housing need, the annual housing requirement for the borough has more than doubled (to 678 per annum).
- 3.2 It should also be noted that, although newer household projections have been released by the Government in 2016 and 2018, the 2014 household projections are to be used when calculating the objectively assessed need via the standard method unless required otherwise by the Government. This is further explained in the Planning Practice Guidance (see [Housing and Economic Needs: paragraph 005 Reference ID: 2a-005-20190220](#)) which states that *'the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes'*. It is further added that *"any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in [paragraph 60 of the National Planning Policy Framework](#) ... it is not considered that these projections provide an appropriate basis for use in the standard method'* (paragraph 015 Reference ID: 2a-015-20190220).
- 3.3 Based on submission of the Local Plan in 2021 and using household projections from 2020 to 2030, the local housing need for the borough over the plan period to 2038 is confirmed as 12,204 dwellings (678 per year), identified by the Standard Method as required by the NPPF (paragraph 73; footnote 37). The Council will monitor the impact of new data releases on its objectively assessed housing need and respond as appropriate. Appendix 1 of the Housing Needs Assessment Topic Paper (Application of the Standard Method to assessing the housing need for the Tunbridge Wells borough) details the calculations used to identify the Standard Method housing figure for the borough.
- 3.4 In identifying the amount of further land to be allocated to meet the above housing need figure over the plan period (2020-2038), account is also taken of the fact that, as at 01 April 2020, 3,313 homes had extant planning permission, and 276 can be delivered through existing allocations within the adopted SALP, 2016, which have not yet been implemented). [However, it should be noted that, following further review of such sites for the new Local Plan, the figure of 276 has been superseded by new site allocation capacities.]

- 3.5 As aforementioned, windfalls (i.e. non-allocated sites) have historically provided an important contribution to housing supply in the borough over the preceding decade. As such, based on the findings as discussed in a later section of this Topic Paper, the Local Plan makes allowance for approximately 122 dwellings per annum on windfall sites for 7 years from 2023/24 (made up of a small sites windfall allowance of 98 per annum, and a large sites windfall allowance of 24 per annum), followed by approximately 102 dwellings per annum for the remaining 8 years from 2030/31 (made up of a small sites windfall allowance of 78 per annum, and a large sites windfall allowance of 24 per annum). This equates to 1,670 dwellings over the Plan period. This allowance will be monitored as the Local Plan progresses. Moreover, it should be noted that this number is calculated from 2023/24, to prevent duplicating current extant planning permissions.
- 3.6 **Table 1** below sets out the current position in terms of housing need. It is advised that detailed monitoring of housing delivery completions takes place in April-June of each year, looking at the previous year (from 01 April to 31 March). Therefore, **Table 1** will be updated in due course to reflect the outcome of the monitoring for the year 01 April 2020 to 31 March 2021.

Table 1: Housing Need and Supply 2020-2038 (as at 01 April 2020)

1	Housing need 2020-2038	12,204	18 years x 678 pa
2	Extant planning permissions at 1 April 2020	3,313*	
3	Windfall allowance small sites	1,310	(98 x 7 years) + (78 x 8 years)
4	Windfall allowance large urban sites	360	24 x 15 years
5	Outstanding SALP/Local Plan site allocations	276	
6	Minimum additional allocations to meet need	6,945	= Row 1 – rows (2-5)
7	Minimum total allocations	7,221	Rows 5+6

* Includes discounting for C2 permissions

- 3.7 The Council will therefore seek to meet its objectively assessed housing need, including through additional allocations as set out above. It has also had regard to the potential to meet unmet needs from neighbouring authorities, in line with the NPPF, although it is evident from the assessment of potential sites through the SHELAA that the adverse environmental impacts of this would be unduly large.
- 3.8 The housing trajectory (discussed further on) demonstrates in detail how the objectively assessed housing need for the borough will be met. Sites will be allocated to meet the identified needs across the borough in accordance with the Spatial Strategy of the Local Plan.

Five-year housing land supply

- 3.9 The Local Plan housing target is currently 678 dwellings per annum, which is based on the Standard Method housing target as of the base date of the Plan (i.e. 01 April 2020). While the Standard Method target for the purpose of calculating the five-year housing land supply has differed in recent years (e.g. was 682 per annum from 01 April 2019 in the 2018/19 Five-Year Housing Land Supply statement), the latest five year housing land supply target for 2019/20 reflects the Local Plan target (i.e. 678 per annum). It should be noted, however, that the five-year housing land supply target may be different to the Local Plan target of 678 for the 2020/21 statement as the target will use 2021 as the base date, rather than 2020. Despite this, once the new Local Plan is adopted, all subsequent five-year housing land supply positions will aim to meet the 678 dwellings per annum (based on the 2020 Local Plan base date) throughout the Plan period to 2038.
- 3.10 The Council recently updated its five-year housing land supply position for 2019/20 which identified that the Council, inclusive of a 5% buffer as determined by the Housing Delivery Test, does not have a five-year housing land supply, but rather 4.83 years. Detailed information including the calculations made in order to reach this conclusion can be found in the Council's Five Year Housing Land Supply Statement (see [Five-Year Housing Land Supply 2019/2020](#)).

Housing delivery test

- 3.11 As aforementioned, the Council is required to meet the government's Housing Delivery Test as a means to ensure that housing delivery is meeting identified need over the past three years within the borough. The identified need is based on the government's standard method (capped at a 40% increase as part of the affordability ratio aspect of the calculations for the five-year housing land supply and Local Plan target).
- 3.12 The Council's current position on the Housing Delivery Test is shown in **Table 2** below. This indicates that for 2020, the housing delivery requirement was 1,807 (which included a reduction in the target for the latest year (2019/20) equivalent to 1 month to take into account the temporary disruption to local authority planning services and the construction sector caused by the UK's first national lockdown announced on 23 March 2020 in response to the Covid-19 pandemic), whereas the delivery in the borough was at 1,540, meaning that the Council was achieving 85% of its requirement. The consequence of this, as per the Planning Practice Guidance, is that the Council has to provide a 5% buffer on its five-year housing land supply (taken into account in preceding sub-section) as well as produce an Action Plan ([see Housing Delivery Test Action Plan 2018/19](#)) outlining ways in which delivery will be improved in the forthcoming year(s).

Table 2: Tunbridge Wells housing delivery test results 2020

Requirement			Total	Delivered			Total	HDT measure	HDT impact
17/18	18/19	19/20		17/18	18/19	19/20			
494	688	624	1,807	513	553	474	1,540	85%	Action Plan

Neighbourhood plans

- 3.13 As of January 2021, the only parish in the borough to have a ‘made’ Neighbourhood Development Plan (NDP) is Hawkhurst. However, there are a number of parishes developing NDPs for their areas with the consequent likelihood that there will be an increasing number of NDPs adopted throughout the Local Plan period.
- 3.14 Although there is no statutory requirement to do so in an NDP, the NPPF states that *‘neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area’* (paragraph 69). Moreover, the NPPF clarifies that these should not contradict any adopted strategic policies (i.e. which should be identified as such in the Local Plan) and such housing figures should therefore *‘not need retesting at the NDP examination, unless there has been a significant change in circumstances that affects the requirement’*. (paragraph 65).
- 3.15 Consequently, during the Plan period and notwithstanding the allocations being put forward across the borough in the Local Plan, there is an opportunity for NDPs to also allocate small and medium sized sites in their respective areas. Should any NDP allocate sites and hence become part of the development Plan, the housing delivery and trajectory figures will be updated accordingly in subsequent annual housing land supply reviews.

4.0 Housing Delivery Phasing and Build-out Rate Methodology

Introduction: housing delivery phasing and build-out rate methodology

- 4.1 The Council is committed to taking a proactive approach to housing delivery in the borough and continually engages with the development industry and other delivery partners. As part of the annual requirement for local authorities to identify a five-year housing land supply, the Council annually monitors the progress of housing completions and future supply taking into account sites with extant planning permission, sites allocated in the latest adopted Plan (i.e. the SALP (2016)), and windfall sites.
- 4.2 As part of this monitoring, the Council is also required to carry out and publish its assessment of when housing is expected to be built as part of the new Local Plan trajectory (taking into account extant planning permissions and completions from the base date of the Plan, new site allocations (once adopted), and a windfall allowance).
- 4.3 The Council has produced this Housing Delivery Phasing and Build-Out Rate Methodology to help inform the annual assessment for the five-year housing land supply, as well as the new Local Plan trajectory, as to when housing in the borough can realistically be expected to be built.
- 4.4 This section sets out the current processes the Council undertakes annually to gain information from developers, independent housebuilders, landowners, planning agents and other planning applicants. This section also explains the method of assessment used for when it has not been possible to obtain data from the development industry. This process provides a set of parameters and assumptions, based on the type and size of housing sites, which show how the Council will assess delivery of new homes. This will inform the Council's Housing Delivery Phasing and Build-Out Rate Methodology.
- 4.5 The methodology sets out:
- When a site is considered deliverable in the context of the NPPF;
 - A review of national studies on delivery and local evidence;
 - A set of assumptions related to lead-in times to be used in the five-year housing land supply assessment; and
 - A set of assumptions related to build-rates to be used in the five-year housing land supply assessment.

National studies on building rates

- 4.6 There are several nationally recognised evidence studies on lead in times and the phasing of construction projects. These include:
- [Independent Review of Build Out Rates: Annexes: Ministry of Housing, Communities and Local Government](#) (Letwin Review (2018));
 - [Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?](#) (Lichfields, 2016);
 - [Housing Supply Research](#) (Parsons Brinckerhoff for CPRE (2014));
 - [Permissions to Land: Busting the myths about house builders and land banking](#) (HBF (2014));
 - [Urban Extensions Assessment of Delivery Rates](#) (Savills (2014))
- 4.7 From these evidence studies several key pieces of information about national housing delivery rates can be derived:
- Outline planning permissions and any associated S106 agreements result in the greatest amount of time between permission being granted and completions starting on site;
 - The greater the number of dwellings to be delivered on site, the greater the overall lead in time before construction starts on site; however, once construction starts, large sites tend to deliver a greater number of completions more quickly;
 - Smaller sites or medium sites that go straight to full planning permission tend to have a shorter lead in time prior to construction but completions accrue at a slower rate than on larger sites; and,
 - Sites that feature affordable housing and other tenure products can lead to an increase in the overall level of completions seen.
- 4.8 The most recent of these studies, the Letwin Review (2018), has made some interesting comments on completion rates within the housing sector. The review identified two major constraints that currently affect the housing sector:
1. The current lack of diversity in both house type and tenure currently found on larger building sites. It is believed that despite nationally high housing delivery targets that this is limiting the rate at which the housing market will absorb new units.
 2. The construction industry. It is thought that if build-out rates increase nationally then there may be a “significant biting constraint” on the construction industry’s ability to meet this increase in terms of both labour and materials.

- 4.9 While these national evidence base studies are useful and may present a reliable picture nationally, their findings cannot necessarily be applied at the local authority level and it is important to acknowledge their limitation, including:
- It is challenging to draw comparisons between studies due to the variety of sites examined and the period over which the development process was reviewed; and,
 - The use of average timescales across the studies can also mask significant local variances which may impact on local housing delivery rates.
- 4.10 To inform the conclusions on buildout rates made within this document several sources of local evidence have been used. These have included analysis of the gap between historic permissions granted and historic site buildout rates across the borough, discussions with developers, and evidence gathered as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Historic build-out rates, permissions granted and development management performance

- 4.11 The Council has access to historic data on planning permissions granted for housing and housing completions within the borough from which conclusions can be drawn using this data on the average build-out rates across the borough.
- 4.12 **Figure 1** below displays this historic data and compares annual housing completion rates against the number of housing units approved through planning permissions each year.

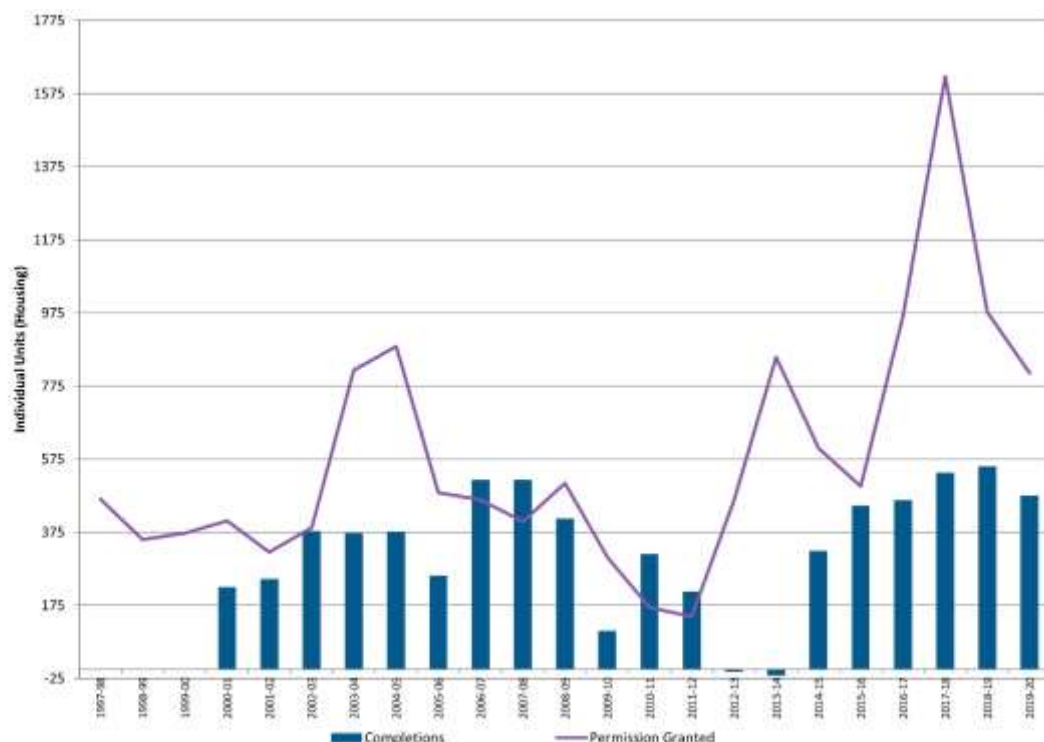


Figure 1: Annual Housing Completions and Permissions Granted for Housing

- 4.13 **Figure 1** shows that there has been a significant rise in the number of new dwellings committed through the granting of new planning permissions, in some instances following allocations made through the adopted SALP (2016). This should lead to an increase in the number of dwellings delivered but this will require commitment from the development industry to deliver these new dwellings. The time taken for these dwellings to appear as physical completions (following the grant of planning permission) largely depends on the current build-out rates across the borough.
- 4.14 Using the historic completions data discussed above it is possible to calculate the average length of time between planning permission being granted, completions starting on site and completions finishing on site. To calculate these figures a sample size of 1,090 planning applications across 11 years was used. To increase the statistical robustness of the dataset 42 outlying values were removed; this resulted in a final sample size of 1,048 planning applications across 11 years. **Figure 4** below displays information on the average amount of time (in years) between a planning permission (either outline, full or hybrid) being granted and completions starting and finishing on site. The average rate has been calculated for the sites across the borough and at a variety of different scales which are detailed below.

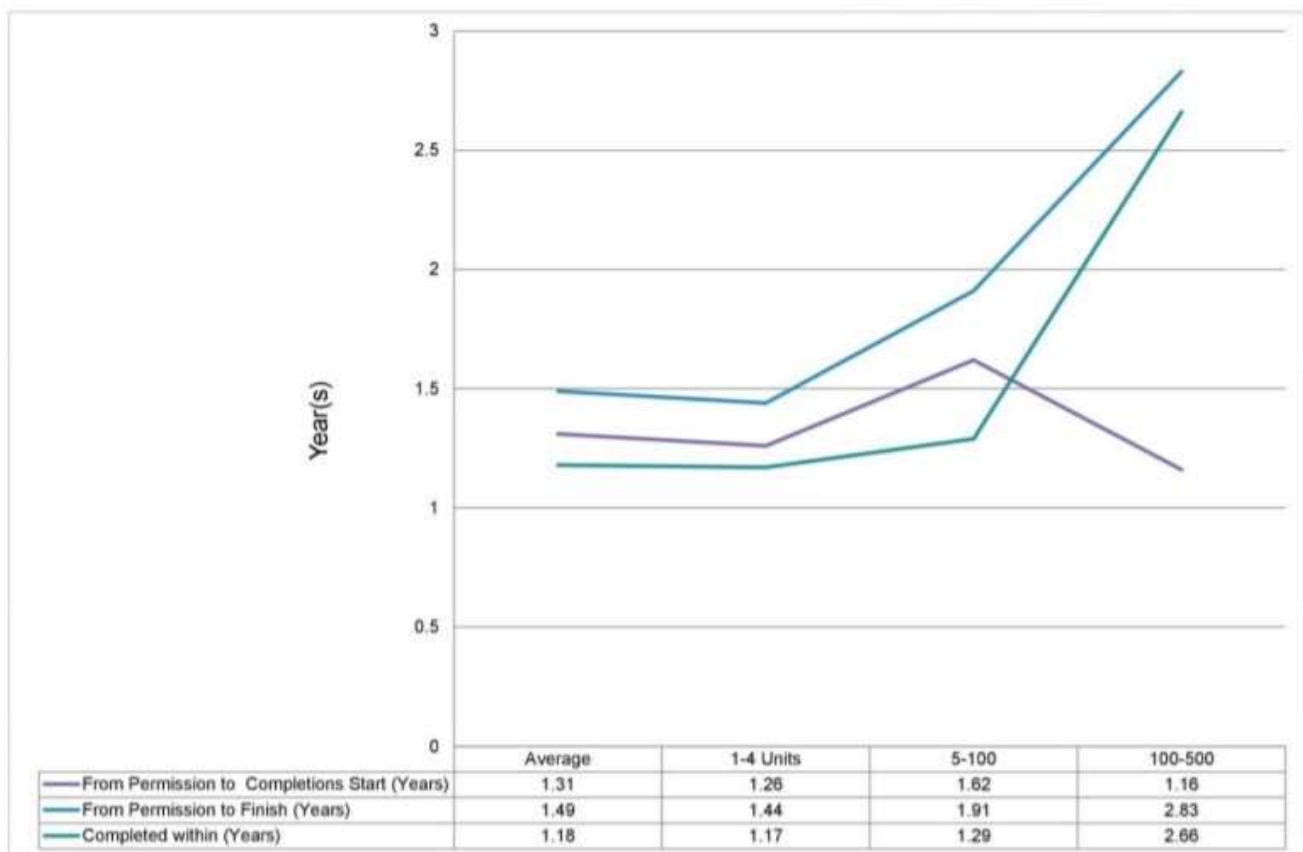


Figure 2: Average (Mean) Construction Rates Across the Borough

- 4.15 **Figure 2** displays some interesting trends in the time taken for construction across sites within the borough. The patterns are on the whole as national evidence would suggest and the length of time taken for each stage increases as the size of site gets larger. A notable anomaly is the length of time between permission being granted and the start of completions on site (the purple line in **Figure 2**) when sites of 5-100 dwellings are compared to sites of 100-500 dwellings, the length of time spent at this stage appears to decrease once a site reaches a certain size. It is possible that by the time larger schemes are approved that developers have already invested significant resources into a site, have developed detailed construction designs further (including those to discharge conditions) and have entered into considerable dialogue with TWBC. It is also plausible that developers/house builders involved in larger schemes have more resources and experience available to them and are therefore able to implement planning permissions swiftly.
- 4.16 While the data above has been cleaned to increase its statistical reliability, it is important to consider that this may have removed some important data points that illustrate local variances in buildout rate. To ensure that any impact that these points may have had on overall trends the original dataset was also analysed. The same patterns evident in the cleaned data appeared but the peaks and troughs were more pronounced. **Appendix 1** shows both the findings from the original dataset and the dataset after it had been cleaned.
- 4.17 In addition to the evidence discussed above, TWBC considers that, as an LPA, it promotes practices and procedures which help to facilitate shorter lead-in times. These measures include encouraging hybrid applications, ensuring that there is consistency in the resource at TWBC responsible for particular sites/developments, pro-actively engaging with consultees (responsible for advice on the discharging of planning conditions) and infrastructure providers and ensuring there is clear and ongoing communication with developers. The pre-application process is well used by developers and seeks to resolve potential issues ahead of the submission of a planning application. For major developments in particular, this includes the LPA encouraging developers to engage with local residents, businesses and relevant organisations.
- 4.18 The Council has also committed to implementing the use of planning performance agreements and providing new additional resources for the determination and delivery of strategic sites and the discharge of planning conditions for small, medium and major development sites. These procedures help to create the ideal environment for accelerating housing delivery and therefore the Council can be confident in achieving expedited lead-in times and build-out rates.

Evidence gathered through the Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 4.19 The Council has considered and prepared evidence on building rates and lead in times as part of the new Local Plan preparations. As part of the site allocations process there has been significant dialogue with site promoters and developers on the expected build-out rates achievable at a variety of allocation sites across the borough.
- 4.20 Information on site expectations, availability, predicted start and finish times has been collected for all sites allocated through the SHELAA.
- 4.21 Where phasing information has not been provided by developers/homebuilders the data collected can be used as evidence to help to guide the predicted build-out rates of other developments across the borough.

Discussions with developers and house builders

- 4.22 Further to the discussions held with site promoters through the SHELAA process additional meetings have been held with developers and house builders to determine expected buildout rates across the borough.
- 4.23 The Council will further engage with representatives from the local development industry to review the past and future progress of housing delivery. The key aim of this engagement will be to identify any barriers to housing delivery and to gain first-hand experience of lead-in and build-out times in the current housing market.
- 4.24 Using evidence gathered by other local authorities and both local and national evidence studies the Council produced a list of assumptions which it will ask local developers to comment on:
- Preparation and approval of both Outline and Reserved matters can take the same amount of time for planning approval – circa. one year;
 - Full Committee agendas, elections and other political influences can impact on planning approval timescales;
 - From permission to first completions can on average range from 1.26-1.62 years depending on size of site;
 - Approval periods can be as short as 99 days on average for housing applications in Tunbridge Wells (Source; approvals between April 2006- March 2018);

- Discharge of conditions for housing permissions can affect starts on site and completions: timescales for discharge of conditions from receipt are likely to improve after the appointment of a Conditions Officer;
- Judicial Reviews, Appeals and Call-ins all add significantly to lead-in times;
- Land assembly is a key stage in larger sites, potentially adding up to 6 months to lead-in times. Timescales are much shorter when the developer owns a site at outline stage;
- Site preparation works and discharging of conditions are likely to overlap on larger sites, reducing lead-in times; and
- Materials and labour availability can affect delivery rates once consent is granted.

4.25 The information gathered from national and local evidence base studies has also been used to inform how the Council intends to phase housing sites within the five-year housing land supply. It is intended that this will be updated following consultation with developers.

4.26 The following section sets out the parameters and assumptions to be used when direct information cannot be obtained from the developer of a site, or when the Council considers it needs to review the information submitted.

Assumptions made

4.27 The following section sets out which year within the housing land supply the Council considers completions will occur on particular sizes of site based on the stage in the delivery process reached in the monitoring year.

4.28 The types and scales of site size have been selected to reflect both the anticipated new Local Plan allocations and those historically coming forward as planning applications. The site sizes are also comparable to those used in the most-referred-to national studies, which allows for comparison between national averages and the local delivery picture. The Council's data in the previous section does not include information on sites greater than 500 units because there are not currently any sites that fall within this category that have progressed through the planning system.

Smallest sites (less than five dwellings)

4.29 The smallest category of site considered in this document is those smaller than five new net dwellings. For these dwellings the following assumptions will be applied:

4.30 Completion is assumed to be within five years, normally within two years;

- If a site is recorded as under construction, it will be phased as complete the following year. For any conversions or subdivisions losses will be recorded alongside gains;
- If construction on a site has stalled/been delayed, then the site will be phased into years three, four or five. The year that a site is phased into will be determined by any recent planning activity on the site;
- Those sites which gained full planning permission in the year before the most recent monitoring year, and which have not yet been implemented, will be phased into year 2. Those sites which gained full planning permission within the most recent monitoring year, and which have not yet been implemented, will be phased into year 3;
- Sites with outline permission only will be phased in year two or three (dependent on the discharge of conditions) until full permission is obtained, they will then be treated as a full application;
- If demolition is included within a proposal this is assumed to occur in year one with completions occurring in year two. If demolition does not occur within year one then completions will be phased one year after demolition; and,
- All sites with planning permission will be phased before the expiration date of the permission unless evidence suggests otherwise. If there is evidence that suggests that construction will not be implemented prior to the expiration of an application, then the site will be removed from the five-year supply.

Table 3: Smallest Sites (Less Than Five Dwellings) Phasing Assumptions (Shading Indicates Construction Start)

Completion within:	Year 1	Year 2	Year 3	Year 4	Year 5
Demolition occurred					
Under construction					
Demolition not occurred (if applicable)					
Full permission					
Outline permission					
No planning activity					

Small sites (five to 99 dwellings)

4.31 The following assumptions have been made about sites between five and 99 dwellings in size:

- Completion is assumed to be within five years of permission being granted, unless information suggests otherwise; for example, if there has been no further planning progression on an outline permission only;
- Sites recorded as under construction in the preceding year will be phased as complete in the following year unless evidence suggests otherwise. If a site is at the larger end of the scale (i.e. 60-100 units) and it is unrealistic that all completions will occur within a year, then completions may span over two monitoring years;
- Sites with outline permission only will be phased in year two or three (dependent on the discharge of conditions) until full permission is obtained; they will then be phased as a full application;
- As with smaller sites, if demolition is included within the proposal then it is assumed that demolition will occur in year one with completions occurring in year two. If demolition does not occur within year one, then completions will be phased one year after demolition;
- If construction on a site has stalled/been delayed, then the site will be phased into years three, four or five. The year that a site is phased into will be determined by any recent planning activity on the site; and,
- All sites with planning permission will be phased before their expiration date unless evidence suggests otherwise. If there is evidence that suggests that construction will not be implemented prior to the expiration of a permission, then the site will be removed from the five-year supply.

Table 4: Small Sites (Five to 99 Dwellings) Phasing Assumptions (Shading Indicates Construction Start)

Completion within:	Year 1	Year 2	Year 3	Year 4	Year 5
Demolition occurred					
Under construction					
Demolition not occurred (if applicable)					
Full permission					
Outline permission					
Awaiting S106					
Planning activity					
No planning activity					

Medium sites (100 to 500 dwellings)

4.32 The following assumptions have been made about sites between 100 and 500 dwellings in size:

- Leading national evidence studies both give an average of 2.5 years from submission of a planning application to construction beginning. The phasing assumptions used within this document are from the point of full approval of an application. Sites with outline permission only will therefore be phased to deliver in year three to reflect the findings in national evidence base studies;
- The national evidence base studies suggest that sites of around 100-500 dwellings take approximately 18 months from approval to completions starting on site. It will therefore be assumed that for full planning permission that completions will start on site 18-24 months after approval (in year two/three dependent upon monitoring periods);
- Local Plan allocations of this site size that are subject to a planning application will be phased similarly to either when consent has been granted, or, if no form of permission exists, the phasing will be dependent on the status and progression of the current application; and,
- Local Plan allocations of this site size that have no form of consent may potentially be phased out of the five-year period and it will be assumed that completions will be in year 6 at the earliest depending on the level (if any) of planning activity occurring. This is unless there is clear evidence on the contrary which indicates that completions can be expedited on the site.

Table 5: Medium Sites (100 to 500 Dwellings) Phasing Assumptions (Shading Indicates Construction Start)

Completion within	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6+
Full planning permission – under construction						
Full planning permission – construction not started						
Full planning permission – S106 Stage						
Outline permission						
Outline – S106 Stage						
Planning activity						
No planning activity						

Large sites (501 to 2,000 dwellings)

4.33 The Council does not currently have its own local evidence on the appropriate phasing strategy to apply to large sites (501 to 2,000 dwellings). The Council will therefore use national evidence and other local evidence to inform its phasing assumptions as follows:

- Sites of over 500 dwellings are most likely to form the strategic sites allocated within the new Local Plan. Past experience of planning consents both nationally and locally has shown that larger sites typically secure outline/hybrid applications followed by separate reserved matter applications for individual parcels. This phasing focuses on those applications at outline consent stage. Once smaller reserved applications are received, parcels will be treated individually (i.e. as medium-sized sites);
- If outline consent has been granted and no further information has been provided, then sites will be phased to begin construction in year 3/4 to account for any delay in land transfer to the house builder(s)/developer(s). Sites of this size often have multiple organisations involved and complex land ownership issues to overcome;
- With limited local evidence, conclusions must be drawn from national and other local studies which suggest that lead-in times from outline or hybrid consent to first completions is around 18 months; and,
- Strategic sites with a current planning application under consideration will be phased according to the progress of the planning application.

Table 6: Large Sites (501 to 2,000 Dwellings) Phasing Assumptions (Shading Indicates Construction Start)

Completions within:	Year 1	Year 2	Year 3	Year 4	Year 5
Outline permission					
Outline at S106 Stage					
Outline under construction					
Allocated site – planning activity					
Allocated site – no planning activity					

Super-size sites (2,000 plus dwellings)

4.34 The Council does not currently have any sites that fall within this category (allocated sites nor extant planning permissions); however, garden settlement and major urban extension proposals in the Local Plan, subject to public consultation, would fall within this category. The Council does not currently have its own local evidence on the appropriate phasing strategy to apply to sites of more than 500 dwellings. The Council will therefore use national and other local evidence to inform its phasing assumptions as follows.

4.35 It is likely that for sites of this size the Council will have detailed phasing information from the applicant/developers. In the instance where the Council does not have access to phasing information the following assumptions will be made:

- Delivery can start relatively quickly from the granting of outline permission. Generally, in an application of this scale, difficult issues are resolved during the planning approval or via a master plan process;
- The phasing of sites at S106 negotiation stage or with planning applications still under consideration (with no resolution to grant) are phased in year five to reflect the longer planning approval time for outline consent needed for super-sized sites; and,
- Local Plan Allocation sites with no outline consent will generally be phased outside of the five-year period to reflect the longer planning approval time required for super-sized sites. This is unless there is evidence provided that indicates otherwise.

Table 7: Super-Size Sites (2,000 Plus Dwellings) Phasing Assumptions (Shading Indicates Construction Start)

Completions within:	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Outline permission							
Outline at S106 Stage							
Outline under consideration							
Allocated site – planning activity							
Allocated site – no planning activity							

Phasing conclusion (applicable to all sites)

- 4.36 The phasing assumption details provided in this section are designed to be generic but reflective of the local housing market. It is not expected that these will be applied to every scheme but instead provide a set of clear assumptions that can be applied to other schemes where developers or housebuilders have not been forthcoming with information. It is hoped that developers and housebuilders will engage with the Council and provide detailed delivery information in response to the annual housing monitoring. If the Council identifies that sites within the housing land supply are subject to extenuating circumstances whereby delivery will be accelerated or delayed unexpectedly it will seek clarification from developers and housebuilders.
- 4.37 The annually produced Five-Year Housing Land Supply Statement is a document that is produced at a particular point in time and therefore the findings presented within it are subject to change throughout the year. The Council will update its Five-Year Housing Land Supply Statement annually, but it is important to consider that there may be unexpected changes in the local housing market after the statement is published and any subsequent changes will be addressed the following year.
- 4.38 The following section expands on the historic build-out rates discussed above and sets out the generic build-out rates that the Council will apply where direct information is not provided or when it is deemed necessary to sense-check data.

Build-out rates

- 4.39 There is known to be a direct correlation between local housing market performance and the level of new homes delivered in an area (build-out rates). It is considered that Tunbridge Wells has a strong housing market particularly in comparison to the wider housing market area ([Tunbridge Wells Strategic Housing Market Assessment Update \(2017\)](#) page 34).
- 4.40 There is national evidence (Nathaniel Lichfield & Partners 2017) ([view Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?](#) (Nathaniel Lichfield & Partners (November, 2016)) pages 18 to 19) to suggest that there is little difference in overall lead in and delivery times between greenfield and brownfield sites. The assumptions included therefore cover both types of site.
- 4.41 National studies have shown that, on sites where 30% or above affordable housing is proposed, build-out rates fall within the higher end of the national average (Nathaniel Lichfield & Partners (2016); NLP; see [Start to Finish](#)). Sites proposed to be allocated through the new Local Plan will be required to have between 30% (on brownfield land) and 40% (on greenfield land) affordable housing. Once planning permission has been secured for affordable housing on these sites, the appropriate build-out rates will be applied.

- 4.42 The national studies referenced at the start of this document state that there have been many urban extensions in the south of England where delivery rates have exceeded 120 units per annum. Where urban extensions have been proposed through the new Local Plan, and evidence presented clearly demonstrates that the proposed allocation may deliver at a higher delivery rate than national studies suggest, these higher delivery rates will be applied.
- 4.43 National evidence suggests that sites will exhibit lower completions in their first and second years before construction on the site becomes established at which point the number of dwellings constructed a year stabilises at an increased level. The level of housing delivered on site in the final year of construction may be reduced while schemes are finished and other areas of construction are completed (e.g. landscaping etc.).
- 4.44 Large and super-size sites are likely to experience delivery in peaks and troughs due to changing conditions throughout construction. As a result, some years will exhibit high levels of completions and some years will be lower; this will be dependent on the number of outlets involved in construction and the planning stage at which the site is at. Any build-out rate assumptions made by the Council will take into account these delivery cycles.

Table 8: Build-Out Rates (Per Annum)

Site size	Local evidence on peak build-out rates (TWBC historic records)	Average annual potential yield (NLP (2016))	Average annual potential yield (Letwin Review (2018))	Local developers	TWBC proposed delivery rates
1-4 units	Up to 4, average 4	4	No data	TBC	4
5-99 units	Up to 96, average 44	27	No data	TBC	44
100-199 units	Up to 122, average 62.5	Circa. 60	No data	TBC	70
200-299	Up to 77, average 36.8	Circa. 60	No data	TBC	70
300-399	Up to 104, average 56.8	Circa. 60	No data	TBC	70
400-499	No data	Circa. 60	No data	TBC	70
500-999	No data	Circa. 68, up to circa. 125	61*	TBC	70
1,000-	No data	Circa. 120, up to circa.	128**	TBC	128

Site size	Local evidence on peak build-out rates (TWBC historic records)	Average annual potential yield (NLP (2016))	Average annual potential yield (Letwin Review (2018))	Local developers	TWBC proposed delivery rates
2,000		205			
2,000+	No data	161, up to circa. 310	299***	TBC	299

*This is based on a median 6.1% build-out rate on sites in the Letwin Review (2018) of size 0-999 units (however note that the dataset used only had data for sites of 500 units or more; see [Annex AX36](#)).

**This is based on the average annual build-out rate of case study sites in the Letwin Review (2018) of sites between 1,000-2,000 units (see [Annex AX26](#)).

***This is based on the average annual build-out rate of case study sites in the Letwin Review (2018) of sites above 2,000 units (see [Annex AX26](#)).

4.45 The build-out rates above have been obtained from historic records (details in **Appendix 2**), national studies ([NLP \(2016\)](#)), Letwin Review (2018) analysis (see [Independent Review of Build Out Rates: Annexes: Ministry of Housing, Communities and Local Government](#)), and supplied directly from developers and housebuilders. In evaluating the range of values presented across the site sizes in **Table 8**, the proposed delivery rates in the far-right column are considered the most appropriate to use for the purpose of producing the housing trajectory.

4.46 As a means of calculating the expected build-out rates in the trajectory as outlined in the following section of this paper, it is proposed that for developments that are of between 1 and 4, and 5 and 99 units in size, the average annual build-out rates based on local historic evidence are to be used (4 and 44, respectively). Although there is no data available for sites under 500 units (as per the data set used) in the Letwin Review (2018), nor local evidence for developments between 400 and 499 units, it is proposed that 70 units per annum are expected to be delivered for all schemes of which would provide a total of between 100 and 499 units on that site. This is considered appropriate based on historic evidence from developments outlined in **Appendix 2**, with the exception of what, in relation to data in other years, can be considered anomalous data during 2011-12 and 2013-14 where only 31 and 12 units were delivered in their respective years on sites between 100 and 500 units. Excluding these anomalies, an average of 77 units per annum have historically been delivered locally on sites of this size; as a result, 70 per annum is considered appropriate as a means of calculating an estimated delivery per annum in the Local Plan housing trajectory.

4.47 Although there is no local historic data for sites of between 500 and 999 units, data from national studies indicates that an average of approximately 68 units, up to approximately 125 (maximum delivery), are delivered per annum, with the Letwin

Review (2018) indicating that 61 units per annum may be delivered on sites of this size. However, taking into consideration the national studies/Letwin Review (2018) indicating that sites of more than 1,000 units deliver a much higher annual figure, it may be considered that sites of between 500 and 999 units deliver at a faster rate than those below 500 units. However, to prevent over-estimation, and taking into account the lack of local historic data, it is proposed that the figure of 70 per annum (as proposed for sites of between 100 and 499 units) is also applied to those developments between 500 and 999 units.

- 4.48 As aforementioned, both national studies and the Letwin Review (2018) indicate that larger schemes generally have higher build-out/delivery rates than smaller schemes. It is consequently proposed that, due to the Letwin Review (2018) figures falling between the average and upper delivery rates identified in the national studies, these figures (128 for developments of size 1,000 to 2,000; and, 299 for developments of size 2,000 plus) are proposed. However, these delivery rates for larger sites are only indicative and therefore for larger schemes/allocations to be delivered in the Local Plan, further analysis that takes into account more specific site size and other conditions (such as number of housebuilders involved on each site) has been undertaken on expected delivery rates. This is outlined within the following sections on the Local Plan housing trajectory.

Annual monitoring processes

- 4.49 The Council conducts housing monitoring on an annual basis commencing on 01 April every year. During this time newly granted planning permissions for housing from the previous 01 April to 31 March period as well as any extant planning permissions from previous years will be monitored to assess their contribution to the borough's housing supply. Throughout the monitoring process the Council will seek to gain as much direct information from developers as possible.
- 4.50 The methodology detailed in this document sets out how the Council will assess sites within the housing land supply where it has not been possible to obtain direct information or where it considers that information provided needs to be assessed for robustness. The final monitoring and housing land supply statements will be published on an annual basis after monitoring has been completed.

5.0 Local Plan Housing Trajectory

Purpose of the Local Plan housing trajectory

- 5.1 The purpose of the Local Plan housing trajectory is to ensure that there is a sufficient and consistent supply of housing being delivered across the Local Plan period that meets the Plan's housing targets, having due regard to the Government's standard method calculations (based on 2014 household projections). This work will also provide the fundamental evidence base for ensuring that the Council will be able to meet the five-year housing land supply and the Housing Delivery Test requirements over the course of the Plan period.
- 5.2 Moreover, the trajectory will provide the basis for ensuring that the Council will meet certain housing needs in the borough (see following section) as outlined in the Housing Needs Assessment Topic Paper in accordance with national planning policy requirements.

Overview of the Local Plan housing trajectory

- 5.3 The Council's Local Plan housing trajectory, as shown in **Table 9**, provides an indication of the expected housing delivery across the Plan period (2020-2038). This trajectory takes into account all extant planning permissions as at 01 April 2020, new Local Plan site allocations (which includes a number of existing site allocations allocated in the SALP (2016) which have been carried forward), and windfalls when calculating the expected housing delivery over the Plan period by year. The methodology underpinning the phasing and expected build-out rates for the above are outlined further on.
- 5.4 Based on the Council's overall housing target for the Plan period (12,204), the Council, when subtracting extant planning permissions, existing SALP site allocations, and windfalls, must plan for a minimum of 7,221 (balance to allocate) as shown in **Table 1** in the Local Policy section of this paper.
- 5.5 A graphical illustration of the trajectory (of the level of housing delivery expected to be delivered in the Local Plan period) is also provided in **Figure 3**. This shows that the highest rates of delivery are expected at the beginning of the Plan period due to the majority of extant planning permissions phased for delivery early (most of which are phased for delivery within the five-year housing land supply) and with many of the smaller new Local Plan allocations anticipated to start delivering earlier on ahead of the larger strategic sites at Paddock Wood at Tudeley (explained further on).

5.6 With regard to extant planning permissions, it is added that the notably high level of delivery in years 2-3 is also partly a result of the first Covid-19 lockdown having a temporary stalling impact on many of these sites (as the construction industry was temporarily forced to ground to a halt), with the backlog (of those sites initially phased from year 1) consequently expected to be delivered within this period. Beyond this, there is generally a consistent and steady supply of expected delivery from extant planning permissions, allocations, and windfalls throughout the Plan period that will ensure that the housing target of 12,204 dwellings is sufficiently met with an appropriate buffer, equivalent to 8.63% above this target, included.

Table 9: Local Plan Housing Trajectory

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	767	932	990	986	801	885	660	737	686	623	736	733	720	661	598	705	646	391
Cumulative Projected Housing Completions	767	1699	2689	3675	4476	5361	6021	6758	7444	8067	8803	9536	10256	10917	11515	12220	12866	13257
Housing Target	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative Housing Target	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals	
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	Royal Tunbridge Wells	150	175	200	0	0	0	0	0	0	0	0	0	0	0	0	44	44	44	43	0	0	175	
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	-8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-8
AL/RTW 2	Land at the Auction House, Linden Park Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	0	0	100
AL/RTW 4	Land at 36-46 St John's Road	Royal Tunbridge Wells	65	78	90	0	0	-11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-11
AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	0	100
AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	Royal Tunbridge Wells	40	43	45	0	0	0	43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43
AL/RTW 7	Land at former Gas Works, Sandhurst Road	Royal Tunbridge Wells	170	185	200	0	0	0	45	70	70	0	0	0	0	0	0	0	0	0	0	0	0	0	185
AL/RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 9	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	69	69	69	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 9 (C2 discount)	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	-33	-33	-33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 10	Montacute Gardens	Royal Tunbridge Wells	30	30	30	0	0	9	0	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	Royal Tunbridge Wells	45	45	45	0	0	0	0	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	Royal Tunbridge Wells	50	50	50	0	0	0	0	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	50
AL/RTW 13	Turners Pie Factory, Broadwater Lane	Royal Tunbridge Wells	100	100	100	0	0	0	70	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	Royal Tunbridge Wells	25	28	30	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	0	0	0	28
AL/RTW 15	Land at Showfields Road and Rowan Tree Road	Royal Tunbridge Wells	155	155	155	0	0	0	0	0	0	0	70	70	15	0	0	0	0	0	0	0	0	0	155
AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	Royal Tunbridge Wells	120	120	120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60	60	0	120

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	767	932	990	986	801	885	660	737	686	623	736	733	720	661	598	705	646	391
Cumulative Projected Housing Completions	767	1699	2689	3675	4476	5361	6021	6758	7444	8067	8803	9536	10256	10917	11515	12220	12866	13257
Housing Target	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative Housing Target	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals	
AL/RTW 17	Land adjacent to Longfield Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 20	Land at Culverden Stadium, Culverden Down	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30
AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	Royal Tunbridge Wells	80	80	80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	36	80
AL/RTW 22	Land at Bayham Sports Field West	Royal Tunbridge Wells	20	23	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	23
AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	Southborough	16	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SO 2	Land at Mabledon House	Southborough	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SO 3	Land at Baldwins Lane	Southborough	26	26	26	0	0	0	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26
STR/SS 1	The Strategy for Paddock Wood and east Capel	Paddock Wood	3490	3540	3590	0	0	0	0	0	300	300	300	300	300	300	300	300	300	300	300	300	240	0	3540
STR/SS 2	The Strategy for Paddock Wood Town Centre	Paddock Wood	30	30	30	0	0	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30
STR/SS 3	The Strategy for Tudeley Village	Capel	2100	2100	2100	0	0	0	0	0	150	150	150	150	150	150	150	150	150	150	150	200	200	200	2100
AL/PW 1	Land at Mascalls Farm	Paddock Wood	412	412	412	0	0	0	0	1	77	25	0	0	0	0	0	0	0	0	0	0	0	0	103
AL/CRS 1	Land at Brick Kiln Farm, Cranbrook	Cranbrook & Sissinghurst	180	180	180	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	Cranbrook & Sissinghurst	35	40	45	0	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	Cranbrook & Sissinghurst	200	202	204	0	0	34	70	62	0	0	0	0	0	0	0	0	0	0	0	0	0	0	166
AL/CRS 4	Cranbrook School	Cranbrook & Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 5	Sissinghurst Castle Garden	Cranbrook & Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 6	Land south of The Street, Sissinghurst	Cranbrook & Sissinghurst	20	20	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	20
AL/CRS 7	Land at corner of Frittenden Road and Common Road, Sissinghurst	Cranbrook & Sissinghurst	18	18	18	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	767	932	990	986	801	885	660	737	686	623	736	733	720	661	598	705	646	391
Cumulative Projected Housing Completions	767	1699	2689	3675	4476	5361	6021	6758	7444	8067	8803	9536	10256	10917	11515	12220	12866	13257
Housing Target	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative Housing Target	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals	
AL/HA 1	Land at the White House, Highgate Hill	Hawkhurst	42	42	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 2	Brook House, Cranbrook Road	Hawkhurst	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 3	Former Site of Springfield Nurseries	Hawkhurst	24	24	24	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24
AL/HA 4	Land off Cophall Avenue and Highgate Hill	Hawkhurst	70	75	79	0	0	0	44	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75
AL/HA 5	Land to the north of Birchfield Grove	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 6	Sports Pavilion, King George V Playing Fields, The Moor	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 7	Hawkhurst Station Business Park	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 8	Site at Limes Grove (March's Field)	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/BE 1	Land adjacent to New Pond Road (known as Uphill), Benenden	Benenden	18	19	20	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	0	19
AL/BE 2	Feoffee Cottages and land, Walkhurst Road, Benenden	Benenden	25	25	25	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24
AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24
AL/BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	Brenchley and Matfield	45	45	45	0	0	44	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
AL/BM 2	Land at Maidstone Road	Brenchley and Matfield	11	13	15	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
AL/FR 1	Land at Cranbrook Road, Frittenden	Frittenden	25	28	30	0	0	0	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28
AL/GO 1	Land east of Balcomb's Hill and adjacent to Tiddymotts Lane	Goudhurst	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/GO 2	Land at Triggs Farm, Cranbrook Road	Goudhurst	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	Horsmonden	45	50	55	0	0	0	30	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50
AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	Horsmonden	80	90	100	0	0	0	0	0	0	0	0	0	0	0	44	44	2	0	0	0	0	0	90

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	767	932	990	986	801	885	660	737	686	623	736	733	720	661	598	705	646	391
Cumulative Projected Housing Completions	767	1699	2689	3675	4476	5361	6021	6758	7444	8067	8803	9536	10256	10917	11515	12220	12866	13257
Housing Target	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
Cumulative Housing Target	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals	
AL/HO 3	Land to the east of Horsmonden	Horsmonden	115	140	165	0	0	0	0	0	0	0	0	0	0	70	70	0	0	0	0	0	0	0	140
AL/LA 1	Land to the west of Spray Hill	Lamberhurst	25	28	30	0	0	0	0	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28
AL/PE 1	Land rear of High Street and west of Chalket Lane	Pembury	50	55	60	0	0	0	0	0	0	0	0	0	0	44	11	0	0	0	0	0	0	0	55
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	Pembury	80	80	80	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	0	0	0	0	80
AL/PE 3	Land north of the A21, south and west of Hastings Road	Pembury	80	80	80	0	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	0	0	80
AL/PE 4	Land at Downingbury Farm, Maidstone Road	Pembury	25	25	25	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
AL/PE 5	Land at Sturgeons fronting Henwood Green Road	Pembury	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 6	Woodsgate Corner	Pembury	80	100	120	0	0	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	100
AL/PE 6 C2 Discount	Woodsgate Corner	Pembury	-18	-29	-40	0	0	0	0	0	0	0	0	0	0	0	0	-20	-9	0	0	0	0	0	-29
AL/PE 7	Cornford Court, Cornford Lane	Pembury	68	68	68	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 7 C2 Discount	Cornford Court, Cornford Lane	Pembury	-33	-33	-33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 8	Owlsnest Wood, Tonbridge Road	Pembury	75	75	75	0	0	35	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75
AL/PE 8 C2 Discount	Owlsnest Wood, Tonbridge Road	Pembury	-37	-37	-37	0	0	-17	-20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-37
AL/RU 1	Lifestyle Motor Europe, Langton Road	Rusthall	15	15	15	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
AL/SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst	Sandhurst	10	13	15	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
AL/SA 2	Sharps Hill Farm, Queen Street	Sandhurst	10	13	15	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
AL/SP 1	Land to the west of Langton Road and south of Ferbies	Speldhurst	10	11	12	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
AL/SP 2	Land at and adjacent to Rusthall Recreation Ground, Southwood Road	Speldhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total from Allocations						0	0	136	495	440	622	538	604	564	501	634	631	618	559	496	603	544	289	8274	
Windfall Allowance									122	122	122	122	122	122	122	102	102	102	102	102	102	102	102	102	1670
Total from Extant Planning Permissions (01 April 2020)						767	932	854	369	239	141	0	11	0	0	0	0	0	0	0	0	0	0	0	3313

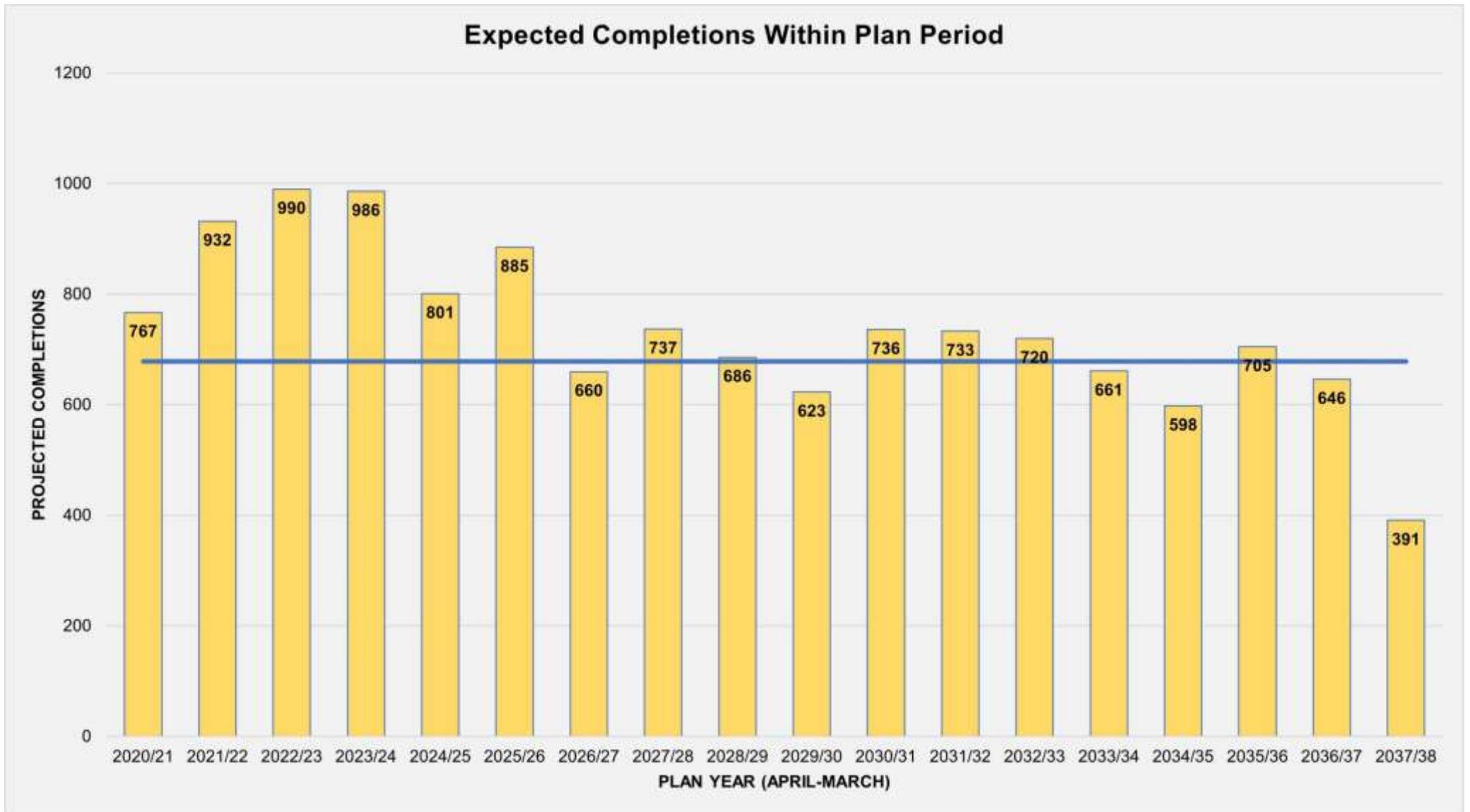


Figure 3: Housing Trajectory Chart: Expected Completions Within Plan Period

Extant planning permissions and C2 discounting

- 5.7 The trajectory above includes housing expected to be delivered from sites that already have extant planning permission for new housing as of 01 April 2020. Details of these sites are set out in the latest Five-Year Housing Land Supply Statement and will be reviewed annually (including phasing and build-out rates). Within the Local Plan period, these extant planning permissions equate to a total of an additional 3,313 dwellings. The phasing and expected build-out rates of these sites is either based on direct information provided from site promoters, house builders and/or developers or, if it has not been possible to obtain this information, the Housing Delivery Phasing and Build-out Rate Methodology set out above.
- 5.8 As discussed below for some site allocations, some extant planning permissions include a discount for Use Class C2 units as a means of obtaining a C3 Use Class-equivalent housing value. As required by the Planning Practice Guidance, LPAs *'need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market'* (see [Housing Supply and Delivery](#): Paragraph: 035 Reference ID: 68-035-20190722) calculated through a formula determined by the number of adults currently in households and the number of students currently in student only households.
- 5.9 Therefore, while such communal accommodation, usually counted in terms of bed spaces, counts towards the housing supply, it is not counted on an equal basis in comparison to C3 housing units, as the contribution that C2 units make to the supply of housing is based upon the amount of housing that is released upon their occupation. For example, it is assumed that an elderly household (including the average number of adults for that local authority) relocates from a single C3 dwelling to separate C2 bed spaces, therefore requiring more C2 units than C3; hence, the discount is applied.
- 5.10 Consequently, as at 01 April 2020, there were 4 extant planning permissions involving C2 units, 1 of which includes the demolition of 41 C2 units. Without the C2 discount applied, these 4 permissions equate to a total net number of 127 units. With the C2 discount applied, these 4 applications equate to a total net number of 78 units (i.e. the C3 equivalent value). This is the net number of units to be counted as part of the housing supply for extant planning permissions including C2 units.

Site Allocations Local Plan (SALP), 2016 allocations

- 5.11 While not separately identified, it should be noted that a proportion of the site allocations in the trajectory are sites that are being carried forward from the SALP (2016). These are sites that have either not yet been granted planning permission but that have been re-assessed as being suitable and available for housing or have been granted planning permission but have not yet been substantially implemented.

Those allocated sites in the trajectory with extant planning permission do not have housing figures phased in their rows as they are already counted separately under the extant planning permissions row.

- 5.12 The [2019/20 Five-Year Housing Land Supply Statement](#) identified 6 residential site allocations in the SALP which, as at 01 April 2020, had not yet gained planning permission which together had an identified capacity to deliver 276 units in total. However, as part of the assessment work informing the PSLP, the capacities on some of these sites have been reviewed and amended (or the site removed) where a higher or lower capacity is considered to be more suitable. There has also been further review of the capacity of some sites allocated in the SALP already with extant planning permission where the permission only relates to a part of the site.
- 5.13 The phasing of these sites either relies on direct advice from site promoters, housebuilders and/or developers or, if it has not been possible to obtain this, have been phased in accordance with the Housing Delivery Phasing and Build-Out Rate Methodology. Site allocations from the SALP (2016) that are no longer deemed to be either suitable or available for housing will not be reallocated and have therefore not been counted within the trajectory.

Pre-Submission Local Plan (PSLP) site allocations

Introduction

- 5.14 In the PSLP, it is proposed to allocate a total of 71 sites, 58 of which have identified residential capacities and 13 of which are proposed for non-residential/mixed-use development with no residential element. In total, the sites proposed for allocation in the PSLP will deliver approximately 9,194 dwellings including on sites with extant planning permission, or 8,274 dwellings when excluding extant planning permissions. The phasing of these sites within the trajectory has generally been as per the methodology detailed in the Housing Delivery Phasing and Build-Out Rate Methodology; however, site promoter information may be used to inform expected phasing and build-out rates for proposed allocations. It should also be noted that there are a number of assumptions within the trajectory for proposed site allocations that have required consideration beyond the Council's Housing Delivery Phasing and Build-Out Rate Methodology, or elements which require greater clarification. These have therefore in-turn been outlined in the following sub-sections.

Staggered development within settlements

- 5.15 Where there are several allocations within or around a particular settlement, developers may wish to stagger their start on site and construction of units relative to other sites due to local housing market conditions. Proposed site allocations within the same settlement have therefore, where possible, and taking into consideration their respective scale and location, been phased at separate times in the trajectory to ensure that not all site allocations within any settlement are delivered at the same time. However, for the purpose of ensuring that there is a

sufficient and consistent supply of housing across the Local Plan, it may not always be possible to stagger sites around a settlement. This is because there may be instances where there is no other alternative than for more than one site to deliver in a settlement at any one time taking into account the number of sites and their respective sizes as well as site promoter expectations for submitting planning applications and/or relevant recent planning activity (as discussed further on).

- 5.16 Furthermore, for some site allocations, consideration has been given to whether their delivery is dependent on the delivery of another/adjoining site allocation with the phasing in the trajectory reflecting this where this is the case.
- 5.17 There are, however, exceptions to staggering development on different sites within the same settlement where more than one site allocation in a single settlement may come forward at any one time, such as when two relatively smaller allocations may come forward at the same time. In addition, there may be instances where the final balance of a larger site, which is phased to deliver at the latter stages of site development, coincides with the initial delivery of a small site within the same settlement.

Allocation capacities and ranges

- 5.18 Where a range has been applied to the yield of proposed site allocations in the PSLP (i.e. lower and upper ranges), for the means of calculating an expected delivery in the trajectory, the mid-point of the range has been used; for example, a site expected to deliver between 40 and 60 units in the Local Plan has a figure of 50 applied within the trajectory. As above, the majority of proposed site allocations in the PSLP are allocated for residential development, however a number of sites are allocated for non-residential development. These sites are not given an allocation capacity and therefore have a figure of 0 applied within the range columns, as well as within the trajectory.

Site Allocations with extant planning permission

- 5.19 Where a site allocation is proposed for residential development and has been given a capacity, although already has extant planning permission, a figure of 0 is applied on the allocation row within the trajectory as the number of units to be delivered will already have been counted under the extant planning permission row (to avoid duplication). The exception to this is where the allocation is to provide additional units on a larger overall site that incorporates the extant planning consent. For example, AL/PW 1 (Land at Mascalls Farm) is allocated for 412 units, although already has extant planning permission for 309 units; therefore, the site is phased to deliver an additional 103 units (to reflect a recent application permitted after 31 March 2020 (19/02533/FULL) to increase the consented number of units by 4 to 313, with the balance of 99 expected to be delivered in addition). Indeed, there are a number of sites consented after 31 March 2020 that are not included under the extant planning permissions and are therefore phased as part of the allocation in the trajectory.

- 5.20 Alternatively, a site may be allocated for less units than a planning permission, which will be reflected as a minus number in the trajectory, to take into account the possibility that a revised scheme for fewer units may come forward. For example, AL/RTW 1 (Former Cinema Site, Mount Pleasant Road) has extant planning permission for 108 units, although is allocated for 100 units; therefore, -8 is phased in the trajectory alongside the allocation. The same rule also applies to AL/RTW 4 (Land at 36-46 St John's Road).

Phasing and build-out rates

- 5.21 As above, the Council has generally used the Housing Phasing Delivery and Build-Out Rate Methodology outlined within this topic paper to phase proposed site allocations (as well as extant planning permissions) within the trajectory, unless either up to date site promoter information has been received which provides a reliable and realistic timeframe for delivery, or there are site-specific circumstances which are likely to have an impact.
- 5.22 The Council also carried out an informal consultation with site promoters (to all those who submitted a site in the Call for Sites) during Spring 2018, requesting their initial expectations for their site's delivery rates and the earliest expected date that a planning application may be submitted. Where site promoters have provided an expected build-out rate, this has been considered alongside the Council's proposed phasing and build-out rates (if the site has been considered suitable for allocation) in the Housing Delivery Phasing and Build-Out Rate Methodology section of this Paper, unless they are not considered to be a realistic expectation. The Council has also taken into consideration relevant representations from site promoters received during the Regulation 18 consultation on the Draft Local Plan. Generally however, proposed site allocations proposed for delivery early in the Plan period are primarily those sites which have current planning activity, such as any pre-application requests/meetings, any live or imminent planning applications that may indicate that a site could be delivered earlier in the Plan period, or an extant planning permission granted after the end of the latest monitoring period.
- 5.23 There are also instances where exceptions to using either the Council's Housing Delivery Phasing and Build-Out Rate Methodology, or site promoter information, applies. For example, while STR/RTW 2 (The Strategy for Royal Tunbridge Wells Town Centre) is allocated for 150-200 (mid-point 175) units and is therefore of a medium site size, it is likely that the allocated figure would be delivered through multiple smaller site developments. Consequently, the allocated has accordingly been phased as per the small site size build-out rates in the Council's methodology. This site has also been phased in accordance with the expected publication date of the Town Centre Plan/Supplementary Planning Document, due by 2025/26 (hence phased beyond this year).

C2 discounting

- 5.24 As explained for the extant planning permissions included within the trajectory, the Council should apply a discount to the number of C2 units to be planned for in order

to obtain a C3-equivalent value in housing terms. Therefore, likewise with extant planning permissions, any proposed allocation to be allocated for C2 development should also be discounted.

- 5.25 In total, there are 4 proposed site allocations allocated for C2 development. These allocations are listed below:
- a) AL/RTW 9 in Royal Tunbridge Wells (Land at Beechwood Sacred Heart School) allocated for 69 C2 units;
 - b) AL/PE 6 in Pembury (Woodsgate Corner) allocated for 80 C3 – 120 C2 units;
 - c) AL/PE 7 in Pembury (Cornford Court) allocated for 68 units; and,
 - d) AL/PE 8 in Pembury (Owlsnest Wood, Tonbridge Road) allocated for 76 C2 units (and 1 C3 demolition).
- 5.26 As shown within the trajectory, each of the above allocations has an additional row for their C2 discount, with the discount deducted from the non-discounted number of units in the lower, middle, and upper ranges as well as within the phasing. It should be noted, however, that the allocated number of units for AL/RTW 9 and AL/PE 7 are not phased alongside the allocation as these sites already have extant planning permission and are therefore already counted under planning permissions.
- 5.27 AL/PE 6 is allocated for either C2 or C3 development, therefore a C2 discount has only been applied to the C2 element (i.e. the upper range of 120 C2 units). When the C2 discount is applied to 120 units, this equates to 62 units (i.e. C3 equivalent). Therefore, the revised range (inclusive of the C2 discount) is 62-80 units, with the mid-point of 71 units to be phased. This is also reflected within the phasing, with the non-discounted figure in the first row, with the C2 deduction phased in the second row.
- 5.28 Additionally, AL/PE 8 is allocated for 76 C2 units, although includes 1 C3 demolition; therefore, the non-discounted allocated figure is net 75 units. When the C2 discount is applied, the number of units to be allocated and phased is 38 units. This is likewise reflected within the phasing.

Strategic site allocations

- 5.29 For the larger strategic site allocations proposed in the Local Plan (i.e. Tudeley Village and the Paddock Wood urban expansion (including land in East Capel)), additional consideration has been given to the phasing and expected annual delivery/build-out rates beyond the Council's Housing Delivery Phasing and Build-Out Rate Methodology:
- For Tudeley Village (STR/SS 3), it is proposed that for the first 10 years of delivery from 2025/26, 150 units are expected per annum, increasing to 200 per annum during the years after. Although lower than the that proposed in the phasing methodology (based on sites of 2,000+ dwellings), further analysis of

the data analysed in the Letwin Review (2018) indicates that, for sites between 2,000 and 4,000 units, 181 units are generally delivered per annum (see [Annex AX26](#) of Letwin Review (2018)). Consequently, as Tudeley is expected to in total deliver up to 2,800 units, it is considered that the expected delivery of 150-200 per annum is appropriate. It should also be noted that, due to the expected start date of 2025/26, delivery of this site is expected to extend beyond the Plan period (i.e. beyond 2038);

- For the Paddock Wood urban expansion (including land in East Capel; STR/SS 1), it is proposed that 300 units are delivered per annum from 2025/26, followed by a final year of 240 units in 2036/37. This figure accurately reflects the build-out rate identified in the phasing methodology (i.e. 299 units per annum; see **Table 8** and [Annex AX26](#) of Letwin Review (2018)). This site has been strategically masterplanned by David Lock Associates, a reputable national consultancy who has considerable experience of undertaking masterplanning work for large scale strategic settlements (please refer to the Strategic Sites Topic Paper for further information). The masterplan for Paddock Wood and east Capel has been informed through discussions with the four main housebuilders around Paddock Wood (Crest Nicholson, Dandara, Redrow and Persimmon) and it is anticipated that all four will build on their site approximately simultaneously in response to market conditions. While 300 units per annum is higher than that identified in the Letwin Review (2018) for sites between 2,000-4,000 units (see above), DLA considers the delivery of 300 units being delivered per year across the parcels towards the medium / long-term (2025/26 onwards) is a reasonable expectation for large strategic sites. This equates to four outlets delivering one market home per week, plus commensurate affordable housing provision.

Windfalls

Small sites (one-nine units)

- 5.30 The Council has put forward a windfall allowance of 1,232 across the Local Plan period for small sites whereby an estimated 98 per year will be delivered for seven years from April 2023 (counted from this year onwards to exclude/to prevent double counting extant planning permissions), and then 78 per year for the remainder of the plan period. Generally, the Local Plan will measure windfall sites as those sites that deliver between 1 and 9 units that are not from allocated sites. These sites will usually be located within the Limits to Built Development. The potential for larger windfall sites will be discussed below. This windfall allowance is based on compelling evidence from past windfall completion rates in the borough, including negative delivery (i.e. where demolitions reduce the overall numbers). The data in the Brownfield and Urban Land Topic Paper shows that small windfall sites have accounted for a significant proportion of total housing completions over time (some 38% between 2006/07 and 2018/20). The average delivery rate has been 119 per annum for 2006 -2020.

- 5.31 The main sources of supply have been sites in existing residential use (e.g. via redevelopment or conversion), other urban land, former offices, agricultural conversions and other ('sui generis') land uses. These uses are likely to continue as future sources of supply. Government reforms to Permitted Development Rights and the Use Classes Order may also contribute.
- 5.32 Over a sustained period, small sites have continued to play a significant part in housing supply. However, as set out in the Brownfield and Urban Land Topic Paper, the longer-term average is 122 dwellings on small sites per year (net). However, it is uncertain whether this will be fully sustained over the whole Plan period, as opportunities within LBDs are finite and many of the more achievable infills, redevelopments and conversions may have been undertaken. There is a need to be cautious and not to over-estimate, as this could compromise five-year housing supply. It is difficult to estimate how the various factors will interact in the future, but a cautious approach to future windfall rates is intended to ensure that there will be no pressure for further allocations beyond those to be identified in the Local Plan.
- 5.33 Taking into account all of the above, there is evidence to justify a small site windfall allocation of 98 per year from April 2023 and then 78 per year for the remainder of the plan period. This is approximately 20% below the long-term average for seven years from April 2023 (to avoid double counting existing permissions), and some further 20% below that for seven years from April 2030. It is considered to be a very reliable figure, in accordance with NPPF paragraphs 68c and 70, that properly provides for small, unidentified sites coming forward through the planning process throughout the Plan period to be taken into account, while not being over-relied on as a means to achieving the borough's housing target.

Large windfall sites (10 units plus)

- 5.34 Consideration has also been given to an allowance for larger unidentified (windfall) sites (10 plus units), providing a total of 336 dwellings across the Local Plan period, based on an estimated 24 dwellings per year being delivered.
- 5.35 As with the smaller sites above, this allowance was reached by assessing evidence from past windfall completion rates on larger sites in the borough, including negative delivery (i.e. where demolitions reduce the overall numbers) which is set out in more detail in the Brownfield and Urban Land Topic Paper. This analysis shows that the overall contribution of larger (measured here as 10 or more units) windfall sites has been around 39% (on average) of the total completions per year, equating to around 135 units pa. However, this includes high proportion of greenfield sites outside LBDs, both in early years before the 2006 Local Plan and, more recently, as a consequence of not having a five-year Housing Land Supply.
- 5.36 As well as greenfield sites, which form the main source of supply, offices and, to a lesser extent, sites in mixed use and existing sites in residential use have also contributed. Supply for 2006-2011 shows a significant fall in completions from the previous period when market conditions were notably stronger. Figures since 2011

are considered to reflect the more steady (generally weaker) prevailing economic conditions.

- 5.37 Offices, as well as other commercial uses, are likely to be a continued supply of large windfalls sites. Government reforms to Permitted Development Rights and the Use Classes Order are also likely to boost supply. Greenfield sites outside LBDs will reduce significantly once there is a five-year Housing Land Supply and a suite of adopted Local Plan site allocations, but there may potentially be other brownfield sites outside LBDs (subject to policy for development in the countryside) that come forward.
- 5.38 Therefore, in the context of preparing a new Local Plan, it is considered appropriate to base a larger sites windfall allowance on the following:
- Do not project forward historic completions on greenfield sites
 - Also, do not project forward additions to housing supply from changes of use from C2 (residential institutions) to C3 (housing), given the ageing population profile
 - Primarily consider sources and scales of housing supply since 2011, both to reflect prevailing market conditions and subsequent to adoption of the Core Strategy
 - Use a discounted delivery rate of 80% of the average number of completions on brownfield and other urban land within the established Limits to Built Development since 2011 (excluding the greenfield and C2 sites), as a reasonable, if conservative, estimate of future delivery, taking into account recent trends and national policy initiatives, as well as local policies
 - Apply the projection from April 2023, to avoid double counting permissions
- 5.39 This approach yields an allowance of 24 units per year, or 336 dwellings over the plan period. Further details are in the 'Brownfield and Urban Land Topic Paper'.
- 5.40 In the light of current consultation on further extensions to Permitted Development Rights, it will be important to closely monitor actual delivery against this estimate over the coming years.

6.0 The Supply of Housing for Particular Groups

6.1 This section sets out how the Local Plan can most appropriately meet, or contribute to meeting, the needs of particular groups and certain types of housing supply, as identified in the accompanying 'Housing Needs Assessment Topic Paper'.

Affordable housing provision

6.2 Tunbridge Wells borough is recognised as a 'high affordability pressure area', with a consequently significant need for affordable housing. At the same time, the Planning Practice Guidance notes that '*when producing policies to address the needs of specific groups strategic policy-making authorities will need to consider how the needs of individual groups can be addressed within the overall need established*' ([see Planning Practice Guidance: Housing and Economic Needs Assessment: Guides Councils in how to Assess their Housing Needs: Paragraph: 017 Reference ID: 2a-017-20190220 \(2019\)](#)).

6.3 Therefore, consideration should be given to optimising the supply of affordable homes.

6.4 in order to provide for the affordable housing need in the borough as effectively as possible throughout the Plan period. This has regard to:

- the size of developments which are expected to provide affordable housing
- the proportion of affordable homes that are sought
- the tenure mix sought
- viability

Site size thresholds

6.5 Paragraph 63 of the NPPF sets out national policy on when affordable housing may be sought. It states: '*Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).*'

6.6 In this context, 'major developments' are those of 10 or more dwellings. Also, an Area of Outstanding Natural Beauty (AONB) is a designated rural area; hence, there is scope for affordable housing to also be sought in the High Weald AONB from schemes of more than 5 dwellings; i. e. this lowers the potential threshold to 6 dwellings. It is noted that a case has to be made for these thresholds.

6.7 Various studies, most recently the Review of affordable housing needs in the context of 'First Homes', demonstrate a substantial need for affordable housing

across the borough. This provides a clear case for adopting the lowest thresholds consistent with the NPPF, namely, from 10 or more dwellings generally, with further provision for contributions from smaller schemes of 6-9 dwellings in the AONB.

- 6.8 Indeed, the Council has considered seeking affordable housing requirements that go beyond the NPPF, with no minimum threshold and expecting a financial affordable housing contribution on all sites delivering a net increase of 1-9 dwellings across the borough. However, it accepts that this would not accord with national policy, consistency with which is a test of soundness of local plans. Rather, further measures are proposed to maximise suitable provision, as set out below.

Proportion of affordable housing sought

- 6.9 At present, in accordance with current affordable housing requirements in Core Policy 6 of the Tunbridge Wells Borough Core Strategy (2010) ([view the Core Strategy](#)), 35% of housing on all sites of 10 or more dwellings should be affordable. This is not untypical. However, and having regard to the viability advice that greenfield sites should be able to contribute a somewhat higher proportion of affordable homes (although brownfield sites likely less), it is found that an alternative approach, which requires sites comprising mostly greenfield (undeveloped) land to deliver a minimum of 40% affordable housing, whereas sites comprising over half brownfield (previously developed) land will be required to deliver a minimum of 30% affordable housing (to encourage deliverability) would increase overall affordable housing supply.
- 6.10 As a simple comparison, taking the total local housing need (678 dwellings pa) minus an average 88 dwellings pa small sites windfall allowance (as a proxy for ineligible sites), gives a total supply of some 590 dwellings on larger sites. Based on an estimation that approximately 80% of all new housing will be on greenfield sites with 20% on brownfield (which reflects the share in recent years), the yields from the respective thresholds are shown in **Table 10** below. It can be seen that the differentiated approach provides 18 (8.7%) more affordable units per annum than the 35% wide figure (the current policy), which would result in an additional 270 affordable housing units over the Plan period, assuming that it “bites” for completions from 2023 (i.e. over 15 years).

Table 10: Indicative affordable housing provision per annum

W h	Via Core Strategy	Greenfield/Brownfield Differentiation
Total dwellings on large sites	590	590
Brownfield	35%	20% = 118* x 30% = 35
Greenfield	35%	80% = 472 x 40% = 189
Total affordable dwellings	206	224

ese percentage requirements are found to be viable for sites of 10 or more dwellings, the contribution from smaller sites will inevitably be somewhat less. Also, it would be prudent to provide for some graduation in any event. Therefore, it is

proposed that sites within the High Weald Area of Outstanding Natural Beauty delivering 6 to 9 dwellings will be expected to provide a financial contribution towards the provision of off-site affordable housing (land and build costs) based on 20% of the gross number of residential units to be provided on sites comprising mostly greenfield land, and 15% of the gross number of residential units to be provided on sites comprising over half brownfield land.

Tenure mix and viability

- 6.12 The 'Housing Needs Assessment Topic Paper' identifies that the need for affordable housing is such that it would be appropriate for 60% of affordable housing to be social rent and the balance to be intermediate tenures. This can be reflected in the policy, as it has been found to be viable – see 'Viability Assessment'. This will be applicable to all sites that are to deliver affordable housing on site.

Design and building standards for affordable housing

- 6.13 Affordable housing should be built to the same standard as open market housing and comply with other policies for design and sustainable development in local plans. This will be a requirement of the affordable housing policy and ensure that affordable housing is visually indistinguishable from the open market housing. To further facilitate this affordable housing should have equal access to facilities such as open spaces and community facilities. Affordable housing may be clustered to assist with management and service charge arrangements, but these clusters should be well distributed throughout the wider development.
- 6.14 As discussed in the following sub-sections, it is also proposed that all affordable housing units should also be required to meet Building Regulation Standard Part M4(2) (discussed in the House for Older People sub-section), with a suitable requirement for new housing to meet Building Regulation Standard Part M4(3) to ensure wheelchair access/adaptability (discussed in the Housing for People with Disabilities sub-section). The M4(3) standard is only targeted at affordable dwellings, as there is a more identifiable need for wheelchair accessible and adaptable housing in the affordable housing sector.

Local connection cascade

- 6.15 The Housing Needs Study (2018) establishes that there is a substantial need for affordable housing across the Borough, and that most households on the register are seeking properties in their locality. High house prices put additional pressure on those households who cannot achieve homeownership through the open market and are looking for affordable routes to homeownership.
- 6.16 In order to support the provision of affordable homes for local people a 'local connection cascade' will be used for all types of affordable housing. It will operate on a case-by-case basis and be reflective of the Council's housing allocations policy. The aim will be to prioritise households with an established local connection

to a parish or town through residence, place of work, and then considering households from the surrounding parishes in the borough and then the wider area.

Housing for older people

- 6.17 For the purposes of the Local Plan, and in line with the NPPF, 'older people' are defined as people over or approaching retirement age which includes the newly retired and active elderly through to the very frail.
- 6.18 Housing for older people includes a variety of accommodation to suit their changing needs and should help them to live independently for longer. It includes accessible/adaptable general market housing, retirement living or sheltered accommodation, extra care accommodation which can include 24-hour access to emergency support, and residential care homes/nursing homes.
- 6.19 As outlined in the Housing Needs Assessment Topic Paper, the population of all age groups (65-75, 75-85, and 85+) are expected to increase, with those in the 85+ age group set to almost double (684%). As a proportion of the overall population, those over 65 years old are expected to increase from 19.6% to 40% over the plan period. The Local Plan will therefore need to recognise and plan for this increasing proportion of older person households. Indeed, the Topic Paper notes that the Housing Needs Study clearly demonstrates the strong desire of many older people to continue to live in their current homes, nonetheless meaning that a proportion will likely need some assistance and/or adaptations. Hence, as noted above and further explained below and in the Housing for People with Disabilities sub-section, there is a strong argument for requiring new housing to be accessible and adaptable.
- 6.20 It is proposed that housing suitable for meeting the varying needs of older people should be integrated within all schemes of 20 or more homes, particularly those that are close to local services, notably shops for day-to-day purchases, healthcare and social/community facilities, and/or regular bus routes. As specified, this may be achieved through meeting the M4(2) standard (which will allow a greater number of people to stay in their homes due to the increased ease of adaptability), bungalows and sheltered or other age-specific schemes. The Housing Needs Study (2018) suggests that 5% of the total supply of accessible and adaptable (M4(2)) dwellings should be built to wheelchair accessible/adaptable standard (M4(3)). Local Plan policies for wheelchair accessible homes should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling ([See PPG Paragraph 009](#)). Therefore, where there is an identified need in the ward or parish, it is proposed that 5% of the affordable housing element on a scheme of 20 or more should meet the M4(3) standard. By making provision for accessible and adaptable homes to meet the needs of older people and people with disabilities, allowing them the option to stay in their own home for longer, there may be a resulting decrease in the need for sheltered and age specific accommodation.
- 6.21 In order to provide for more specialist housing for older people, it is proposed to provide opportunities for a range of suitable accommodation, including sheltered

accommodation, extra care and nursing/care homes. This will include making provision in strategic site allocations; also, schemes for new sheltered, extra care, and residential/nursing care homes will be supported on suitable sites allocated for residential development, as well as other locations, including by the extension of existing sites, particularly where these are accessible to a range of facilities.

- 6.22 The Council consequently considers that the needs for older persons' housing will be sufficiently taken into account in the Local Plan throughout the plan period. A proposed policy (Policy H 6 in the Pre-Submission Local Plan) will set out how it will encourage the delivery of housing for older people via relevant planning applications, through larger site allocations, as well as by allocating sites for C2 dwellings where appropriate (including mixed use schemes).

Housing for people with disabilities

- 6.23 The HNS, as noted in the Housing Needs Assessment Topic Paper, found that 5.3% of all properties across the borough have been adapted or purpose-built for a person with a long-term illness, health problem or disability, with national data suggesting that around 3.3% of households contain at least one wheelchair user. Consequently, it is proposed that the new Local Plan delivers at least 5% of all affordable housing units on sites of 20 or more units that will be required to achieve Building Regulation Standard Part M4(3) (or any subsequent updates) in order to sufficiently meet the needs of people with disabilities.

Self-build and custom housebuilding

- 6.24 As outlined within the Housing Needs Assessment Topic Paper, the Council implemented a local connection test to the Council's Self-Build and Custom Housebuilding Register which resulted in the splitting of the Register into two parts. Part 1 lists all those people on the Register who meet the local connection test criteria, and Part 2 lists all those people on the Register who do not meet the local connection test criteria. The Council also contacted all those on the Register following the implementation of the local connection test to update their details accordingly, and in accordance with the Regulations removed all those who did not respond or who requested to be removed from the Register. Having implemented the local connection test and updated the Register, there are currently 108 registrations on Part 1 (i.e. meet the local connection test criteria) of the Self-Build and Custom Housebuilding Register since the introduction of the Register on 01 April 2016, accumulated over the five existing base periods to 30 October 2020.
- 6.25 As of 30 October 2019, there were 226 individuals and 2 groups registered on the Register. However, following the update and review of the Register, as shown in Tables 9-13 of the Housing Needs Assessment Topic Paper, this number reduced to 87 individuals (74 on Part 1 and 13 on Part 2) and 0 groups. In the most recent

base period, a further 47 registrations were added to the Register (34 on Part 1 and 13 on Part 2), totalling 134 registrations (108 on Part 1 and 26 on Part 2).

- 6.26 While it is acknowledged that Councils have a duty to grant planning permission within three years from the end of each base period for an equivalent number of self-build and custom housebuilding plots as there are entries for that base period, it is noted that the Council does not currently have any monitoring mechanism in place to monitor self-build and custom housebuilding schemes (unlike in CIL-charging local authorities with the ability to monitor permissions through the CIL self-build charging exemption). Therefore, it is not certain whether the Council has not met any need prior to the review of the Register.
- 6.27 However, the Council carried out a survey between 27 May – 22 June 2020 whereby all agents and applicants of single dwelling completions between 01 April 2016 – 31 March 2019 were contacted as a means of determining the proportion of these considered to be self-build and custom housebuilding schemes. The results of this survey indicated that approximately 50% of single dwelling completions are self-build and custom housebuilding schemes. This corresponds with broad findings obtained from nearby local authorities that have CIL in place, which indicated that the proportion of individual dwelling schemes classed as self-build and custom housebuilding could be between 30-70%.
- 6.28 Applied to completions between 01 April 2016 – 31 March 2020, this equates to approximately 120-125 self-build and custom housebuilding completions. However, the number of registrations remaining on the Register from previous base periods following the implementation of the local connection test represents those who have not yet had their need met.
- 6.29 The Local Plan will therefore aim to meet this existing need of 108 (on Part 1 of the Register), as well as projected forward to the end of the Plan period (31 March 2038) based on the average number of registrations per month. The Housing Needs Assessment Topic Paper outlines in further detail how the level of need for self-build and custom housebuilding dwellings is calculated based on the average number of registrations (on Part 1) per month from the first five base periods. This equates to a projected number of approximately 410 additional registrations, plus the existing 108 on the Register as of October 2020, meaning that the Local Plan will aim to meet a need for 518 self-build and custom housebuilding dwellings by March 2038.
- 6.30 It is considered that most of this need will be met by small, mostly single, dwelling schemes, which based on the Council's windfall allowance (see earlier section on Windfalls), could deliver approximately 401 dwellings (77% of need) over the Plan period. This is based on the above approximation that 50% of units delivered on small windfall sites are on single dwelling schemes and approximately 50% of units delivered on single dwelling schemes are self-build and custom housebuilding. A further estimation of the indicative self-build and custom housebuilding contribution from permissions based on the small-sites windfall allowance for 2020/21 – 2022/23 is also provided. These calculations are shown in **Table 11** below.

Table 11: Expected delivery of self-build and custom housebuilding dwellings from single dwelling windfall schemes (2020-2038)

	Calculation of expected delivery of self-build and custom housebuilding	Number of dwellings
1	Pre-Submission Local Plan small-sites windfall allowance (2023/24 – 2029/30) total (98x7 years)	686
2	Pre-Submission Local Plan small-sites windfall allowance (2030/31– 2036/37) total (78x8 years)	624
3	Percentage of small-sites windfalls delivered through single dwelling schemes	50%
4	Percentage of single dwelling schemes that are self-build and custom housebuilding	50%
5	Percentage of small-sites windfalls that are self-build and custom housebuilding (50% (row 4) of 50% (row 3))	25%
6	Indicative self-build and custom housebuilding contribution from small-sites windfalls (2023-2038) (25% of row 1 + row 2)	327.5
7	Indicative number of windfalls delivered through permissions based on small-sites windfall allowance (2020/21 – 2022-23) (98x3)	294
8	Indicative self-build and custom housebuilding contribution from permissions based on small-sites windfalls allowance (2020/21 – 2022-23) (25% of row 7)	73.5
9	<u>Total self-build and custom housebuilding contribution from small-sites windfalls (2020-2038) (row 6 + row 8)</u>	<u>401</u>

- 6.31 While it is evident that small windfall schemes may make a large contribution toward meeting the self-build and custom housebuilding need (401/518), it is necessary to identify further capacity for some 115-120 dwellings. It is considered most appropriate that provision be sought on larger site allocations in Royal Tunbridge Wells, as this is where analysis shows there is most demand for self-build and custom housebuilding dwellings compared to other parishes in the borough (being 37% of the total for the borough).
- 6.32 In addition, it is considered that Tudeley Garden Village would be an appropriate development for approximately 5% of dwellings to be for self-build and custom housebuilding development. This is because it will be a unique location, where self-build and custom housebuilding homes can flourish without the constraints of existing adjacent development, whilst still under a comprehensive

development/design framework. It will also help diversify the village’s character and may support delivery.

- 6.33 Together, these three allocations would yield approximately 116 self-build and custom housebuilding plots, which together with the anticipated supply from single dwelling sites, as shown in **Table 12** below, would effectively meet the anticipated need of some 518 dwellings over the Plan period. This requirement for self-build and custom housebuilding will be included within the policies for these sites.

Table 12: Meeting the Self-Build and Custom Housebuilding Need (2020-2038)

	Calculation of supply of Self-Build and Custom Housebuilding	Number of dwellings
1	Indicative self-build and custom housebuilding contribution from permissions (2020/21 – 2022/23) + small-sites windfall allowance (2023/24 – 2037/38)	401
2	STR/SS 3: The Strategy Tudeley Garden Village (5% of 2,100 within Plan period)	105
3	AL/RTW 5: Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road (5% of 100)	5
4	AL/RTW 16: Land to the west of Eridge Road at Spratsbrook Farm (5% of 120)	6
5	Total (row 1-4)	517

- 6.34 This balance, which anticipates most self-build and custom housebuilding homes to be on individual plots, with a large additional supply as part of a planned new settlement, together with specific opportunities in Royal Tunbridge Wells, is regarded as an appropriate response to need and opportunities. It effectively meets the anticipated need over the Plan period and may be supplemented in practice by further windfall plots on sites of more than one dwelling.

Gypsies, Travellers and Travelling Showpeople

- 6.35 The Housing Needs Assessment Topic Paper highlights that meeting the specific housing needs of the travelling community should be reflected in Local Plan policies in accordance with the Government's 'Planning Policy for Traveller Sites' (PPTS).
- 6.36 The PPTS, at paragraph 10, sets similar expectations for the identification of sites to meet needs over the plan period, as the NPPF does for "bricks-and-mortar" housing. It states, at paragraph 11, that '*Criteria should be set to guide land supply allocations where there is an identified need.*'
- 6.37 A Gypsy and Traveller Accommodation Assessment (GTAA), completed in 2018, identified a need for additional pitches ([view the GTAA](#)). As stated in the Housing Needs Assessment Topic Paper, it is considered that the Local Plan should make provision for 33 pitches over the period from April 2017 to March 2038, this being the higher GTAA figure, which includes households that have not permanently ceased to travel or have ceased to travel for health or family reasons.
- 6.38 While the GTAA covered the period 2017-2037, it is noted that the Regulation 19 PSLP covers the period 2020-2038. For the purposes of addressing the GTAA need in the Local Plan, the Plan will address the need from 2017-2020 as well as to 2038. With regard to the extra year (i.e. 2037-2038), it is noted that the GTAA identified a need for additional pitches at the rate of 6 pitches for each of the two final 5-year assessment periods (i.e. 2027-2032 and 2032-2037). Based on this estimated additional need (that remains at the same rate for the second half of the period covered by the GTAA), one additional pitch has been calculated to meet the need for the one-year period 2037-2038. This therefore means that the overall need that the Local Plan will address is **33 pitches** (i.e. one pitch higher than the GTAA identified need of 32 pitches).
- 6.39 The GTAA identified this need for additional pitches, being essentially generated by local families already resident in the borough forming new households, being children and/or relatives of current occupants of a site.
- 6.40 The GTAA also concluded that this need could be met through the provision of additional pitches at existing Gypsy and Traveller sites (by intensification and/or expansion) where there was a need due to changes in family circumstances, but did not specify which sites. The GTAA did not identify any need to identify pitches for Travelling Showpeople.
- 6.41 In developing policies to meet this need in the most appropriate way, consideration is respectively given to:
- **Site criteria** – that provide a basis for the determination of planning applications for suitable sites, as well as the assessment of the capacity of existing sites and on considering potential site allocations;

- **Sources of supply** – including a review of existing patterns of provision and implications for future forms of supply;
- **Proposed policy and sites identified with potential for delivering additional pitches and site allocations**

Site criteria

- 6.42 The PPTS cross refers to the general planning policies of the NPPF. It also highlights, in paragraph 10, the general need to protect local amenity and environment, as well as ensuring that the number of pitches relates to the size and location of both the site and the nearby settled population. This will include regard to ensuring adequate facilities within pitches and distances between caravans under separate legislation. Paragraph 13 of the PPTS highlights the need to give consideration to the environmental quality for both the site and surroundings, notably in terms of noise and air quality, lighting, etc. The impact on local infrastructure and services is a further consideration, while the siting of sites should support access to schools, health and other services and promote integration with the local community.
- 6.43 Paragraphs 16 and 17 of the PPTS clarify that traveller sites are inappropriate development in the Green Belt, and that limited alterations to Green Belt boundaries should only be made in exceptional circumstances.

Sources of supply

- 6.44 The provision of 33 additional pitches (for the period 2017-2038) is seen in the context of the existing provision of 56 pitches within the borough (based on the January 2020 Caravan Count, this being the most recent count, the July 2020 and January 2021 counts having been cancelled by the government due to Covid-19 restrictions)
- 6.45 Based on the January 2020 Caravan Count, 88% of sites comprise three pitches or less. This reflects the small, family orientated nature of gypsy and traveller sites in the borough identified by the GTAA.
- 6.46 It follows that, as the need over the Plan period is essentially expected to come from changing demands of existing local families, then first consideration should be given to the potential for delivering additional pitches at established sites. This approach is supported by the advice of the GTAA as the most appropriate way of meeting the identified need within the borough.
- 6.47 For each Gypsy and Traveller site within the borough (included within the biannual Caravan Count) a detailed site assessment has been carried out to identify whether there is potential for delivering additional pitches through intensification and/or expansion. Each assessment has been informed by the detailed site knowledge of planning officers gained through the determination of planning applications, as well

as from site visits made during the biannual Caravan Counts, when each site is visited to confirm the number of pitches.

- 6.48 For the two new sites proposed, a site assessment has been carried out as part of the SHELAA site assessment.
- 6.49 A Land Registry search was carried out to identify whether any of the immediately adjoining land to a site was in the same ownership as the gypsy and traveller site. Where this was the case, an assessment of the adjoining land as suitable for providing additional pitch capacity through the expansion of a site was also considered.
- 6.50 Based upon the recommendations of the GTAA that identified the need for additional pitches being generated by the changing needs of the current occupants of the gypsy and traveller sites within the borough, for those sites where a potential for expansion/intensification had been identified by the site assessment work, the site occupants were contacted on two occasions by letter in autumn 2020 and in winter early 2021. The letter explained the outcome of the site assessment work and requested whether a site visit could be made by TWBC officers to discuss whether there would likely be a need for additional pitches at the site over the coming years (request for a telephone conversation in letter sent winter early 2021). It had been anticipated that these site visits would be carried out as part of the July 2020 and January 2021 Caravan Counts, but the counts were cancelled by the government due to Covid-19 restrictions.
- 6.51 In response to the letters, a number of further site visits were carried out during October/November 2020. These site visits have informed the list of existing and proposed new Gypsy and Traveller sites that may have potential for accommodating additional pitches, shown below in **Table 13**.

Table 13: Existing and proposed new Gypsy and Traveller sites that may have potential for accommodating additional pitches

Site	Parish	Existing authorised pitches	Outstanding permissions (as of December 2020)	Potential additional pitches
STR/SS 1*	Paddock Wood	0	0	3
Bassetts Farm	Horsmonden	1	0	2
Broomhill Nurseries	Cranbrook & Sissinghurst	3	0	2
Cinderhill Wood	Brenchley and Matfield	6	0	2-3

Dean Wood	Paddock Wood	1	0	2
Funnel Piece	Paddock Wood	1	0	2
Greenfields Farm**	Paddock Wood	0	0	3
Heartenoak (North)	Hawkhurst	4	2	0
1 Hartleylands	Cranbrook & Sissinghurst	2	0	2
3 Hartleylands	Cranbrook & Sissinghurst	1	0	0-1
Lordship Stables	Brenchley and Matfield	1	1***	0
Mile Oak Stables	Paddock Wood	5	4	0
Oak Tree Farm	Cranbrook & Sissinghurst	1	0	1
Touchwood	Paddock Wood	2	1	1
Vines Farm	Paddock Wood	1	0	2
Willow Stables	Paddock Wood	3	0	2-3
Total		32	8	24-27

* Three pitches are proposed as part of the strategic proposal for Paddock Wood (including land at east Capel).

** This is a new site submission received during the Regulation 18 consultation on the Draft Local Plan for gypsy and traveller pitches. While there are five existing caravans, these are not subject to a gypsy occupation condition.

*** This is a retrospective permission for the existing single pitch on site.

- 6.52 Detailed site assessment sheets for all gypsy and traveller sites in the borough that have been considered for potential additional pitches are presented at Annex 1: of this topic paper.
- 6.53 Further site visits, including as part of the January 2021 Caravan Count, have been unable to take place due to Covid-19 restrictions (the January 2021 Caravan Count was cancelled by the government). However, in the meantime, a further letter has

been sent to those sites in January 2021 where no response was received in autumn 2020. Telephone replies to these letters and, when possible, site visits by officers will continue to inform and provide updates to the outcome of **Table 13** (final column, 'potential additional pitches').

- 6.54 Further consideration of this potential largely confirms the conclusions of the GTAA that the identified need can be met through the expansion and/or intensification of existing gypsy and traveller sites.
- 6.55 To summarise, and set out in Tables 13 and 14, since the base date of 01 April 2017 (base date for the GTAA) to the beginning of the Local Plan base date of 01 April 2020, TWBC has consented and completed 1 pitch at Willow Stables, and 1 at Funnel Piece (Row 4 of **Table 14**).

Table 14: Need for Gypsy and Traveller pitches 2017-2038 compared with potential supply

Row	Information	Number of pitches	Notes
1	GTAA Identified Need (2017-2037)	32	This need for additional pitches is being essentially generated by local families already resident in the borough forming new households, being children and/or relatives of current occupants of a site
2	TWBC Plan period extended to 2038: additional requirement 1 pitch	1	To reflect the change of the Local Plan period (2016-2036), the Pre-Submission Local Plan is for the period 2020-2038. The GTAA covers the 20-year period 2017-2037 and identifies a need for additional pitches at the rate of six pitches for each of the two final five-year assessment periods, 2027-2032 and 2032-2037. Based on this estimated additional need, that remains at the same rate for the second half of the period covered by the GTAA, one additional pitch has been calculated to meet the need for the one year period 2037/38.
3	Total number pitches 2017-2038 (Row 1 + Row 2)	33	
4	Pitches completed from 01 April 2017 to March 2020	2	One pitch at Willow Stables (18/00856) One at Funnel Piece (16/504444)
5	Total Outstanding Need (Row 3 – Row 4)	31	The number of additional pitches to be delivered during the Local Plan period to meet the need identified by the

			GTAA
6	Potential for additional capacity at existing sites	18-21	Through expansion, intensification, and/or regularisation of sites: details in Table 13 (not including capacity identified by Row 8 of this table)
7	Planning approvals not completed December 2020	8	See Table 13 for details
8	Site allocation/new site submission	6	Small site (for three pitches) as an integral component of the strategic proposal for Paddock Wood (including land at east Capel) and a new site submission (for three pitches) south east of Paddock Wood at Greenfields Farm
	Outstanding need (Row 5)/Estimated total capacity (Row 6 + 7 + 8)	32-35	

- 6.56 Since 01 April 2020, additional pitch capacity has been approved at Heartenoak (North) (2 pitches), Mile Oak Stables (4 pitches), Touchwood (1 pitch) (based on existing consents for unfinished pitches), and 1 pitch (retrospective) at Lordship Stables (20/01504/FULL). In total this equates to 8 pitches granted planning consent since the base date of the Pre-Submission Local Plan (Row 7 of **Table 14**).
- 6.57 This means that the outstanding need (33 pitches, Row 3 of **Table 14**) minus completions (2 pitches) and minus consents (8 pitches) since 01 April 2017 is 23 pitches.
- 6.58 At January 2021, TWBC is currently proposing to deliver an additional 24 to 27 pitches through expansion/intensification/regularisation (total 'potential additional pitches', **Table 13**). This includes three pitches to be delivered as part of the strategy for Paddock Wood, including land at east Capel (PSLP Policy STR/SS 1), and three pitches to be delivered at a new gypsy and traveller site, although immediately adjacent to an existing residential caravan site, at Greenfields Farm, Paddock Wood. These sites are discussed further below.
- 6.59 The total anticipated delivery for the period 2017 to 2038, 34 – 37 pitches, meets the GTAA need of 33 pitches by the end of the Plan period (2038).

Proposed policy and sites identified with potential for delivering additional pitches and site allocations

- 6.60 From the above, it follows that the focus of the Local Plan approach to delivering additional traveller pitches should be through providing scope for existing sites to accommodate additional pitches to meet the needs of the current occupants.
- 6.61 It is considered that, given the relatively small number of additional pitches to be provided for, mostly through the provision of an additional pitch or two dispersed across a pool of existing sites, and mainly through reconfiguration of sites, then this is most appropriately facilitated by a criteria-based planning policy that gives a clear direction to existing (authorised) sites being the focus of further provision.
- 6.62 A site at Greenfields Farm was promoted through the Call for Sites. This site is not located in the Green Belt or AONB and comprises of mostly hard-standing and structures for use by the existing adjacent mobile homes (consented for permanent, non gypsy and traveller, residential use). Capacity for three pitches for gypsy and travellers has been identified that would form an intensification within the site.
- 6.63 The most logical location for the potential need for a further three pitches is as part of the comprehensive approach to the urban expansion of Paddock Wood, including on land in east Capel. This would be outside the Green Belt and outside the AONB. It is proposed that the relevant Local Plan, Policy STR/SS1 The Strategy for Paddock Wood, including land at east Capel includes such a requirement.

Small and medium sized sites

6.64 As previously mentioned, the NPPF (paragraph 68) makes clear that small and medium sized sites, defined as those sites no larger than one hectare in size, make an important contribution to delivering an authority's required housing targets. Moreover, it is required that the Council provide 10% of the total housing supply required over the Plan period on these small and medium sized sites. This is to reduce any over-reliance on larger sites that may be more likely to stall or be delayed through the planning application process.

6.65 Consequently, the Council has assessed its proposed allocations, extant planning permissions, as well as small sites windfall allowance, in order to ascertain the expected level of housing to be provided on sites of one hectare or under as a percentage of the overall housing provision. These calculations are shown in **Table 15** below.

Table 15: Allocation of small and medium sized sites in the Local Plan (2020-2038)

	Number of units	% share towards housing target
Overall housing target (Standard Method over Plan period)	12,204 (678 x 18 years)	
10% minimum small and medium sized site requirement of 12,204	1,220 (12,204 / 10)	
Small site windfall allowance over Plan period	1,310	
Number of units on proposed site allocations one hectare or less (19 sites in total), excluding planning permissions (as counted below) as at 01 April 2020	326	
Number of extant units on sites with planning permission as at 01 April 2020 under one hectare (338 sites in total), including those on site allocations	1,531	
Total number of units to be provided on sites of one hectare or less	3,167	26%
Total number of units to be provided on sites of one hectare or less excluding windfalls	1,857	15.2%

6.66 **Table 15** shows that small and medium sized sites to be delivered during the Plan period will make a contribution of 26% towards the Council's overall required housing target, therefore providing significantly over the minimum requirement of 10%. Furthermore, subtracting small sites windfalls from this calculation, the Council will still deliver 15.2% of its overall housing target on small and medium sized sites which indicates that there is not an over-reliance on the Council's small sites windfall allocation to meet this national 10% requirement.

7.0 Conclusion

7.1 This paper has outlined how the Borough Council aims to meet the housing requirement of 12,204 dwellings from 2020-2038 in the new Local Plan. Moreover, the proposed site allocations in the new Local Plan, in addition to extant planning permissions, SALP allocations, and windfall allowances, will provide an additional allowance of 8.6% on top of this requirement (equating to an approximate total delivery of 13,257 dwellings by 2038). This 8.6% buffer is considered helpful to allow for the potential delay/non-delivery of sites (both extant planning permissions and site allocations) and, potentially, for otherwise contributing further to meeting housing needs. **Table 16** represents the distribution of housing delivery as a share of the 13,257 figure.

Table 16: Local Plan Distribution of Housing Delivery

	Need and Supply of Housing	Total dwellings	% of Need/Supply
1	Housing need (Standard Method)	12,204	
2	Extant planning permissions as at 01 April 2020	3,313	25% of supply
3	Windfall allowance	1,670	12.6% of supply
4	Site allocations	8,274	62.4% of supply
5	Total Local Plan expected housing delivery	13,257	108.6% of need

7.2 This paper has also outlined the Housing Delivery Phasing and Build-Out Rate Methodology used to assess the expected phasing and build-out rates of sites throughout the Plan period and has been applied to both extant planning permissions and site allocations proposed in the Local Plan. Each site allocation has been phased in accordance with this methodology as well as informed by, where appropriate, the responses received from site promoters. A detailed section on the Local Plan housing trajectory is also provided which explains the phasing and build-out rate assumptions applied to the Plan's proposed site allocations, as well as other elements such as C2 discounting and staggering development within the same settlement.

7.3 An assessment of how the Local Plan intends to take into account, and maximise the delivery toward, the needs of particular groups as detailed within the Council's Housing Needs Assessment Topic Paper has also been provided within this paper.

7.4 In respect of affordable housing, the Local Plan aims to maximise affordable housing provision by providing above the requirements in the NPPF.

Appendices

Appendix 1: TWBC Completion Rate Average (Mean)

Clean	From permission to completions start (years)	From permission to finish (years)	Completed within (years)
Average	1.31	1.49	1.18
1-4 units	1.26	1.44	1.17
5-100 units	1.62	1.91	1.29
100-500 units	1.16	2.83	2.66
500-2,000 units	N/A	N/A	N/A
2,000+ units	N/A	N/A	N/A

Raw	From permission to completions start (years)	From permission to finish (years)	Completed within (years)
Average	1.46	1.71	1.25
1-4 units	1.43	1.64	1.21
5-100 units	1.78	2.22	1.44
100-500 units	1.28	3.43	3.14
500-2,000 units	N/A	N/A	N/A
2,000+ units	N/A	N/A	N/A

Appendix 2: TWBC Build-Out Rates per year (2006-2020)

Peak Completions			
Year	1 to 4 units	5 to 99 units	100 to 500 units
2006-07	4	58	75
2007-08	4	50	87
2008-09	4	96	No data
2009-10	4	12	No data
2010-11	4	40	119
2011-12	4	33	31
2012-13	4	15	No data
2013-14	4	41	12
2014-15	4	51	55
2015-16	4	33	122
2016-17	4	37	104
2017-18	4	58	92
2018-19	4	42	70
2019-20	4	48	77
Average	4	43.86	76.73

Average Completions (Build-Out Rate)			
Year	1 to 4 units	5 to 99 units	100 to 500 units
2006-07	1.5	13.75	74.5
2007-08	1.38	11.58	70.5
2008-09	1.42	22.87	No data
2009-10	1.47	6.4	No data
2010-11	1.37	15.71	119

	Average Completions (Build-Out Rate)		
2011-12	1.45	13.11	31
2012-13	1.34	6.11	No data
2013-14	1.35	13.5	12
2014-15	1.78	25.71	55
2015-16	1.47	12.31	62
2016-17	1.41	10.68	60
2017-18	1.3	16.72	67
2018-19	1.3	15.3	36.8
2019-20	1.3	15.7	43.6
Average	1.39	14.23	57.4

Annex 1 of Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan: Gypsy and Traveller Site Assessments

See separate document

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