

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

**Matter 9: Housing Land  
Supply**  
**Issue 1: Total Housing Supply**

Document Reference: TWLP/038



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# Matter 9 – Housing Land Supply

## Issue 1 – Total Housing Supply

### Inspector's Question 1: [re. Figure 9 (Housing Trajectory)]

*How has the housing trajectory in Figure 9 of the Plan been established? What factors were considered in arriving at the figures in the trajectory and are they accurate and robust?*

### TWBC response to Question 1

#### Introduction

1. Figure 9 of the Submission Local Plan (SLP) [[CD 3.128](#)] provides an estimated trajectory of housing completions across the plan period (2020-2038). For reference, Figure 9 has been reproduced in **Appendix 1** with the corresponding breakdown of housing supply components (i.e., the trajectory) in **Appendix 2**.
2. The following response is in two distinct parts:
  - Part A directly addresses the question in terms of how the trajectory has been established, which includes explanations of the underpinning methodology, as well as the nature and basis of the components of housing supply within the Housing.
  - Part B recognises that, while Figure 9 presents the position as at 1 April 2020 (being the base date of the Local Plan), development programmes are dynamic and subject to continual adjustment. In order that the Inspector has the most accurate and robust information, a further updated trajectory is presented, drawing heavily on the Council's more recently published 'Five-Year Housing Land Supply Statement' [PS\_020] as well as other subsequent information.
3. Critically, it is stressed that the methodology applied in the creation of both the 1 April 2020 trajectory at Figure 9 of the SLP and the updated trajectory, in terms of the estimation of development programmes used to construct them are the same.

## **Part A: How has the Housing Trajectory been established?**

### The underpinning methodology

4. Section 7 (Delivery and Monitoring) of the SLP provides a brief explanation and summary of the Housing Trajectory in Figure 9. Paragraph 7.8 outlines the approach to producing the trajectory:

*“Furthermore, in order to inform the assessment as to when housing in the borough can realistically be expected to be built, a methodology has been developed, drawing on advice from the housebuilding industry, which covers both housing delivery (i.e. the rate at which dwellings are expected to be constructed on any one site within a year) and phasing (i.e. the process through which the year that a dwelling is expected to be constructed is calculated. Depending on site-specific factors, as well as a consideration of the cumulative development proposed at a settlement as a whole, this can range from between one year to the end of the plan period, or further)”.*

5. As subsequently noted in paragraph 7.9, *“this assessment enables a projection of the likely timescales for the development of sites and an overall ‘housing trajectory’ for the borough”.*
6. The methodology referred to above is found at Section 4: ‘Housing Delivery Phasing and Build-out Rate Methodology’ within the Council’s Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)], which was prepared for the Pre-Submission Local Plan (February 2021).
7. As per paragraph 4.5 of this Topic Paper, the methodology sets out the following:
  - 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 housing land supply assessment
  - A set of assumptions related to build-rates to be used in the housing land supply assessment

8. Phasing assumptions are presented in Tables 3, 4, 5, 6, and 7 of the Topic Paper<sup>1</sup>, with build-out rates in Table 8. These have been informed by national studies on delivery and local evidence on historical lead-in times and build-out rates of sites within the borough, including site-specific factors. A further, more detailed explanation and justification for these assumptions is provided within the commentary of the Topic Paper from paragraphs 4.29-4.48 on (paginated) pages 17-26.

*The nature and basis of the components of housing supply within the Housing Trajectory*

9. The Local Plan's Housing Trajectory is made up of three main components: extant planning permissions, proposed site allocations (including those carried forward from the previous adopted Site Allocations Local Plan, 2016) and windfall allowances.
- a) Extant planning permissions
10. The data on extant planning permissions is obtained annually as part of the annual monitoring work undertaken to update the Council's Five-Year Housing Land Supply Statement. As above, the Submission Local Plan housing trajectory (**Appendices 1 & 2**) includes extant planning permission data as at 1 April 2020. It is noted, for clarity, that those site allocations with extant permission have been counted under extant permissions only and are therefore not double-counted.
11. Full details of how sites with planning permission have been phased is set out in the latest Five-Year Housing Land Supply Statement [[PS 020](#)].
12. In respect of planning permissions (and proposed allocations) for institutional residential uses falling within Class C2 of the use Classes Order, as set out at paragraphs 5.8 - 5.10 (and paragraphs 5.24 - 5.28), a 'C2 discount' is applied in accordance with Planning Practice Guidance (see [Housing Supply and Delivery](#): Paragraph: 035 Reference ID: 68-035-20190722).
- b) Proposed site allocations
13. The Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)] provides a detailed commentary on the factors considered in the phasing and build-out rates for proposed allocations, from paragraph 5.14 to 5.29. This identifies, at paragraph 5.14, that the

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<sup>1</sup> Each table corresponds to a different site size

phasing of some sites may vary from the default estimated position in the Methodology to take account of site promoter information and other site-specific factors. This includes providing for staggering development within settlements, taking into account an informal consultation with site promoters on their expectations (unless considered unrealistic), as well as representations received during formal Local Plan consultations.

14. Paragraph 5.22 clarifies that, generally, proposed site allocations proposed for delivery early in the plan period are primarily those sites which have current planning activity (such as pre-application discussions, any live or imminent planning applications, or an extant planning permission granted after the end of the last monitoring period). (NB As referred to above, site allocations with extant planning permission are not double counted within the trajectory; they are only counted under planning permissions<sup>2</sup>).
15. Paragraph 5.18 of the Topic Paper also clarifies that, where a capacity range is identified for a proposed allocation, the mid-point has been used within the trajectory. For example, STR/RTW 2 has an allocation capacity of 150-200 units, meaning that 175 units have been phased within the trajectory.
16. Finally, paragraph 5.29 of the Topic Paper provides a commentary on the strategic site allocations proposed within the Local Plan (STR/SS 1 at Paddock Wood and STR/SS3 at Tudeley Village), where additional consideration has been given to the phasing and expected annual deliver/build-out rates, with particular regard given to the Letwin Review (2018) as well as (ongoing) discussions with site promoters.
17. For those sites which are site allocations and are expected to be under way beyond the five-year period post-adoption of the Local Plan, these are discussed in more detail in the Matter 9, Issue 2 Hearing Statement, particularly at Appendix 3. It is also noted that all site allocations are discussed in the respective Hearing Statements relating to individual settlements and parishes. This includes the allocation AL/CRS2 (Land south of Corn Hall, Crane Valley, Cranbrook) which is discussed in Matter 7, Issue 7. Recent communication has indicated that the right to cross AL/CRS1 Land at Brick Kiln Farm has not been confirmed. The Council is in discussion with the developer (and others)

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<sup>2</sup> Subject to adjustment if a site is allocated for less than a planning permission which is not being progressed.

and remains optimistic that this will be resolved. An update will be provided ahead of the hearing.

c) Windfall allowances

18. The housing trajectory also incorporates a windfall allowance (addressed further within Question 2 of this Statement). The allowance is applied from Year 4 to ensure that there is no double-counting with the expected delivery of extant planning permissions. The full justification for this windfall allowance is provided within paragraphs 5.30 – 5.40 of the Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)] and the throughout the Brownfield and Urban Land Topic Paper [[CD 3.83](#)]. As above, this windfall allowance is further addressed within Question 2.

### Overview and testing

19. The Council believes that it has applied realistic, evidence-based phasing and build-out rate assumptions, which are fully justified.
20. The estimates and assumptions within this methodology have been closely examined in recent appeals. It is noted that the Inspector in the recent [appeal decision](#) (at Highgate and Copthall Avenue, Hawkhurst) agreed with the Council's assumptions on particular sites' phasing and build-out rates (where included within its latest Five-Year Housing Land Supply Statement [[PS 020](#)]) in accordance with the Council's methodology.

### **Part B: Updated Trajectory position**

21. The Submission Local Plan's (SLP's) housing trajectory, based on the position at 1 April 2020, is recognised as a 'snapshot in time'. Although the assumptions made are regarded as accurate and robust, based on the latest information available at the time the trajectory was produced, it is inevitable that there will be variations in any subsequent iterations. In effect, it is a 'live' document to be reviewed and updated annually as part of ongoing monitoring.
22. Of course, there have been further residential completions and planning permissions since April 2020, with these being researched and published as part of the Council's most recent 'Five-Year Housing Land Supply Statement' [[PS 020](#)], giving the position as at 1 April 2021. Although this does not look forward over the whole plan period, the

preparation process has yielded more recent information on site promoters' future years' expectations.

23. In addition, the Council's information on site development programmes has been tested through several recent planning appeals. Inspectors' conclusions on relevant appeals in relation to site deliverability (based on the evidence available to them) have been taken into account in updates to the Council's five-year housing supply position, as explained on its [Monitoring webpage](#).
24. Therefore, an updated Housing Trajectory has been prepared, which the Council believes represents the current position as it is known. In essence, this is based on:
  - a) extant permissions as at 1 April 2021 [as [PS 020](#)]
  - b) completions 1 April 2020 to 31 March 2021 [as [PS 020](#)]
  - c) the 'Housing Delivery Phasing and Build-Out Rate Methodology', updated where appropriate to take account of the most recent on site-specific information, including that in Statements of Common Ground with promoters of the strategic sites, the latest planning activity on sites, and the implications of appeal decisions
25. This Updated Trajectory is presented at **Appendix 3**, with the corresponding breakdown of housing supply components (i.e., the trajectory) in **Appendix 4**.
26. It is appreciated that this is to some extent a 'hybrid' trajectory, in that it does not factor in completions or planning permissions since 1 April 2021 (to 31 March 2022) but does account for subsequent information on the deliverability and developability of sites. Nevertheless, this is considered to be as accurate a picture as can currently be presented.

#### Outcomes of the Updated Trajectory

27. A comparison between the completion figures in the Updated trajectory and those in the SLP, broken down annually, is provided in **Table 1 in Appendix 5**. This is supplemented by **Table 2 in Appendix 5**, which shows the relative contributions from different sources - planning permissions, windfall sites and allocations – essentially due to the inclusion of completions from April 2020 to March 2021.



28. It can be seen that there is some change in the annual phasing, resulting from more up-to-date information on planning activity on sites, the amended phasing of some adopted site allocations following recent appeal decisions, and the updated build-out rates determined at STR/SS1. However, these shifts are in the context of a slightly increased overall delivery over the plan period. The main outcomes are seen as being:
- a) The Updated Trajectory anticipates the total supply of 13,343 dwellings within the plan period (2020-2038), an increase of 86 dwellings above the 13,257 dwellings in the Submission Local Plan trajectory. This also means that the buffer above the Plan's housing target of 12,204 dwellings has increased from 1,053 dwellings to 1,139 dwellings.
  - b) The delivery of 13,343 dwellings over the course of the plan period equates to an average annual supply of approximately 741 dwellings.
  - c) The Updated Trajectory has a somewhat lesser supply within the early years to 2024/25, but a comparatively larger expected supply on average from 2025/26-2031/32 (i.e. up to year 10), before reducing somewhat to a lower level until the end of the plan period.
  - d) The overall increase of 86 dwellings is due mainly to a significant number of new windfall sites permitted in the period 1 April 2020 to 31 March 2021.
29. The impact of the Updated Trajectory on the five-year housing land supply is considered in response to Question 2 below.
30. It is also noted that the Council will prepare a further revised trajectory following the completion of monitoring work for the period 1 April 2021 to 31 March 2022, which is part of its updated Five-Year Housing Land Supply position for 2022.

## **Conclusion**

31. Overall, the Council considers that the approach to establishing the Local Plan's housing trajectory, and the factors considered, are accurate and robust, having given consideration to both the Council's housing delivery phasing and build-out rate methodology as well as site-specific circumstances.

32. While it is accepted, if not inevitable, that individual site programmes can vary over time, as evidenced by the Updated Housing Trajectory which draws on the most recent available information, it confirms that, subject to the adoption of the Local Plan, the Local Plan will deliver the requisite housing supply, well distributed over the plan period.

## Inspector's Question 2: [re. windfall allowance]

***Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?***

### TWBC response to Question 2

#### Introduction

33. The Local Plan's 2020 housing trajectory (see **Appendices 1 & 2**) includes a windfall allowance of 1,670 dwellings, which is explained in the related supporting documents and summarised below.
34. It is noted that the updated housing trajectory (see **Appendices 3 & 4**) applies the same approach to windfall sites, albeit the actual numbers are of course impacted by the later (2021) base date.

#### Consideration

35. Paragraphs 5.30-5.40 of the Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)] provide a detailed explanation and justification of the Council's windfall allowance. The windfall allowance is comprised of a small-sites and a large-sites windfall allowance. The allowances draw upon the data and analysis within the Council's Brownfield and Urban Land Topic Paper [[CD 3.83](#)], particularly in Section 4.

#### *Small-Sites Windfall Allowance*

36. Paragraph 5.30 of the Housing Supply and Trajectory Topic Paper explains that the small sites "*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)*". It is added that the Brownfield and Urban Land Topic Paper provides evidence "*that small windfall sites have accounted for a significant proportion of total housing completions over time*" with the average delivery rate for 2006-2019 being 122 dwellings per annum (or 119 for 2006-2020, accounting for 38% of completions). Paragraph 5.31 further outlines that "*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”.*

37. Paragraph 5.32, however, acknowledges that it is uncertain whether the long-term average “*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 therefore “*a need to be cautious and not to over-estimate*”; hence, a 20% discount below the long-term average of 122 has been applied from April 2023, followed by a further 20% below that from April 2030. As per paragraph 5.33 of the Topic Paper, this is considered to be a very reliable figure, in accordance with National Planning Policy Framework (NPPF) paragraphs 69c and 71, “*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-Sites Windfall Allowance*

38. The Housing Supply and Trajectory Topic Paper also provides an explanation for the proposed large-sites windfall allowance within the Plan (24 dwellings per year from April 2023). Similarly with smaller sites, it explains in paragraph 5.35 that “*this allowance was reached by assessing evidence from past windfall completion rates on larger sites in the borough, including negative delivery*”, which is also further set out within the Brownfield and Urban Land Topic Paper, and which has historically contributed to approximately 39% (on average) of completions per annum within the borough (i.e., around 135 units per annum). The Housing Supply and Trajectory Topic Paper acknowledges, however, that this includes a “*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*”. In addition to greenfield sites, the supply of large-site windfalls has also been via offices and, to a lesser extent, sites in mixed used and existing sites in residential use. Moreover, the Topic Paper notes in paragraph 5.36 that the “*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*”.

39. Paragraph 5.37 of the Topic Paper outlines that “*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*”.
40. Given the above, it was therefore considered appropriate to base a large-site 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.
41. The consequent estimate/allowance of 24 units per annum (from April 2023, or April 2024 in the updated 2021 trajectory) is therefore considered to be justified having been based on compelling local evidence and which is in accordance with the NPPF.

### Recent Appeal Decisions

42. The Council also notes that the proposed windfall allowance (which has been incorporated into the Five-Year Housing Land Supply Statements; e.g., see [PS 020](#)) has been considered by Planning Inspectors in two recent appeal decisions. For the Hawkhurst Golf Club appeal, in Paragraph 64 of the [Inspector’s Report](#), the Inspector considered the windfall rates adopted by the Council to be cautious, reasonable and

robust. In addition, for the Highgate Hill/Copthall Avenue appeal, in paragraphs 92 and 93 of the [Inspector's Report](#), addressed a concern raised by the appellant relating to the large-sites windfall allowance, where the appellant considered it not to be necessary given the Council's thorough site identification exercise through its Strategic Housing and Economic Land Availability Assessment (SHELAA) to consider available land. The Inspector, however, accepted the Council's view that the SHELAA is an assessment at a point in time, with a likelihood that further new sites may come forward in the future. The Inspector also drew upon the Council's justification relating to changes to Permitted Development Rights and the Use Classes Order which could also be expected to contribute; although the extent of this is uncertain, the Inspector accepted this point. The Inspector concluded by stating that "*historic evidence has shown that windfalls, including that for large sites, represents a reliable source of supply and given all of the above, I consider the Council's allowance is appropriate. No dwellings should therefore be removed from the Council's supply in this regard*".

## Conclusion

43. Given the above, the Council considers that the proposed windfall allowance (comprised of a small and large sites windfall allowances) within the Plan is justified, based on compelling local historic evidence and which is in accordance with the NPPF.

## Inspector's Question 3: [re. justification for housing supply projections]

**Paragraph 4.54 of the submission version Local Plan states that there is a 'buffer' of approximately 1,000 dwellings (based on the mid-point of dwelling ranges) over and above the minimum housing requirement across the plan period. Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met?**

### TWBC response to Question 3

#### Introduction

44. This question is interpreted as relating to whether a buffer is appropriate, as well as to whether it is sufficient given the level of uncertainty or risk in the projected housing supply.
45. In essence, the Local Plan identifies a projected supply of dwellings over the plan period of some 13,059 to 13,444 (SLP paragraph 4.53), relative to a housing need under the standard method of 12,204 dwellings. This difference, amounting to some 1,000 dwellings (855 to 1,240, with a mid-point of 1,048) is referred to as the 'buffer'.

#### Justification for having a "buffer"

46. The relevant national policy context is provided by NPPF paragraph 68 which states:
- "From this [the SHLAA], planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a) specific, deliverable sites for years one to five of the plan period<sup>34</sup>*
  - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."*
47. Attention is drawn to Footnote 34 which is *"with an appropriate buffer, as set out in paragraph 74 See Glossary for definitions of deliverable and developable."*

48. Hence, the NPPF requires provision of a buffer as part of the five-year housing land supply calculation but does not require it in relation to the supply for the plan period as a whole. Nevertheless, it also gives a clear expectation that plans should “*identify a sufficient supply and mix of sites*”, “*where possible*” for the full 15 years.
49. The Local Plan’s housing buffer is put forward, firstly, to be prudent in terms of providing a degree of flexibility in the actual housing supply, particularly having regard to the high contributions from, and complexity of, the strategic sites (as stated at SLP paragraph 4.54).
50. Another factor that supports the provision of a buffer is the extent of housing need locally, as highlighted in the Council’s Hearing Statement on Matter 2, Issue 1 [TWLP/011]. Furthermore, the Council’s Hearing Statement on Matter 1, Issue 1 [TWLP001] highlights that it has indicated<sup>3</sup> that it “...*may be that, in due course following Examination and adoption of the TWBC Local Plan and subsequent monitoring of housing delivery, there may be scope for any excess buffer to be considered as part of the wider delivery of housing in the Strategic Housing Market Area, and for this to be discussed under the duty to cooperate*”.

### **Size of the buffer**

51. The size of the buffer is considered sufficient to ensure that the identified housing need – which is also the proposed housing requirement – is met. This is because:
- a) In the first instance, there has been considerable dialogue with site promoters over the programming of every individual allocation, as well as sites with extant permission, including those under construction
  - b) A robust approach has been taken to the rate and overall scale of windfall sites, as set out in the Brownfield and Urban Land Topic Paper [CD 3.83]
  - c) In absolute numbers, a buffer of 855 to 1,240 dwellings (with a mid-point of 1,048 dwellings) represents between 1.26 - 1.83 years’ worth of total land supply

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<sup>3</sup> See paragraph 7.03 of the DtC Statement [CD 3.132a]



- d) The strategic sites are relatively refined, being subject to comprehensive masterplanning, led by very experienced consultants with their own team of supporting experts, working together and in liaison with site promoters to ensure deliverable proposals
- e) However, if there are delays, it is notable that the buffer (1,048 dwellings at mid-point) is equivalent to two years' worth of the combined annual build out of both strategic sites (i.e. 300 dpa + 150 dpa = 450 dpa x 2 years = 900 dpa)
- f) If delivery of all extant permissions and the windfall allowances are accepted, then the buffer represents nearly 15% of residual requirement of dwellings required from allocations (8,076 to 8,461)<sup>4</sup>, which is a meaningful proportion

52. The buffer is therefore regarded as justified primarily in terms of providing a sufficient 'safety net' to ensure that the housing requirement is met over the Plan period. It is also an opportunity to meet additional housing needs, as discussed further in response to Question 4 below.

53. It is also worth restating that, in the Council's opinion, the overall scale of growth, as well as the individual site allocations proposed in the Local Plan, has been found to be appropriate having regard to the full range of planning considerations, including environmental designations, in seeking to meet the minimum housing need under the standard method. This view has been reached following detailed site assessments, as set out in its Matter 5 Issue 1 Hearing Statement on Site Selection [TWLP/021] – which also show that a greater buffer, in effect a higher overall supply, would have more negative sustainability implications at both site, settlement and borough levels.

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<sup>4</sup> See SLP Table 4 on page 42 [[CD 3.128](#)]

## **Inspector's Question 4: [re. need for the buffer]**

***In the event that new housing is delivered as expected, what is the justification for the size of the buffer proposed?***

### **TWBC response to Question 4**

54. The merits of the buffer, over and above that which would equal the Local Plan's minimum housing requirement, as set out in SLP Policy STR1, are seen as being:
- It would help ensure that there is, almost certainly, a continuing (five-year) supply of deliverable sites over the plan period, which helps to maintain a plan-led approach to decision-making
  - It would further contribute to meeting housing needs in the local and the wider housing market area, as highlighted in the Council's Hearing Statement on Matter 2, Issue 1. [TWLP/011]
  - It provides scope for housing needs to be met over a somewhat longer period than the 15-year time horizon from adoption of the Local Plan
  - It provides more likelihood of schemes coming forward across the borough, to help meet more local needs and locational preferences
  - The buffer is not so large as to prejudice the development strategy, or the important environmental constraints, while preparation of the Plan has been based on the adequacy of the range of infrastructure being available to support the totality of the growth identified in the SLP
  - As noted above, the allocations are suitable in planning terms and can reasonably be supported
55. As a footnote, of course the Council will not know if the new housing will be delivered as expected until substantially into the plan period. Therefore, as highlighted in the SLP, it is prudent at this point to have some flexibility within the Plan.

## Inspector's Question 5: [re. small and medium sized sites]

***Paragraph 69 of the Framework states that in order to promote the development of a good mix of sites, local planning authorities should (amongst other things) identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why this cannot be achieved. What proportion of the housing requirement will be met from sites no larger than 1 hectare in Tunbridge Wells?***

## TWBC response to Question 5

### Introduction

56. The Council acknowledges that paragraph 69 of the National Planning Policy Framework (NPPF) requires local planning authorities 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*”. Consequently, the Council has made an assessment of the contribution of small and medium sized sites to the Plan’s housing supply in paragraphs 6.64-6.66 of the Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)]. A summary of this assessment is provided within the Council’s response below.

### Consideration

57. Paragraph 6.65 of the Topic Paper explains that “*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 (as at 1 April 2020) are provided in Table 15 of the Topic Paper, which has been reproduced below for ease of reference (see **Table 4**). However, it should be noted that a correction to this table has been made, where the number of units on proposed allocations of one hectare or less (excluding planning permissions) as at 1 April 2020 should have been 290 rather than 326 (as AL/RTW 9 for 36 discounted C2 units was already counted separately under extant planning permissions).

**Table 4 – Corrected Table 15 of Housing Supply and Trajectory Topic Paper (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 (18 sites in total), excluding planning permissions (as counted below) as at 01 April 2020	290	-
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	3,131	25.7%
Total number of units to be provided on sites of one hectare or less excluding windfalls	1,821	14.9%

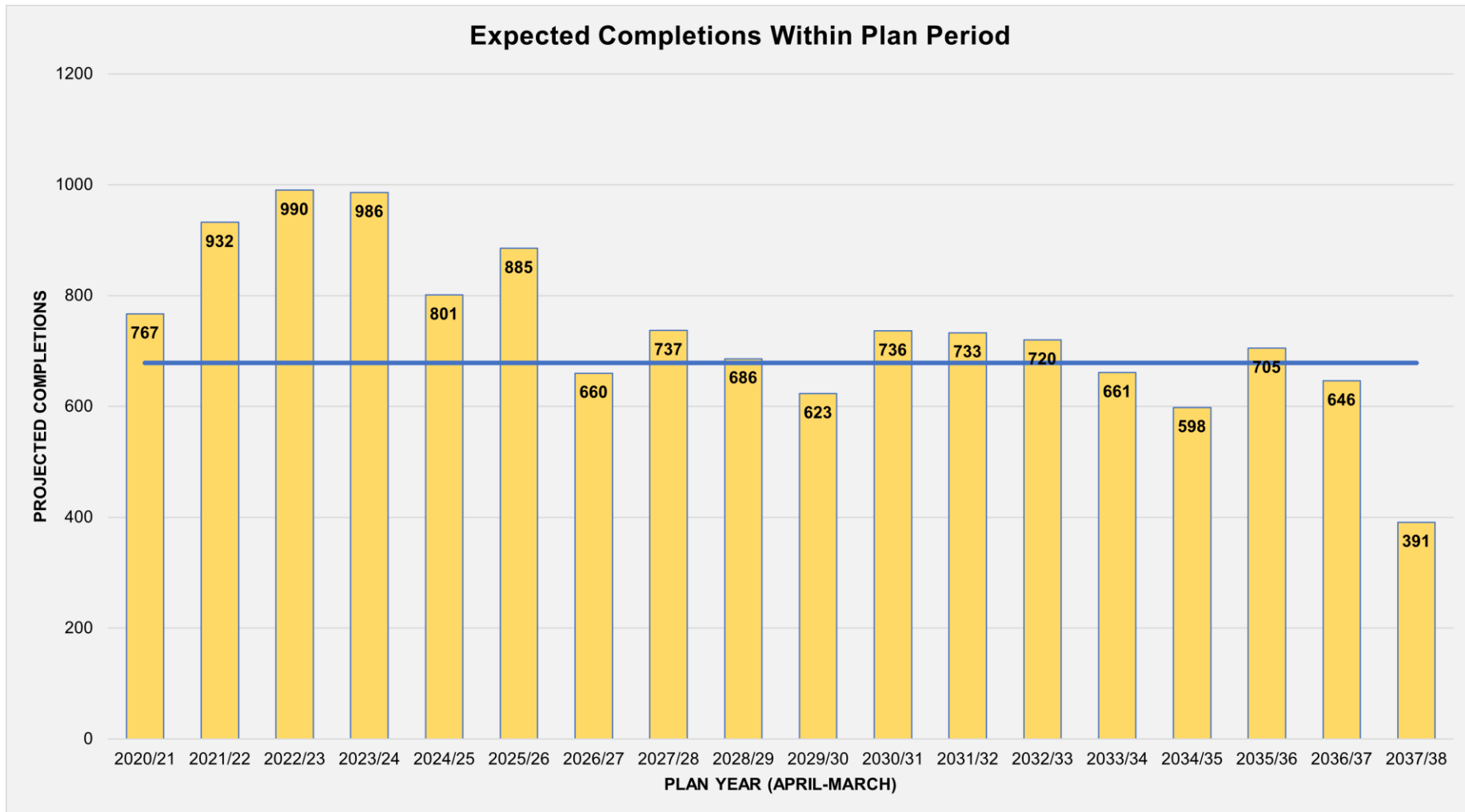
58. **Table 4** shows that small and medium sized sites to be delivered during the plan period will make a contribution of 25.7% towards the Council's overall required housing target, therefore providing significantly over the minimum requirement of 10%. Furthermore, even if small sites windfalls (of less than 10 dwellings) are excluded from this calculation the Council will still deliver 14.9% of its overall housing target on small and medium sized sites. In fact, it is almost certain that sites of one to nine dwellings will be on sites of less than one hectare, so the Council believes that it is appropriate to have regard to them.

## Conclusion

59. The Council is therefore confident that the Plan will provide a sufficient supply of units on sites of one hectare or less (even when excluding windfalls), that ensures that the 10% requirement within the NPPF is met.

# Appendices

# Appendix 1: Figure 9 taken from the Submission Local Plan [[CD 3.128](#)] (Housing Trajectory)



# Appendix 2: Table 9 taken from the Housing Supply and Trajectory Topic Paper [\[CD 3.74\]](#) (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

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 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
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



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

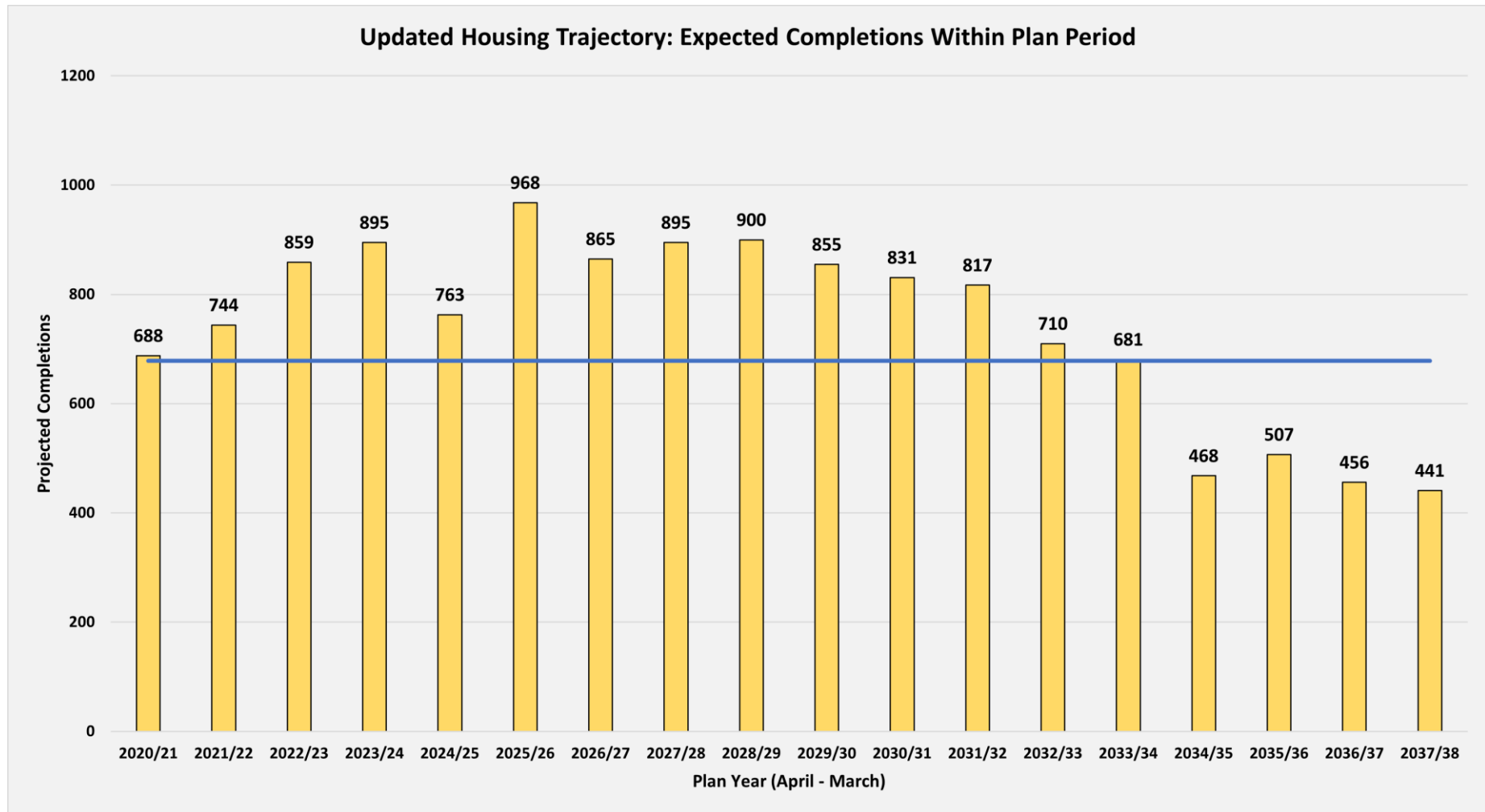
Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals	
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	Cranbrook & Sissinghurst	35	40	45	0	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	40	
AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	Cranbrook & Sissinghurst	200	202	204	0	0	34	70	62	0	0	0	0	0	0	0	0	0	0	0	0	0	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	
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	
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
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	24	
AL/HA 4	Land off Copthall 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	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	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	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	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	24	

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/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	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	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	28
AL/GO 1	Land east of Balcombes 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
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
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	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	0	44	44	2	0	0	0	90
AL/HO 3	Land to the east of Horsmonden	Horsmonden	115	140	165	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	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	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	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	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	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
AL/PE 6	Woodsgate Corner	Pembury	80	100	120	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	-29
AL/PE 7	Comford 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
AL/PE 7 C2 Discount	Comford 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
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	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	-37

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	
<b>Projected Housing Completions</b>						767	932	990	986	801	885	660	737	686	623	736	733	720	661	598	705	646	391	
<b>Cumulative Projected Housing Completions</b>						767	1699	2689	3675	4476	5361	6021	6758	7444	8067	8803	9536	10256	10917	11515	12220	12866	13257	
<b>Housing Target</b>						678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
<b>Cumulative Housing Target</b>						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																			Totals
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	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	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	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	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		
<b>Total from Allocations</b>						0	0	136	495	440	622	538	604	564	501	634	631	618	559	496	603	544	289	<b>8274</b>
<b>Windfall Allowance</b>									122	122	122	122	122	122	122	102	102	102	102	102	102	102	102	<b>1670</b>
<b>Total from Extant Planning Permissions (01 April 2020)</b>						767	932	854	369	239	141	0	11	0	0	0	0	0	0	0	0	0	0	<b>3313</b>

# Appendix 3: Updated Housing Trajectory – Update of Figure 9 of the Submission Local Plan (Housing Trajectory)



# Appendix 4: Updated Local Plan Housing Trajectory – Update of Table 9 of the Housing Supply and Trajectory Topic Paper

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	688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441
Cumulative Projected Housing Completions	688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343
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	0	-8	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	0	70	30	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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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	0	70	30	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	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42
AL/RTW 7	Land at former Gas Works, Sandhurst Road	Royal Tunbridge Wells	170	185	200	0	0	0	0	0	0	0	70	70	45	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	69	0	0	0	0	0	0	0	0	0	69
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	-33	0	0	0	0	0	0	0	0	0	-33
AL/RTW 10	Montacute Gardens	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	0	21
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	Royal Tunbridge Wells	45	45	45	0	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	Royal Tunbridge Wells	50	50	50	0	0	0	0	0	0	0	0	0	50	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	0	70	24	0	0	0	0	0	0	0	0	0	0	0	0	0	94
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	Royal Tunbridge Wells	25	28	30	0	0	0	0	0	0	0	0	28	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	37	0	0	0	0	0	0	0	0	0	0	0	37

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		688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441					
Cumulative Projected Housing Completions		688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343					
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																			Totals
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	60	60	0	120
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
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
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
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	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	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	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
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
AL/SO 3	Land at Baldwins Lane	Southborough	26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
STR/SS 1	The Strategy for Paddock Wood and east Capel	Paddock Wood	3490	3540	3590	0	0	0	10	120	233	310	420	420	390	390	340	290	280	170	102	50	50	3575
STR/SS 2	The Strategy for Paddock Wood Town Centre	Paddock Wood	30	30	30	0	0	0	0	14	0	0	0	5	5	5	1	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	200	200	200	2100
AL/PW 1	Land at Mascalls Farm	Paddock Wood	412	412	412	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	Cranbrook & Sissinghurst	35	40	45	0	0	0	0	0	0	0	0	0	0	0	0	40	0	0	0	0	0	40
AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	Cranbrook & Sissinghurst	200	202	204	0	0	0	0	34	70	62	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
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
AL/CRS 6	Land south of The Street, Sissinghurst	Cranbrook & Sissinghurst	20	20	20	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	0	19
AL/CRS 7	Land at corner of Frittenden Road and Common Road, Sissinghurst	Cranbrook & Sissinghurst	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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		688	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441					
Cumulative Projected Housing Completions		688	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343					
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																			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	
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	
AL/HA 3	Former Site of Springfield Nurseries	Hawkhurst	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 4	Land off Copthall Avenue and Highgate Hill	Hawkhurst	70	75	79	0	0	0	40	31	0	0	0	0	0	0	0	0	0	0	0	0	71	
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	
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	
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	
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	
AL/BE 1	Land adjacent to New Pond Road (known as Uphill), Benenden	Benenden	18	19	20	0	0	0	0	0	0	0	19	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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	0	0	0	0	0	0	24	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	0	0	0	0	0	24	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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BM 2	Land at Maidstone Road	Brenchley and Matfield	11	13	15	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15	
AL/FR 1	Land at Cranbrook Road, Frittenden	Frittenden	25	28	30	0	0	0	23	0	0	0	0	0	0	0	0	0	0	0	0	0	23	
AL/GO 1	Land east of Balcombes 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	
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	
AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	Horsmonden	45	50	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
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	44	44	2	0	0	0	0	90	
AL/HO 3	Land to the east of Horsmonden	Horsmonden	115	140	165	0	0	0	0	0	0	0	0	0	70	50	0	0	0	0	0	0	120	
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	28	

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		
<b>Projected Housing Completions</b>						<b>688</b>	744	859	895	763	968	865	895	900	855	831	817	710	681	468	507	456	441		
<b>Cumulative Projected Housing Completions</b>						<b>688</b>	1432	2291	3186	3949	4917	5782	6677	7577	8432	9263	10080	10790	11471	11939	12446	12902	13343		
<b>Housing Target</b>						678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	
<b>Cumulative Housing Target</b>						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																			Totals	
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	0	44	11	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	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	80	
AL/PE 4	Land at Downingbury Farm, Maidstone Road	Pembury	25	25	25	0	0	0	0	0	0	0	0	25	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	
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	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	-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	
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	
AL/PE 8	Owlsnest Wood, Tonbridge Road	Pembury	75	75	75	0	0	0	0	35	40	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	0	0	-17	-20	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	0	0	0	0	0	0	0	15	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	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	
AL/SA 2	Sharps Hill Farm, Queen Street	Sandhurst	10	13	15	0	0	0	0	0	0	13	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	0	0	11	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	
<b>Total from Allocations</b>							0	0	130	355	523	590	713	761	733	729	715	608	579	366	405	354	339	7900	
<b>Windfall Allowance</b>										122	122	122	122	122	122	102	102	102	102	102	102	102	102	102	1548
<b>Total from Extant Planning Permissions (01 April 2021)</b>							744	859	765	286	323	153	60	17	0	0	0	0	0	0	0	0	0	0	3207



# Appendix 5 Comparisons between the SLP and Updated Housing Trajectories set out at Appendix 2 and Appendix 4 of this Statement

Table 1 - Difference Between SLP and Updated Housing Trajectories

Plan Year	SLP Trajectory Projected Housing Completions	SLP Trajectory Cumulative Projected Housing Completions	Updated Trajectory Projected Housing Completions	Updated Trajectory Cumulative Projected Housing Completions
2020/21	767	767	688	688
2021/22	932	1699	744	1432
2022/23	990	2689	859	2291
2023/24	986	3675	895	3186
2024/25	801	4476	763	3949
2025/26	885	5361	968	4917
2026/27	660	6021	865	5782
2027/28	737	6758	895	6677
2028/29	686	7444	900	7577
2029/30	623	8067	855	8432
2030/31	736	8803	831	9263
2031/32	733	9536	817	10080
2032/33	720	10256	710	10790
2033/34	661	10917	681	11471
2034/35	598	11515	468	11939
2035/36	705	12220	507	12446
2036/37	646	12866	456	12902
2037/38	391	13257	441	13343

**Table 2 - Difference Between SLP and Updated Housing Trajectories, Components of Supply**

	<b>SLP Trajectory</b>	<b>Updated Trajectory</b>	<b>Difference</b>
<b>Completions in Previous Years of Plan Period</b>	0	688	+688
<b>Allocations Without Planning Permission</b>	8274	7900	-374
<b>Extant Planning Permission</b>	3313	3207	-106
<b>Windfalls</b>	1670	1548	-122
<b>Total</b>	13257	13343	+86