

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Housing Supply and Trajectory Topic Paper for Draft Local Plan – Regulation 18 Consultation

September 2019



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Executive Summary

1. Tunbridge Wells Borough Council is currently producing a new Local Plan to guide development from 2016 to 2036. Based on Central Government's 2014 household projections data, the standard method calculation (used as a means of measuring the Council's housing delivery target) identifies a need of 13,560 homes to be delivered by 2036. Between 1st April 2016 and 31st March 2019, 1,552 dwellings were completed and, as of 31st March 2019, 3,127 dwellings have extant planning permission. With approximately 8,809 dwellings to be delivered on new site allocations in the Local Plan, with an additional 588 site allocations carried forward from the Site Allocations Local Plan (SALP; 2016) as well as a windfall allowance of 700 (50 per annum from 2022/23), the Council aims to deliver approximately 14,776 dwellings by the end of the Plan period. This figure provides for a 9% buffer over the standard method requirement.
2. This Housing Supply and Trajectory Topic Paper consequently outlines the housing delivery and phasing methodology used 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 the housing supply target of 13,560 dwellings. This methodology builds on national studies of building rates, historic local buildout rates, permissions granted and development management performance, evidence gathered through the Strategic Housing and Land Availability Assessment (SHELAA), as well as discussions with developers and housebuilders. 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.
3. In accordance with this housing delivery and phasing methodology, a housing trajectory has been produced which phases all site allocations (SALP and new), 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 2036. 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.
4. This topic paper further seeks to address how the Council will aim to meet the housing needs identified in the Housing Needs Assessment Topic Paper. This includes affordable housing provision, housing for older people, housing for people with disabilities, self-build and custom housebuilding, gypsies, travellers, and travelling showpeople, as well as the National Planning Policy Framework's small and medium-sized sites requirement.

1.0 Introduction

- 1.1 Tunbridge Wells Borough Council is currently producing a new Local Plan to guide development in the borough from 2016 to 2036. The Plan will aim to provide sufficient levels of both residential (housing) and non-residential (economic) development over the Plan period in order to meet the levels required as identified within the Plan's evidence base. Moreover, the Plan will also be required to deliver sufficient transport, open space, green and blue, and other infrastructure necessitated by the aforementioned development. An outline of the Plan's infrastructure needs can be found within the Council's latest Infrastructure Delivery Plan (IDP) which is a working document, to be updated on a frequent basis.
- 1.2 This Housing Supply and Trajectory Topic Paper will outline the overall housing targets identified by national planning policy (the standard method) sought to be delivered by the Local Plan during the Plan period and how this will be achieved. As such, this paper will seek to address the need to provide a sufficient supply and trajectory for housing delivery across the borough based on a clear and defined phasing methodology (outlined within following sections, which is used to assess the likely rates of delivery of particular sites, depending on size), drawing on existing site allocations in the borough's previous Plan's (e.g. Site Allocations Local Plan, 2016) site allocations, new site allocations, extant planning permissions, completions, as well as an annual windfall allowance to be applied. Additionally, this paper will provide an overview of the Council's current five-year housing land supply and housing delivery test positions.
- 1.3 In turn, this Topic Paper will address how the Plan (i.e. the trajectory) will meet the borough's housing needs. Indeed, these particular needs have been extensively reviewed within the Council's Housing Needs Assessment Topic Paper which draws predominantly upon the findings detailed within the Sevenoaks and Tunbridge Wells Strategic Housing Market Assessment (SHMA), 2015 ([view the SHMA 2015](#)), the Tunbridge Wells SHMA Update, 2017 ([view the SHMA Update 2017](#)), and the Borough of Tunbridge Wells Housing Needs Study (2018) ([view the Housing Needs Study](#)). In that paper, the identified diverse housing needs (including of particular groups) are evaluated in regard to their respective level of housing to be attributed as part of the wider overall housing target requirements to be delivered by the Local Plan to 2036. As such, this paper will seek to address the housing needs discussed within the Housing Needs Assessment Topic Paper and how the Local Plan will aim to deliver a sufficient and suitable level of housing provision to meet these needs. The areas of need to be accounted for in this topic paper are as follows:
- Affordable Housing;
 - Housing for Older People;
 - Housing for People with Disabilities;

- Self-Build and Custom Housebuilding;
- Gypsies, Travellers, and Travelling Showpeople; and,
- Small and Medium Sites.

2.0 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 Council’s Housing Needs Assessment Topic Paper has sought to address the above with regard to identifying the needs of housing, including by particular groups, within the borough. This Housing Supply and Trajectory Topic Paper will consequently seek to outline how these needs will be met through local planning policy (the Local Plan).
- 2.3 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”.*
- 2.4 Indeed, all sites submitted through the Council’s call for sites process (from both call for sites stages 1 and 2, as well as accepting late site submissions until 22 February 2019) 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. 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, are to consequently be put forward for allocation in the Local Plan. This Housing Supply and Trajectory Topic Paper, in-turn, will thus outline how these sites, in conjunction with already identified sites and small sites, will meet both the overall housing need and 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 that takes into account shortfall from the start of the Plan period prior to formal adoption of the Plan (i.e. from 2016 to adoption).
- 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 the site allocations to be taken forward and this is further discussed in this Housing Supply and Trajectory Topic Paper as a particular housing need that the Plan must account and accommodate for.

- 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.
- 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 Distribution of Development 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, 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 and Economic Land Availability Assessment (2014, updated 2018; PPG) 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%, once transitional arrangements have ended” ([see Housing and Economic Land Availability Assessment \(2014, updated 2018\): \(Paragraph: 062 Reference ID: 3-062-20180913\)](#)).

3.0 Local Policy Background

Local Plan housing targets

- 3.1 The Council's Core Strategy 2010 ([see Core Strategy, page 47](#)), 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 housing requirement for the borough has more than doubled. It should also be noted that, although newer household projections were released by the Government in 2016, the 2014 household projections are to be used when calculating the objectively assessed need via the standard methodology unless required otherwise by the Government ([view Housing and Economic Needs Assessment \(2015; updated 2019\): \(Paragraph: 004 Reference ID: 2a-004020190220\)](#)).
- 3.2 Based on submission of the Local Plan in 2020, the objectively assessed housing need for the borough over the Plan period to 2036 is confirmed as 13,560 dwellings (678 per year), identified by the standard method as required by the NPPF (p.20, fn.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 methodology housing figure for the borough.
- 3.3 In identifying the amount of further land to be allocated to meet the above housing need figure over the Plan period (2016-2036), account can be taken of the fact that, as of 1 April 2019, 1,552 homes have already been built since 1 April 2016 (beginning of the Plan period), 3,127 homes have planning permission, and 588 can be delivered through existing allocations within the adopted Site Allocations Local Plan 2016 (which have not yet been implemented).
- 3.4 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 at least 50 dwellings on small windfall sites per year for 14 years (700 in total from 2022-2036). This allowance, which assumes a significant reduction relative to past windfall rates due to potentially more limited land supply/opportunities, will be monitored as the Local Plan progresses. Moreover, it should be noted that this number is calculated from 2022/23, to prevent duplicating current extant consents.
- 3.5 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 and

May of each year, looking at the previous year (from 1 April to 31 March). Therefore, Table 1 will be updated in due course to reflect the outcome of the monitoring for the year 1 April 2019 to 31 March 2020.

Table 1: Housing Need 2016-2036 (as at 01 April 2019)

1	Housing need using the Standard Method (2014 household projections)	13,560	
2	Completions April 2016 to March 2019	1,552	
3	Extant planning permissions at 1 April 2019	3,127	
4	Outstanding site allocations	588	
5	Windfall allowance	700	50 per year for 14 years (2022-2036)
6	Minimum additional allocations (row 1 minus rows 2, 3, 4 and 5)	7,593	

- 3.6 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.
- 3.7 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

- 3.8 Although the Local Plan housing target per annum is currently 678, this is based on the presumption of submission of the Plan during 2020. However, for the purposes of calculating the five year housing land supply, this calculation is made on the standard method calculations from 2019 (the current year). This figure, although very similar, is 682. Likewise, when calculating the housing need for the Local Plan, the five year housing land supply uses the 2014 (rather than 2016) household projections when calculating the standard methodology.
- 3.9 The Council recently updated its five year housing land supply position for 2018/19 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

4.69 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 (2018/2019) ([view the Five Year Housing Land Supply Statement 2018/2019](#)).

Housing delivery test

- 3.10 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 (minus the 40% increase as part of the affordability ratio aspect of the calculations for the five year housing land supply and Local Plan target).
- 3.11 The Council's current position on the Housing Delivery Test is shown in Table 2 below. This indicates that for 2018, the housing delivery requirement was 1,656, whereas the delivery in the borough was at 1,457, meaning that the Council was achieving 88% of its requirement. The consequence of this as per the national planning 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 outlining ways in which delivery will be improved in the forthcoming year(s).

Table 2: Tunbridge Wells housing delivery test results 2018

Requirement			Total	Delivered			Total	HDT measurement	HDT consequence
15/16	16/17	17/18		15/16	16/17	17/18			
549	612	494	1,656	464	479	513	1,457	88%	Action Plan

Neighbourhood Plans

- 3.12 As of July 2019, the only parish in the borough to have a 'made' Neighbourhood Development Plan (NDP) is Hawkhurst (including Highgate and The Moor). However, there are a number of parishes/Neighbourhood Planning Groups developing NDPs for their areas with the consequent likelihood that there will be an increasing number of NDPs adopted throughout the Local Plan period.
- 3.13 Although there is no statutory requirement to do so in a 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 neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement” (paragraph 65).

- 3.14 Consequently, during the Plan period, there is an opportunity for NDPs to further allocate small and medium sized sites in their respective areas that, based on the presumption that they are separate site allocations to those in the Council’s Local Plan, could assist in boosting housing supply in the borough. Should any forthcoming NDP therefore allocate any such sites, the Council’s housing delivery and trajectory figures will be updated accordingly in subsequent annual revisions.

4.0 Housing Delivery and Phasing Methodology

Introduction: housing delivery methodology Tunbridge Wells

- 4.1 The Tunbridge Wells Borough Draft Local Plan 2019 will aim to meet the target of delivering 13,560 new homes between 2016-2036. The Council is committed to taking a proactive approach to housing delivery in the borough and engages with the development industry and other delivery partners. The Council is required to monitor the progress of housing completions and to set out a five year supply of housing land coming forward.
- 4.2 As part of this monitoring the Council carries out an assessment of when housing, either with planning permission or contained within the new Local Plan (when adopted), is expected to be built. The Council is required to publish its assessment and demonstrate the number of dwellings expected to be built in each year of the Local Plan (when adopted).
- 4.3 The Council has produced this phasing methodology to help inform the annual assessment 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 form the Council's phasing 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:
- Letwin Report and Independent Review of Buildout Rates (Letwin, 2018);
 - Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? (Litchfields, 2016);
 - Housing Supply Research (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;
 - 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, has made some interesting comments on completion rates within the housing sector. The review identified two major constraints that currently affect the housing sector:
- a) 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.

- b) The construction industry; it is thought that if buildout 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 across which the development process was reviewed;
 - 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; 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.

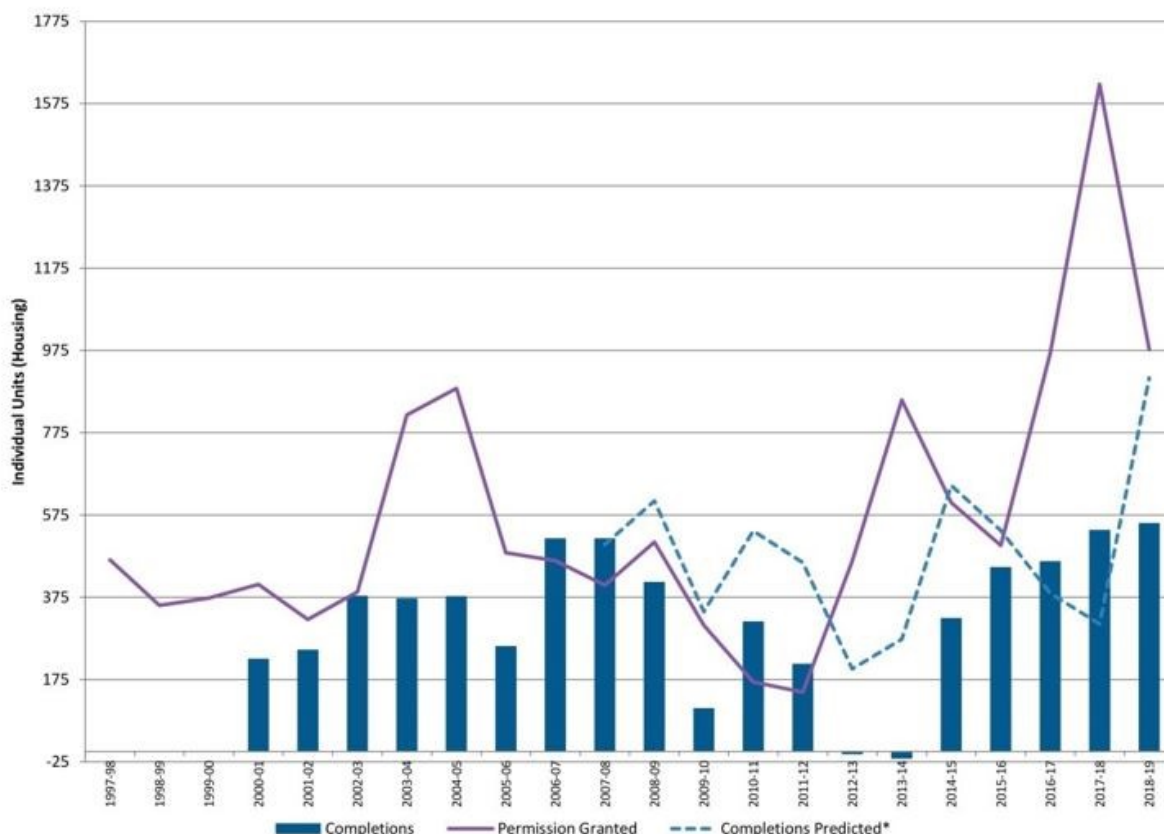


Figure 1: Annual housing completions and permissions granted for housing

- 4.13 Figure 1 shows that both the level of completions and permissions granted for housing have fluctuated annually since 1997-98. There has, however, recently been an overall increase in both permissions and completions. This can largely be attributed to an increase in the number of dwellings committed to through planning permissions, in some instances following allocations made through the Adopted Site Allocations Local Plan, 2016. There is also a noticeable lag time between peaks in the number of units approved through planning and the number of units constructed. If explored further this relationship could help to provide information on the build out rates across the borough.
- 4.14 Further work has been carried out using this historic completions data to calculate the average length of time between planning permission being granted, completions starting on site and completions finishing on site. A sample size of 1,090 planning applications across 11 years was used to calculate the values that follow. To increase the statistical robustness of the dataset 42 outlying values have been removed, this has resulted in a final sample size of 1,048 planning applications across 11 years.
- 4.15 Figure 2 below displays information on the average amount of time (in years) between a planning permission 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.

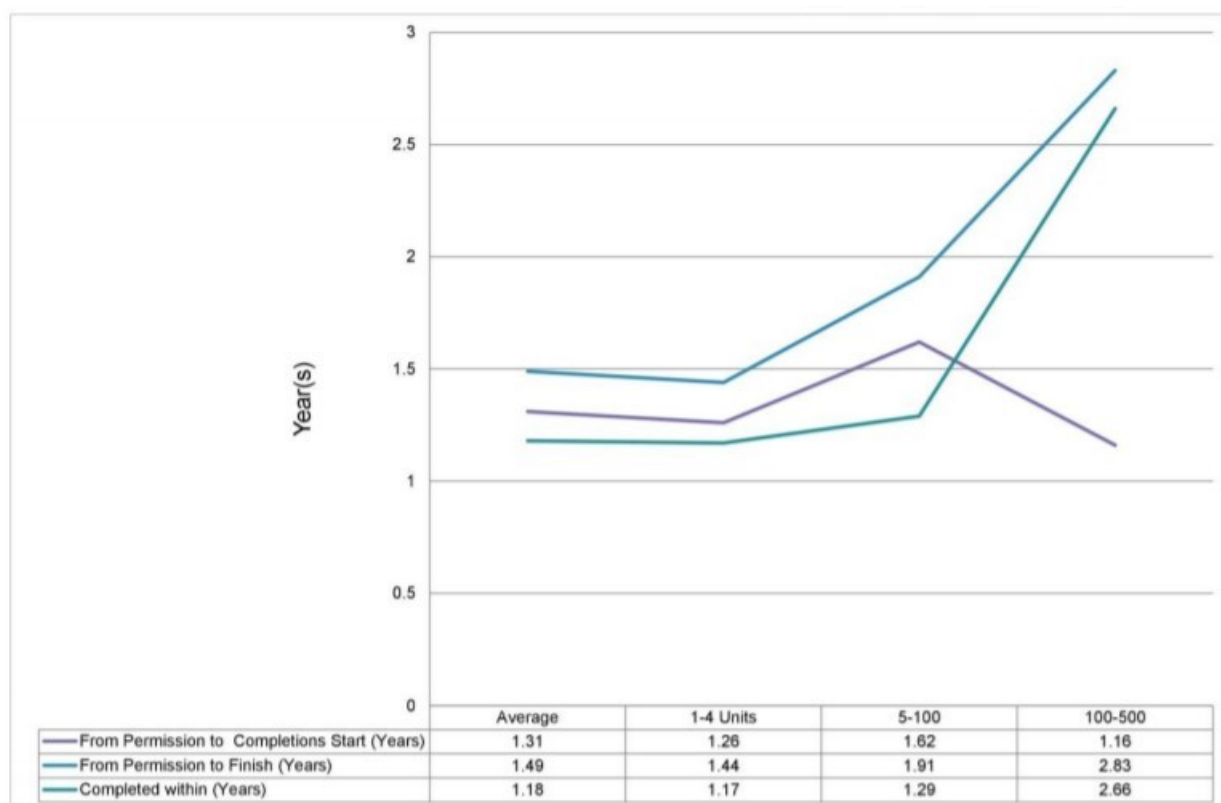


Figure 2: Average (mean) construction rates across the borough

- 4.16 Figure 2 displays some interesting trends in the time taken for construction across the different scale of sites within the borough. The patterns are on the whole as national evidence would suggest, the length of time taken for each stage increases as the size of site gets larger.
- 4.17 A notable anomaly in this dataset is the length of time between permission being granted and the start of completions on site (the purple line in Figure 2), 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 entered into considerable dialogue with the Council; therefore, construction can start more swiftly than on smaller sites. 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.
- 4.18 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.

- 4.19 In addition to the evidence discussed above the Council considers that as a local planning authority 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 the Council responsible for particular sites/developments, pro-actively engaging with developers at the pre-application stage, as well as with consultees (responsible for advice on the discharging of planning conditions) and infrastructure providers and ensuring there is clear and ongoing communication with developers.
- 4.20 The Council has also committed to implementing the use of planning performance agreements and providing new additional resource 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 buildout rates.

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

- 4.21 The Council has considered and prepared evidence on building rates and lead in times as part of the new Draft Local Plan preparations. As part of the site allocations process there has been significant dialogue with site promoters and developers on the expected buildout rates achievable at a variety of allocation sites across the borough.
- 4.22 Information on site expectations, availability, predicted start and finish times has been collected for all sites allocated through the SHELAA.
- 4.23 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

- 4.24 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.
- 4.25 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 buildout times in the current housing market.

- 4.26 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 1 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.
- 4.27 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 land supply. It is intended that this will be updated following consultation with developers.
- 4.28 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

- 4.29 The following section sets out which year within the 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.

- 4.30 The types and scales of site size have been selected to reflect both the anticipated new Draft Local Plan allocations and those historically coming forward as planning applications. The site sizes are also comparable to those used in the most commonly referred to national studies, which allows 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)

- 4.31 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:
- 4.32 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;
 - 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)					

Completion within:	Year 1	Year 2	Year 3	Year 4	Year 5
Full permission					
Outline permission					
No planning activity					

Small sites (five to 99 dwellings)

4.33 The following assumptions have been made about sites between five and 100 dwellings in size:

- Completion is assumed to be within five-years of permission being granted, unless information suggests otherwise, e.g. 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 treated as a full application;
- As with smaller sites if demolition is included within the proposal 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					

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

Medium sites (100 to 500 dwellings)

4.34 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 onsite 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 begin 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 dependent 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)

4.35 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 draft 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 time 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)

- 4.36 The Council does not currently have any sites that fall within this category (allocated nor extant planning permission); however, garden settlement proposals in the draft 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.
- 4.37 It is likely that for sites of this size that the Council will have detailed phasing/development 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 fairly quickly from the granting of outline permission, 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 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)

- 4.38 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 land supply are subject to extenuating circumstances whereby delivery will be accelerated or delayed unexpectedly it will seek clarification from developers and homebuilders.
- 4.39 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.
- 4.40 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

- 4.41 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).
- 4.42 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.
- 4.43 National studies have shown that on sites where 30% or above affordable housing is proposed that build rates fall within the higher end of the national average (NLP Start to Finish Fig. 8). 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.
- 4.44 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 been in excess of 120 units per annum. Where urban extensions have been proposed through the new Draft Local Plan and evidence presented suggests that it may be plausible higher delivery rates will be applied.
- 4.45 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.). 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: Peak build-out rates (per annum)

Site size	Local evidence (TWBC historic records)	Average annual potential yield (NLP)	Average annual potential yield (Letwin Review)	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 73	Circa. 60	No data	TBC	70
200-299	Up to 55, average 33	Circa. 60	No data	TBC	70
300-399	Up to 104, average 65	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
1000-2000	No data	Circa. 120, up to circa. 205	128	TBC	128
2000+	No data	161, up to circa. 310	299	TBC	299

4.46 The build out rates above have been obtained from historic records (details in Appendix 2), national studies (NLP), Letwin Review analysis ([view Independent Review of Build Out Rates: Annexes \(June 2018\): 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 across the borough for the purpose of producing the Council's housing trajectory.

4.47 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, 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 73 units per annum have historically been delivered locally on sites of this size; as a result, 70 per annum is considered appropriate for the means of calculating an estimated delivery per annum in the Local Plan housing trajectory.

- 4.48 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 indicating that 61 units per annum may be delivered on sites of this size (however, this is based on a general 6.1% figure of sites of size 0 to 999 (dataset used only had data for sites of 500 units or more)). However, taking into consideration the national studies/Letwin Review 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.
- 4.49 As aforementioned, both national studies and the Letwin Review indicate that larger schemes generally have higher build-out/delivery rates than smaller schemes. It is consequently proposed that, due to the Letwin Review 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; 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

- 4.50 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.

- 4.51 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 (2016-2036). Consequently, the trajectory takes into account all completions and extant planning permissions from 1st April 2016 to 31st March 2019, (existing) Site Allocations Local Plan (SALP) site allocations, new Local Plan site allocations, 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 (13,560), the Council, when subtracting completions, extant planning consents, existing SALP site allocations, and windfalls, must plan for a minimum of 7,593 (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 Local Plan very quickly addresses the shortfall in housing delivery before 2018/19 predominantly through extant planning permissions before the housing delivery from site allocations begins. Although there is a peak in housing delivery from site allocations between years 2023/24 to 2025/26, there is generally a consistent and steady supply of delivery from allocations throughout the Plan period that will ensure that the housing target of 13,560 dwellings is met.

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	19	20
		Actual Year	2016/17	2017/18	2018/19	2019/20	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
Trajectory Table	Net Housing Completions	Confirmed completions within the Plan period as of 31 March 2019	461	537	554																	
	Projected Housing Completions	Projected housing completions from 1 April 2019				742	1144	718	760	834	994	1112	918	784	760	748	639	682	619	603	583	584
	Cumulative Housing Completions	Cumulative projected housing completions within the Plan period based on projected completions	461	998	1552	2294	3438	4156	4916	5750	6744	7856	8774	9558	10318	11066	11705	12387	13006	13609	14192	14776
	Housing Target	The annual housing target based on the standard methodology	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678	678
	Cumulative Housing Requirement	The cumulative annual housing target based on the standard methodology	678	1356	2034	2712	3390	4068	4746	5424	6102	6780	7458	8136	8814	9492	10170	10848	11526	12204	12882	13560
	Outstanding Balance Against Target	The number of dwellings above or below the cumulative housing requirement	217	358	482	418	-48	-88	-170	-326	-642	-1076	-1316	-1422	-1504	-1574	-1535	-1539	-1480	-1405	-1310	-1216
	Annualised Delivery Target	The number of completions needed to meet any shortfall spread over the next 5 years	721	750	774	762	668	660	644	613	550	463	415	394	377	363	371	370	308	210	23	-538

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
Site Allocations Local Plan (2016) Allocations																											
AL/RU 1	Lifestyle Motor Europe, Langton Road	Rusthall	Allocation in LP and included in Monitoring as 15	12.41	15	15	15								15												
AL/RT W29	Former Gas Works, Sandhurst Road	RTW		1.78	170	170	170							42	42	43	43										
AL/RT W20	Tunbridge Wells Telephone Engineering Centre	RTW		1.08	50	50	50							25	25												
AL/RT W30	Land at Medway Road	RTW	Higher figure used to reflect recent planning approval granted for 35 units on site	0.23	35	35	35							35													
AL/RT W31	123-129 Silverdale Road	RTW		0.27	13	13	13							13													
AL/RT W8	Site of Lifestyle Ford	RTW	Allocation in LP for 80, included in Monitoring as 30. Remaining 50 phased after initial delivery of 30 in accordance with the Council's phasing methodology.	0.45	80	80	80							30	44	6											
AL/CRS 9	Land Adjacent to the Crane Valley	Cranbrook		19.09	200	250	225						50	70	80	25											

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
New Local Plan Housing Allocations																											
AL/BE1	Land at Walkhurst Road	Benenden	Included under permission (16/504891/FULL)	0.71	12	12	0																				
AL/BE2	Land adj New Pond Road (Uphill)	Benenden		0.78	18	20	19								19												
AL/BE3	Feoffee Cottages, Walkhurst Road	Benenden	Current submitted planning application in for 25 (19/00822/HYBRID). To be allocated for 23-25 units (24 mid- point). This site is to be phased in the trajectory based on site promoter response regarding expected build-out rates. Consequently phased first out of Benenden allocations due to planning activity.	1.46	23	25	24							22	2												
AL/BE4	Land at Benenden Hospital	Benenden	Allocated for 66-72 - with existing (net) 22 in baseline below (12/03130/EIAMJ). Remaining 47 expected to be delivered from year following expected delivery of extant planning permission. Trajectory has therefore subtracted 22 from range alongside allocation. Submission date expected for planning application has already passed based on site owner correspondence and	12.26	44	50	47									32	15										

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
			therefore following phasing methodology. LP adoption also delayed by 1 year since correspondence received. Expected build-out rates are reflective of emails from site promoters received.																								
AL/BM1	Brenchley Rd, Coppers La & Maidstone Rd LS27	Matfield		2.84	30	45	38									38											
AL/BM2	Matfield House orchards and land	Matfield		2.95	20	30	25										25										
AL/BM3	Ashes Plantation	Matfield	Expected build-out rates are reflective of emails from site promoters received.	2.95	30	60	45								40	5											
AL/BM4	Land at Maidstone Road	Matfield		1.65	11	15	13										13										
AL/CA1	Tudeley	Tudeley	1900 units phased for within the Plan period with balance to be phased post-2036	157.47	2500	2800	2650										150. 0	150. 0	150. 0	150. 0	150. 0	150. 0	200. 0	200. 0	200. 0	200. 0	200. 0
AL/CRS 1	Land adj Wisley Farm	Cranbrook	Submission date expected for planning application has already passed and therefore following phasing methodology. LP adoption also delayed by 1 year since correspondence received.	0.66	15	20	18									18											

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
AL/CRS 2	Big Side Playing Field	Cranbrook		4.64	10	15	13													13							
AL/CRS 3	Jaegers Field	Cranbrook	Expected build-out rates are reflective of emails from site promoters received.	2.75	30	35	33									20	13										
AL/CRS 4	Turnden Farm	Cranbrook	Allocated for between 160-170 units. However, 36 dwellings already included under planning permission 18/02571/FULL. This figure is therefore deducted from the trajectory figure (i.e. mid-point of 165-36 = in trajectory for 129 units). Expected build-out rates are reflective of emails from site promoters received.	27.64	124	134	129							60	60	9											
AL/CRS 5	Land adj Cranbrook Primary	Cranbrook		3.80	35	45	40														40						
AL/CRS 6	Gate Farm Hartley	Cranbrook	Expected build-out rates are reflective of emails from site promoters received. Further response from site promoter of site 59 indicates delivery from 2020/21 with likely planning application 2019. However, due to masterplan requirement and wider site subject to other landownership, completions have been phased to begin in 2023/24 (mid-point between expected	6.12	90	90	90								30	30	30										

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
			submission of planning app for site 59 and when completions would be expected as based on our phasing methodology).																								
AL/CRS 7	Land off Golford Road	Cranbrook		8.38	150	150	150											70	70	10							
AL/CRS 8	Former Cranbrook Engineering Site and Wilkes Field	Cranbrook	Included under permission for 28 units (16/503953/FULL)	0.62	28	28	0																				
AL/CRS 12	Land on east side Mill Lane	Sissinghurst	Expected build-out rates are reflective of emails from site promoters received.	0.86	5	10	8								5	3											
AL/CRS 13	Land east Camden Lodge	Sissinghurst		2.20	40	40	40										40										
AL/CRS 14	Land south of The Street	Sissinghurst	Phased for 2022/23 due to planning activity.	0.58	20	20	20							20													
AL/CRS 15	Oak Tree Farm, Wisley Pound	Sissinghurst	Since no planning activity, following phasing methodology	1.01	15	20	18								18												
AL/CRS 16	Land at Boycourt Orchards, Wisley	Sissinghurst		0.99	20	25	23									23											
AL/FR1	Land at Cranbrook Road	Frittenden		1.53	25	30	28								28												
AL/GO1	Land east of Balcombes Hill	Goudhurst	Phased for 2022/23 due to planning activity.	1.07	10	15	13							13													

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
AL/GO2	Land at Triggs Farm	Goudhurst	Included under permission (17/02765/OUT)	1.50	11	11	0																				
AL/HA1	Hawkhurst golf club	Hawkhurst	Expected build-out rates are reflective of emails from site promoters received.	19.46	400	450	425										60	60	60	60	60	60	60	5			
AL/HA2	The White House, Highgate Hill	Hawkhurst	Phased for 2022/23 due to planning activity.	0.61	15	15	15							15													
AL/HA3	Land east Hearten oak	Hawkhurst	Although now an extant planning permission (18/02165/FULL), the number of units to be delivered is to be input alongside the allocation as it was consented post-monitoring period (2018/19) for extant planning permissions below. Expected build-out rates are reflective of emails from site promoters received. Phased for 2020/21 due to FULL planning permission.	2.36	28	28	28					25	3														
AL/HA4	Land at Fowlers Park	Hawkhurst	Expected build-out rates are reflective of emails from site promoters received.	9.01	100	100	100										50	50									
AL/HA5	Brook House	Hawkhurst	Included under permission (17/03780/OUT)	0.64	25	25	0																				
AL/HA6	Land off Copthall Avenue and Highgate Hill	Hawkhurst		6.55	75	79	75								44	31											
AL/HA9	Land at SanTERS Yard	Hawkhurst	Expected build-out rates are reflective of emails from site promoters received.	2.44	38	38	38								20	18											

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
			Since no planning activity, following phasing methodology.																								
AL/HO1	Land adj Furnace Lane/Gibbett Lane	Horsmonden	Expected build-out rates are reflective of emails from site promoters received. Phased for 2022/23 due to planning activity.	1.82	45	55	50							35	15												
AL/HO2	Land south Brenchley/west Fromandez 162	Horsmonden	Expected build-out rates are reflective of emails from site promoters received.	3.48	80	100	90									60	30										
AL/HO3	Land to the east of Horsmonden	Horsmonden	Expected build-out rates are reflective of emails from site promoters received.	17.59	100	150	125										8	30	30	30	27						
AL/LA1	Land to the west of Spray Hill	Lamberhurst		6.04	25	30	28								28												
AL/LA2	Misty Meadow, Furnace Lane	Lamberhurst		10.38	25	30	28									28											
AL/PE1	Land rear of High Street and west of Chalket Lane	Pembury		6.74	70	80	75											44	31								
AL/PE2	Land at Hubbles Farm and south of Hastings Road	Pembury	Submission date expected for planning application has already passed and therefore following phasing methodology. LP adoption also delayed by 1 year since correspondence received. Expected build-out rates are reflective of emails from site promoters received.	5.49	90	90	90								60	30											

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
AL/PE3	Land north of the A21, south and west of Hastings Road	Pembury	Expected build-out rates are reflective of emails from site promoters received - as they fall within TWBC proposed methodology, phasing methodology is used.	4.78	90	90	90													44	44	2					
AL/PE4	Land at Downingbury Farm, Maidstone Road	Pembury	Since no planning activity, following phasing methodology.	4.76	25	25	25									25											
AL/PE5	Land at Sturgeons	Pembury	Included under permission (17/00756/FULL)	2.66	19	19	0																				
AL/PW1	Paddock wood	Paddock Wood		V Large	4000	4000	4000									333. 0	333. 0	334. 0	333. 0	333. 0	334. 0	333. 0	333. 0	334. 0	333. 0	333. 0	334. 0
AL/PW2	Paddock Wood Town Centre	Paddock Wood	This is to be included under PW1		0	0	0																				
AL/PW3	Land at Mascalls Farm	Paddock Wood	Potential for 115 dwellings in addition to extant planning permission (17/03480/FULL) below, to be phased in following years to those in monitoring in accordance with the phasing methodology	Larger than 1	115	115	115									70	45										
AL/RT W3	Former Cinema Site, Mount Pleasant Road	RTW	Included under permission for 108 units (17/02262/FULL)	0.80	100	100	0																				
AL/RT W4	Torrington/Vale Avenue AoC	RTW		1.19	100	100	100													70	30						
AL/RT W7	Land at Goods Station Road	RTW		0.17	10	15	13														13						

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
AL/RT W11	former Plant & Tool, Eridge Road	RTW	Potential for 37-60 C3 units in allocation; however, the site is promoted for retail use only and therefore residential not counted towards trajectory (however allocation will still allow for potential C3 as previously established)	0.52	37	60	0																				
AL/RT W16	Land at wevale Garden Centre	RTW	A figure has not been given because the amount of residential is still to be determined through further planning application		0	0	0																				
AL/RT W17	Land at 36-46 St John's Road	RTW	Included under permission for 89 units (17/00731)	0.50	65	65	0																				
AL/RT W18	land at Spratsbrook	RTW	Expected build-out rates are reflective of emails from site promoters received.	15.82	270	270	270									70	70	70	60								
AL/RT W21	Land at Culverden Stadium	RTW		3.60	30	30	30																	30			
AL/RT W22	Land at Bayham Sports Field west	RTW		1.94	20	25	23																23				
AL/RT W24	Land at Cadogan Sports Field	RTW		1.67	30	40	35								35												
AL/RT W25	Land at Colebrook Sports Field	RTW		4.22	60	60	60															44	16				
AL/RT W26	Land at Cemetery Depot	RTW		0.52	20	20	20																		20		

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
AL/RT W27	Land At Hawkenbury Farm Hawkenbury Road Royal Tunbridge Wells Kent	RTW	Included in Planning Permissions below (18/03951/FULL). Any increases in site yield as part of current application, e.g. for an additional 8, will potentially be added to permissions at Reg 19 stage if consent is granted		0	0	0																				
AL/RT W32	Land at Beechwood Sacred Heart School	RTW	Included under permission for 69 (C2) units (16/07697/FULL)	0.67	69	69	0																				
AL/SA1	Land on south of Sayville, Rye Road	Sandhurst		1.03	10	15	13								13												
AL/SA2	Land adj Old Orchard	Sandhurst	Expected build-out rates are reflective of emails from site promoters received	0.35	10	12	11								10	1											
AL/SO1	Southborough Hub	Southborough	Included under permission (16/06081/HYBRID)		0	0	0																				
AL/SO2	Speldhurst Road Allotments	Southborough	Included under permission (18/02618/OUT)		0	0	0																				
AL/SO3	Land at Mabledon & Nightingale	Southborough	Expected build-out rates are reflective of emails from site promoters received - as they fall within TWBC proposed methodology, phasing methodology is used.	No Area	50	120	85								70	15											
AL/SP1	land west Speldhurst Rd/Ferbies	Speldhurst	Expected build-out rates are reflective of emails from site promoters received.	0.79	15	20	18								11	7											

								1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
								2016 /17	2017 /18	2018 /19	2019 /20	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
Ref	Site address	Settlement	Note (last updated 24/07/19)	Site size (ha)	LP Min	LP Max	Average																				
Total	Total from allocations							0	0	0	0	25	113	380	644	823	992	868	734	710	698	589	632	569	553	533	534
Windfall allowance	Windfall allowance 50 per year after year 3													50	50	50	50	50	50	50	50	50	50	50	50	50	50
Total PP	Total from PP							0	0	0	742	1119	605	330	140	121	70	0	0	0	0	0	0	0	0	0	0

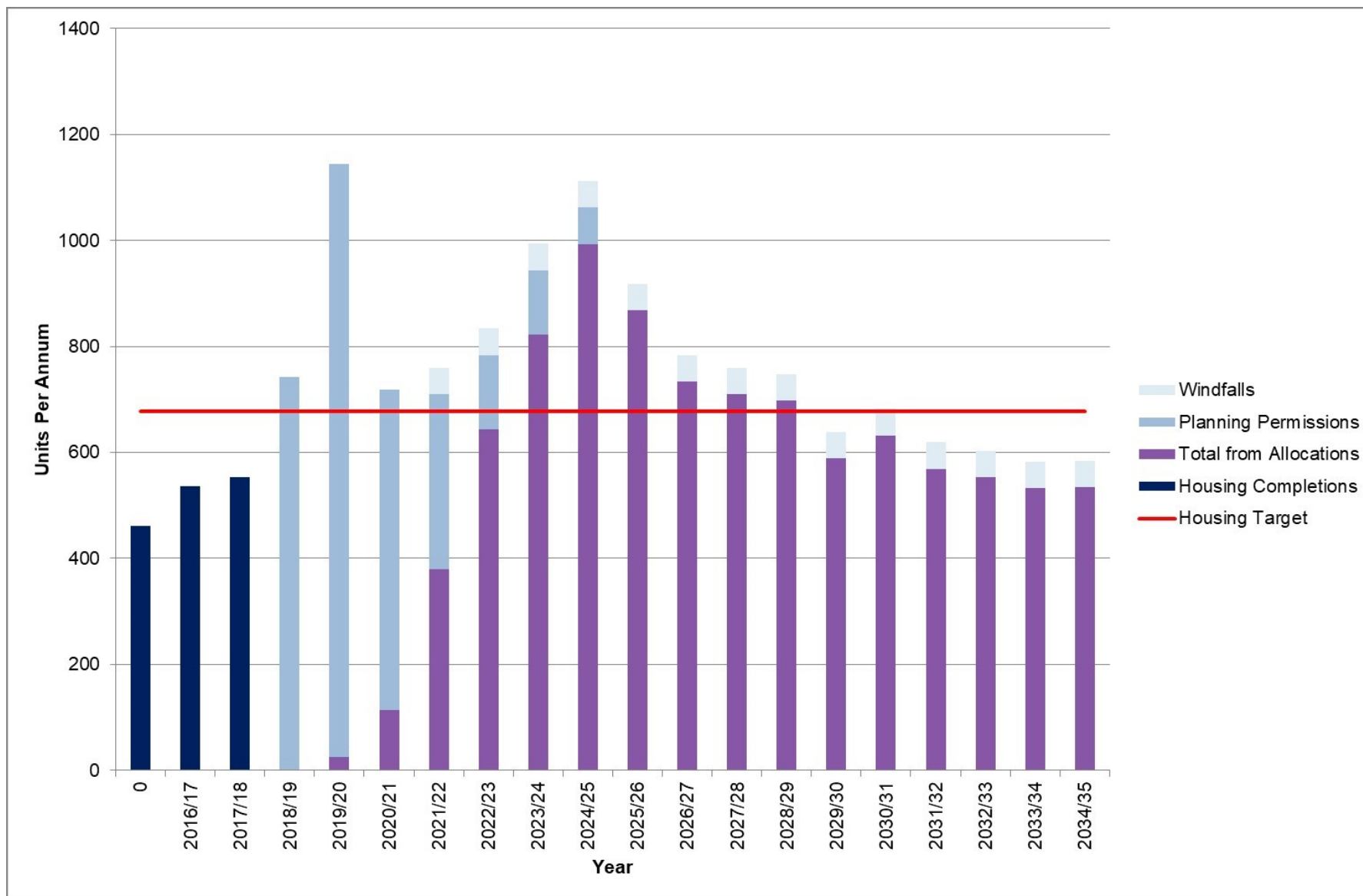


Figure 3: Housing Trajectory Chart

Extant planning permissions

- 5.6 The trajectory above includes housing figures from sites that benefit from planning permission for new housing as of 31st March 2019. Details of these sites are set out in the Five-Year Housing Land Supply Statement 2018/19. These total an additional 3,127 dwellings across the plan period and have been included in the trajectory as per their phasing in the Council's five year housing land supply calculations. This phasing either relies on direct advice from site owners/housebuilders/developers or if it has not been possible to obtain this information the housing delivery and phasing methodology set out above.

Site Allocations Local Plan site allocations

- 5.7 A proportion of the site allocations within the trajectory is made up of sites that are being carried forward from the 2016 Site Allocations Local Plan. These are sites that have not yet been granted planning permission but that have been re-assessed as being suitable and available for housing. In total there are seven sites contributing 588 units that are deemed suitable for re-allocation. The phasing of these sites either relies on direct advice from site owners/housebuilders/developers or, if it has not been possible to obtain this, will be based on the housing delivery and phasing methodology. Site allocations from the 2016 Site Allocations Local Plan that are not deemed to be either suitable or available for housing will not be reallocated and have therefore not been counted within the trajectory.
- 5.8 For the avoidance of doubt, site allocation AL/RTW8 is a site allocated in the Site Allocations Local Plan that is to be re-allocated in the new Local Plan. Although this site was initially expected to deliver 30 units in total, this figure has been revised to 80 overall. However, as the initial 30 units have been counted in monitoring as part of the five year housing land supply for completion in year 2022/23, the remaining 50 units have therefore been phased in the following two years in accordance with the phasing methodology in this paper.
- 5.9 It should also be noted that new site allocation AL/PW3 (to be allocated in the Site Allocations Local Plan under policy AL/PW 4) currently has planning permission (17/03480/FULL) although has potential to deliver an additional 115 dwellings. Therefore, in accordance with the phasing methodology, these additional dwellings have been phased for delivery from 2025/26 following expected delivery of the planning consent as per the 2018/19 monitoring.
- 5.10 Although initially allocated for 20 units, the existing allocation AL/RTW 14 in the Site Allocations Local Plan at Medway Road (new site allocation AL/RTW30) is to be re-allocated for 35 units in accordance with the latest approved planning application (19/00365/FULL), phased for delivery in 2022/23 to reflect the Council's phasing methodology.

New Local Plan site allocations

- 5.11 As aforementioned, the balance of the Council's housing requirement will be met by new site allocations for housing. In total, the Council is proposing to allocate 65 new sites with residential yields which will deliver approximately 8,809 dwellings (with new site allocations with extant planning permission excluded from this figure to prevent double counting). The phasing of these sites within the trajectory has been as per the methodology detailed in the housing delivery and phasing methodology. Where there are several allocations 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. Where possible this has been reflected within the trajectory below; however, to ensure 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. A more detailed consideration of when several allocations are to be delivered in an individual settlement is provided below.
- 5.12 The expected phasing and build-out rates of new site allocations in the Local Plan are underpinned by the phasing methodology outlined within this paper. As such, all new site allocations are expected to deliver at the build-out rates shown in Table 8, based on local evidence, national studies and research analysis in the Letwin Review.
- 5.13 As per the phasing methodology, it is assumed that if a site allocation of site size 5-99 units has no current planning activity as per the current year (2019/2020), then it is assumed that the earliest date at which such site allocations will begin delivery, unless agreed otherwise due to site-specific circumstances, is from 2023/24 (year 5) to take into account phasing timeframes such as achieving planning permission, Section 106 agreements, etc.. For those site allocations of site size 5-99 units, as per the phasing methodology, that currently have planning activity (such as the site being actively promoted and/or with pre-app discussions underway), then it is assumed that the earliest date at which such site allocations will begin delivery, unless agreed otherwise due to site-specific circumstances, is from 2022/23 (year 4). For site allocations of site size 100-500 units, it is assumed that, regardless of whether there is planning activity or not, delivery will begin in year 6 (2024/25).
- 5.14 Where a range has been applied to the yield of site allocations in the Local Plan, for 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 50 and 100 units in the Local Plan has a figure of 75 applied within the trajectory.
- 5.15 Where a site allocation site is subject to an extant planning consent, for the purpose of accurately filling in the trajectory, the housing numbers associated with this allocated site are to be input alongside the extant planning consent/planning application reference with a figure of 0 applied alongside the allocation number (unless the allocation is to provide additional units on a larger overall site that incorporates the extant planning consent; for example, site allocation AL/CRS4 - the

housing number phased in the trajectory for this site has taken into account, and subtracted, the housing number to be delivered from the extant planning consent) to ensure that figures are not double counted. Sites that have extant planning consents that are allocated have been allocated to ensure that the extant planning consents (and requirements should the consent expire) are fulfilled within the Plan period. The only exception to this is site allocation AL/HA3, which received planning consent post-April 2019 (when extant planning consents were monitored) and therefore the site's housing yield has been input alongside the site allocation number.

- 5.16 Site allocations within the same settlement, taking into consideration their respective specific size and location, have been phased at separate times in the trajectory to ensure that not all site allocations within any settlement are delivered at the same time. Furthermore, on 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. Also, as in the case of site allocation AL/HO3 (land to the east of Horsmonden), the phasing includes a small initial figure to take into account the likelihood that the south-eastern parcel of the site allocation may come forward separately through an individual planning application.
- 5.17 There are, however, exceptions where more than one site allocation in a single settlement may come forward at any one time. For instance, site allocations CRS 12 and CRS 15 are both of site-size between 5-99 units which, based on the phasing methodology, can provide up to 44 units per annum. As both sites collectively deliver only 26 units (i.e. 8 and 18, respectively) over 1-2 years, they have been phased to begin delivery in the same year (this principle is applied in all settlements across the borough). This rule also applies to the balance of larger sites being delivered at the latter stages of site development which is considered suitable to coincide with another small site delivery within the same settlement. Moreover, there may be instances where there is no other alternative than for more than 1 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 (as discussed further on). An example of this being the case is in Hawkhurst where site allocations AL/HA6 and AL/HA9 (2023/24), as well as AL/HA2 and AL/HA4 (2025/26), are phased to begin delivery in the same year.
- 5.18 For the avoidance of doubt, it is noted that the 'CRS' site allocations (i.e. Cranbrook and Sissinghurst) have been phased in the trajectory under the assumption that Cranbrook, Sissinghurst, and Hartley (i.e. AL/CRS6) are separate settlements and therefore each settlement may have development being delivered at the same time.
- 5.19 For clarification, although policy wording for site allocation AL/RTW11 allows for potential residential provision of between 37 and 60 dwellings, it is acknowledged that the site owner is currently promoting the site for retail use only and therefore the potential residential yield is to not be included within the trajectory (counted as

0). This may therefore be subject to change, dependent on any potential change in the way that/use the site is to be promoted for.

- 5.20 It is to also be noted that for site allocation BE3, although it is to be allocated for 25-30 units (mid-point of 28 units), 25 are phased in the trajectory based on the current submitted planning application (19/00822/HYBRID) as are the site promoter's expected build-out rates (see below). This allocation is to be phased first out of the allocations in Benenden due to planning activity. Additionally, for site allocation AL/BE4, the Local Plan policy identifies a net range of 64-74 dwellings. However, there has been an implemented 24 dwellings (net 22; under planning permission 12/03130/EJAMJ), and therefore has been subtracted from the overall 64-74 figure. The remaining figure (47 units) in the trajectory is the midpoint of the resultant 42-52 figure.
- 5.21 Unless taking into account circumstances justifying the departing from the proposed annual delivery rate, small and medium-sized site allocations are expected to deliver the proposed annual yield as outlined within the preceding delivery and phasing methodology section. The balance of development will be expected in the final year; for example, a site of size 100 dwellings will expect to deliver 70 units in the first year of completions, with 30 delivered in the following year.
- 5.22 During spring 2018, the Council carried out an informal consultation with site promoters (to all those who submitted a site in the Call for Sites) 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 a delivery rate, this has taken precedent over the proposed build-out rates in the phasing and methodology section of this Paper. The Council, bearing in mind the delay in expected submission date of the Local Plan by a year since the exercise was carried out, has also endeavoured to accommodate site allocations site promoters' expected planning application submission dates. Consequently, those sites expected to be brought forward early on in the Plan period have been phased early on, whereas those that indicated a later submission, or of which have not been provided with an indicative date (or simply a range for the duration of the Plan period is provided), have been phased in the trajectory for after those where an indicative date has been provided. As aforementioned, due to the delay in expected submission of the Local Plan, those site promoters who indicated a planning application submission date of 2018-2019, but for which there has been no planning activity to date, will be contacted again in order to ascertain whether the Council's proposed phasing of their site in the trajectory is acceptable.
- 5.23 For clarification, site allocation AL/CRS6 has been phased for 2023/2024 as this is the mid-point between the year identified by the landowner for call for sites site 59 (which forms part of the overall site allocation) for the beginning of completions and the year for first completions as identified by the Council's phasing methodology. This mid-point has been used to take into account the fact that the overall site is subject to a masterplan requirement and multiple landownership.

- 5.24 For the larger site allocations proposed in the Local Plan (i.e. Tudeley and Capel/Paddock Wood), a much larger annual delivery/build-out rate is expected than on smaller sites as based on the phasing methodology in Table 8 and further analysis:
- For Tudeley, it is proposed that for the first 6 years of delivery from 2025/26, 150 units are expected per annum, increasing to 200 per annum during the years after. Although slightly higher than that proposed in the phasing methodology, further analysis of the data analysed in the Letwin Review indicates that, for sites between 2,000 and 4,000 units, 181 units are generally delivered per annum. Consequently, as Tudeley is expected to in total deliver up to 2900 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 (2036+);
 - For Capel/Paddock Wood, it is proposed that 333-334 units are delivered per annum from 2024/2025. Although this figure is higher than that identified in the phasing methodology (299), further analysis in the Letwin Review indicates that for large sites with more than 8 housebuilders, generally 333 units per annum are expected to be delivered. Although the Council cannot at this stage confirm the number of housebuilders that will deliver this site (although there being a high possibility that there will be 8 or more), due to the nature of the Capel/Paddock Wood allocation, which includes land controlled by a number of different developers and the opportunities for land within particular parcels to be provided from the original developer to others (e.g. as a small parcel), there is consequently a likelihood that one housebuilder may deliver units on more than one parcel at any one time, meaning that the expected delivery of 333 units per annum is considered suitable.

Windfalls

- 5.25 The Council has put forward a windfall allowance of 700 across the Local Plan period whereby an estimated 50 per year will be delivered from 2022/23 (counted from this year onwards to exclude/to prevent double counting extant planning permissions). 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.
- 5.26 This windfall allowance is based on robust evidence from past windfall completion rates in the borough. Including negative delivery (i.e. where demolitions reduce the overall numbers), Table 10 illustrates that, exclusive of the 3 anomalous years (2012-2014), an indicative windfall contribution (measured here as 1-9 units) is around 37.77% (on average) of the overall completions per year. The average number of units delivered on sites of 1-9 units per year, excluding the same anomalous years (due to a high level of demolitions), is around 132 units.

Table 10: Tunbridge Wells windfall (sites of 1-9 units) completions (2006-2019) including negative delivery

Year	1-9 units completions	Total completions	% completions
2006/07	124	517	23.96
2007/08	155	517	29.98
2008/09	131	411	31.87
2009/10	100	104	96.15
2010/11	107	315	33.97
2011/12	76	212	35.85
2012/13	84	-5	-1680.00
2013/14	48	-16	-300.00
2014/15	95	323	29.41
2015/16	145	447	32.44
2016/17	194	461	42.08
2017/18	158	537	29.42
2018/19	167	551	30.31

5.27 Analysing this data further, Table 11 represents the overall indicative windfall contribution on sites of 1-9 units per year with negative delivery in the anomalous years above excluded (i.e. not taking into account demolitions). This indicates that around 44.47% of total completions have been on what would be considered windfall sites, with around 144 units on these sites of 1-9 units being delivered per year on average.

Table 11: Tunbridge Wells windfall (sites of 1-9 units) completions (2006-2019) excluding negative delivery

Year	1-9 units completions	Total completions	% completions
2006/07	169	563	30.02
2007/08	186	548	33.94
2008/09	157	438	35.84
2009/10	130	142	91.55
2010/11	125	333	37.54
2011/12	109	245	44.49
2012/13	110	137	80.29

Year	1-9 units completions	Total completions	% completions
2013/14	89	167	53.29
2014/15	112	340	32.94
2015/16	151	453	33.33
2016/17	207	427	43.86
2017/18	165	544	30.33
2018/19	170	554	30.69

- 5.28 It can be seen that, over a sustained period, small sites have continued to play a significant part in housing supply; moreover, in the last three years, the average has been even higher than the long-term average. The longer-term average of 132 dwellings on small sites per year (net) is considered to unlikely to be sustained over the whole Plan period, as opportunities within LBDs are finite and many of the more achievable infills, redevelopments and conversions have been undertaken. It is difficult to estimate how the various factors will interact in the future, so a very cautious approach to future windfall rates is proposed, in order to be confident that there will be no pressure for further allocations beyond those to be identified in the Local Plan.
- 5.29 Consideration has also been given to making allowance for larger unidentified (windfall) sites. These have historically also made up a high proportion of total completions. However, on the basis that the Council has undertaken a call for sites and carried out an extensive assessment of these through the SHELAA process, it is inevitable that, going forward, the incidence of windfall sites should reduce substantially. While it is equally inevitable that some further windfall sites of 10+ dwellings will continue to come forward, including through redevelopments, it is very difficult to predict these with real confidence, so no allowance is made in the housing supply calculations. Of course, such sites that receive planning permission would contribute to the five year housing land supply at that time, as well as towards the overall housing requirement the same will be true of all small windfall sites).
- 5.30 Consequently, it is evident that sites of 1-9 units (considered windfall sites as not identified individually within the Local Plan) have historically made a significant contribution to overall supply, constituting between 37.77 and 44.47% of the overall completions, as well as providing an average of 132-144 units per year. This evidence readily justifies the Council's windfall allocation of 50 per year which, although assuming a significant reduction relative to past windfall rates, is considered to be a reliable figure when taking into account increasingly limited/depleted land supply/opportunities for small-scale developments within existing settlements in the borough . Moreover, this windfall allowance is also considered appropriate as a means of ensuring that both small, non-allocated sites coming forward through the planning process throughout the Plan period are taken

into account, as well as that they are not being over-relied on as a means to achieving the borough's housing target. Calculated as a percentage of the housing target of 13,560 minus completions, existing Site Allocations Local Plan allocations, and extant planning applications (figures as shown in Table 1), the windfall allowance of 50 per year accounts for only 8.44% of the overall remaining requirement per year (with the remainder to be met by new site allocations) (footnote 12: this calculation was made as follows: $(100 \text{ divided by } (13,560 \text{ minus } (1,552 + 3,127 + 588))) \text{ multiplied by } 700$).

6.0 The needs identified in the Council's Housing Needs Assessment Topic Paper

Affordable housing provision

- 6.1 Tunbridge Wells borough is recognised as a 'high affordability pressure area'. Moreover, the specific need identified for affordable housing in the Strategic Housing Market Assessment (SHMA), as explained in the Housing Needs Assessment Topic Paper, was notably high (341 per annum; i.e. over 50% of the Council's annual housing target of 678). However, 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 \(2019\)](#)). Therefore, consideration should be given to optimising the supply of affordable homes.
- 6.2 As such, it is acknowledged that, although there is an identified high need for affordable housing in the borough, it would not be viable for the Plan and for its delivery to aim for meeting the 341 figure of affordable housing as a share of the 678 target per annum (50.3%). Despite this, in order to provide for the affordable housing need in the borough as effectively as possible throughout the Plan period, it can be justified that the Council requires further action above the requirements in the NPPF.
- 6.3 Consequently, although the NPPF states that "affordable housing should not be sought for residential developments that are not major developments" (para. 63), it is proposed that on all sites delivering a net increase of 1-9 dwellings, there should be an expectation that a financial contribution towards the provision of off-site affordable housing (land and build costs) will be provided based on 20% of the gross number of residential units to be provided. This percentage has regard to the emerging findings of the Local Plan and CIL Stage 1 Viability Assessment ([view the Stage 1 Viability Assessment](#)). In applying this to the Council's windfall allowance of 700 during the Plan period, it is expected that 140 additional affordable units would be delivered as a result.
- 6.4 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. Applying this crudely to the local housing need set out above,

of 628 dwellings (678 target minus 50 dwelling windfall allocation), would yield 220 affordable homes per annum. 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 proposed that sites on greenfield (undeveloped) land will be required to deliver a minimum of 40% affordable housing, whereas sites on brownfield (previously developed) land will be required to deliver a minimum of 30% affordable housing (to encourage deliverability). Based on an assumption that approximately 80% of all new housing will be on greenfield sites with 20% on brownfield (based on the percentage share of previously developed land and greenfield completions in recent years), the yield of affordable housing from 628 homes/year would be 239 as shown in Table 12. This figure provides 8.6% more affordable units per annum than the 35% wide figure (as of current policy) which would result in an additional 266 affordable housing units over the Plan period from new allocations (14 years).

Table 12: Indicative affordable housing provision per annum

	Total homes per year	Affordable homes
Brownfield	126 (628*20%)	38 (126*30%)
Greenfield	502 (628*80%)	201 (502*40%)
Total	628	239

- 6.5 Moreover, it is expected that there will be a delivery of 50 windfall dwellings per annum (generally on sites of less than 10 units), applying the 20% contribution allows for an additional 10 units per year, consequently yielding **249** per annum and therefore over 13% higher than current policy allows. Although, it should be borne in mind that this calculation is crude and likely to be a maximum, as some sites and developments may not be eligible for this level of affordable housing.
- 6.6 Therefore, due to the high needs for affordable housing in the borough, there is a strong case to take the NPPF requirements a step further in order to maximise the contribution toward meeting affordable housing needs by seeking, or at least testing, a requirement for provision on/contributions from all housing development schemes, i.e. both major development (allocations) and smaller (windfall) sites.
- 6.7 Furthermore, the general approach is that 60% of such affordable housing will be social rent (SHMA estimated 64.3% need; HNS estimated 52.2% preference), with 40% being intermediate tenures (SHMA estimated 35.7% need; HNS estimated 47.8% preference). The midpoint of the SHMA and HNS figures are used, favouring the SHMA figures, as they were based on estimated need rather than preferences. This will be applicable to all sites that are to deliver affordable housing on site.
- 6.8 As discussed in the following sub-sections, it is 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(2) standard is only targeted at affordable units as there is likely more need for accessible and adaptable housing in the affordable housing sector.

Housing for older people

- 6.9 For the purposes of the Local Plan, 'older people' are defined as people over the age of 65 years. However, this is not prescriptive, and people of a different age may also benefit from the provision.
- 6.10 Although housing for older people has traditionally been seen as Use Class C2 only (i.e. residential nursing care, end of life, hospice care, and dementia care home accommodation), the new Local Plan should also consider housing for older people living in Use Class C3 accommodation (i.e. self-contained accommodation (including age restricted), sheltered accommodation, and extra care accommodation, assisted living, close care, and continuing care).
- 6.11 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 (94%). As a proportion of the overall population, throughout the Plan period those over 65 years old are expected to increase from 19.3% to 25.5%. The Local Plan will therefore need to meet this increasing proportion of older person households throughout the Plan period. 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, especially for affordable homes.
- 6.12 It is proposed that housing suitable for meeting the varying needs of older people should be integrated within all major housing schemes, 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, bungalows and sheltered or other age-specific schemes which will allow a greater number of people to stay in their homes due to the increased ease of adaptability. In addition, it should be considered whether large schemes with good access to services may be required to set land aside for residential/nursing care (C2) purposes. Furthermore, independent nursing and residential care homes should also be supported in accessible locations, subject to other policies in the Plan.
- 6.13 The Council consequently considers that the needs for older persons' housing will be sufficiently taken into account by the Local Plan throughout the Plan period with every opportunity to provide such housing to be explored (i.e. through Policy H 9,

which seeks to encourage the delivery of housing for older people through planning applications, through specific site allocations as above, as well as for those sites allocated for C3 dwellings where appropriate (including mixed use schemes)).

Housing for people with disabilities

- 6.14 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 housing units on sites of 20 or more units that will be required to achieve Building Regulation Standard Part M4(3), or equivalent standards, such as 'Habinteg Design' guidance ([view Habinteg: Accessible Homes; Independent Lives](#)) (or any subsequent updates), in order to sufficiently meet the needs of people with disabilities.

Self-build and custom housebuilding

- 6.15 As outlined within the Housing Needs Assessment Topic Paper, there are currently 163 registrations on the Self-Build and Custom Housebuilding Register since the introduction of the Register on 1st April 2016, accumulated over the three existing base periods to 30th October 2018. On the basis that Councils should 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, then the Council needs to provide 163 serviced plots by 30th October 2021.
- 6.16 If this rate of additions, of approximately five registrations per month, to the Register were to continue each year through the Plan period, then it would total some 1,260 entries. However, as discussed in the Housing Needs Assessment Topic Paper, the Council will shortly be considering the introduction of a local connection test for those on the Register. Assuming this to be in place, having calculated the current percentage of those on the Register who are deemed local (i.e. living within the borough), the total number of registrations projected over the full Plan period (1st April 2016 to 31st March 2036) would be 796. Hence, for the purposes of policy development, the rounded target is currently taken to be 800 custom and self-build permitted plots.
- 6.17 The self-build and custom housebuilding need in the borough will be reviewed for the next version of the Local Plan (Regulation 19), taking account of further information from the Register and the outcome of the proposed application of a local needs connection test.

- 6.18 As the Council does not presently have monitoring information on the number of self-build and custom housebuilding permissions in the borough (unlike in CIL-charging local authorities with the ability to monitor permissions through the CIL self-build charging exemption), it is not certain whether the Council has not met the aforementioned need. However, it is noted that a significant number of applications (258) for single dwellings have been approved since 1st April 2016 to 31st March 2019, which mostly take the form of and/or convey similarities to self-build and custom housebuilding proposals.
- 6.19 The Council has contacted nearby local authorities which have a CIL regime for information on self-build and custom housebuilding statistics for individual dwelling proposals since the introduction of monitoring for self-build and custom housebuilding permissions in their respective area. However, there are no definitive statistics, due to the fact that CIL exemptions can be applied for at any point up to the start of development. At this point, the ratio of custom and self-build exemptions to starts is used, as it seems likely that a proposal with a specific occupier will not be delayed.
- 6.20 While information is limited, it appears that the proportion of individual dwelling schemes classed as self-build could be between 30-70%. This is not considered a robust basis for the final Local Plan, so further investigation will be carried out prior to preparation of the Regulation 19 Local Plan. However, for the purposes of policy development for the Regulation 18 Local Plan, the mid-point (50%) seems a reasonable working assumption.
- 6.21 It can therefore be considered that, of the individual dwelling permissions approved in the Tunbridge Wells borough since 1st April 2016 (258), 129 of these could be classed as self-build.
- 6.22 Individual dwellings will, of course, continue to come forward through the remaining Plan period. The number of these that have been completed to date are shown in Table 13 below:

Table 13: Number of single dwellings completed 1st April 2016 to 31st March 2019

	Single dwelling completions
2016/17	30
2017/18	66
2018/19	67

- 6.23 Taking into account the figures above, it is considered that an average of 50 dwellings per year appears reasonable. On the basis of 50% being custom and self-build dwellings, as above, then this could contribute a further 350 dwellings over the Plan period from likely date of adoption (i.e. 50 dwellings x 50% x 14 years).

- 6.24 Additional plots may be secured as part of larger developments. It is recommended that for sites proposing to deliver (or capable of delivering) 100 or more residential units, at least 5% of the total number of units being proposed must be self-build or custom housebuilding plots. Where the 5% figure of a site's total yield does not result in a whole number, this figure will be required to be rounded up to the next whole number. This provision will be in addition to affordable housing requirements in the Local Plan.
- 6.25 Based on the Local Plan trajectory outlined in the previous section of this paper, Table 14 shows the total number of self-build and custom housebuilding plots that this requirement from allocations (of 100+ dwellings) would deliver, by year across the Plan period. In accordance with the phasing methodology, this delivery is expected to begin from 2022/23 based on the assumption of the time taken to achieve planning permission from submission of the Local Plan (i.e. when the Local Plan policies, and hence the self-build and custom housebuilding policy requirements, will carry weight). In total, there are 9 allocations in the Local Plan that are to be phased from 2022/23 (at the earliest) which are of at least 100 dwellings in size and which would therefore be required to provide self-build plots. The total supply would be 362 custom and self-build plots.

Table 14: Expected delivery of self-build and custom housebuilding dwellings from allocated sites

Plan year	Number of self-build completions from allocations
2022/23	0
2023/24	0
2024/25	20
2025/26	38
2026/27	40
2027/28	35
2028/29	34
2029/30	30
2030/31	27
2031/32	30
2032/33	28
2033/34	26
2034/35	27
2035/36	27
Total	362

- 6.26 If this approach to the provision of custom and self-build housing were applied, then the total supply over the Plan period, as shown in Table 15, would be:

Table 15: Total estimated supply of self-build and custom housebuilding dwellings

	Number of self-build and custom housebuilding dwellings
Permissions 1st April 2016 to 31st March 2019	129
Anticipated completions from individual dwellings 1st April 2021 to 31st March 2036	350
Provision on large allocated sites (100+ dwellings)	362
Total estimated supply of self-build and custom housebuilding dwellings	841

- 6.27 In summary, it can be seen that the likely need for some 800 self-build and custom housebuilding plots over the course of the Plan period will be met and somewhat exceeded by the proposed approach.
- 6.28 As indicated above, these estimates are provisional. The level of need will be kept under review subject to the progress/outcome of the production of a local connection test and local investigations into the supply of custom and self-build plots.

Gypsies, travellers and travelling showpeople

- 6.29 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).
- 6.30 The PPTS sets, at paragraph 10, 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.*"
- 6.31 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, it is considered that the Local Plan should make provision for 32 pitches over 20 years, 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.
- 6.32 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 allocations**

Site Criteria

- 6.33 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 also 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.
- 6.34 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.
- 6.35 It is proposed to include a policy in the Local Plan that reflects the above considerations (see Proposed Policy and Site Allocations below).

Sources of supply

- 6.36 The provision of 32 additional pitches over the Plan period (2016-2036) is seen in the context of the existing provision of some 55 pitches, of which 46 are private (GTAA figures for July 2018). It is also notable that the majority of pitches are on small, family sites, as illustrated below in Table 16:

Number of pitches per site	Number of sites
1	12
2	6
3	3
4	1
5	0
6	0

Number of pitches per site	Number of sites
7	1

- 6.37 It can be seen that nearly 80% of sites have only one or two pitches, with only one site having more than four pitches.
- 6.38 It follows that, as the need over the Plan period is essentially expected to come from existing local families, then first consideration should be given to the potential for additional pitches at established sites.
- 6.39 A review of pitch completions and planning permissions since the base date of the Local Plan shows that there has been one completion, at Funnel Piece, and there are two pitches with outstanding planning permission, on separate sites, at Cinderhill and at Mile Oak Stables. There is also one pitch, at The Haven, which can now be regarded as an ‘established use’. This brings the outstanding need, as at April 2019, for additional provision down by four, to 28 pitches.
- 6.40 The GTAA consultants advised, based on their understanding of existing sites and the nature of demand, that the most appropriate way of meeting the identified need families, should largely be through the intensification and/or expansion of existing sites. Further consideration of this potential largely confirms the conclusions of the GTAA, with a potential for some 24-28 pitches at existing sites. In most cases this is through intensification within an existing site, most of which is essentially ‘brownfield’ land, although it also includes some small-scale extensions to existing sites on land within the same ownership.
- 6.41 Hence, it is evident that there is the potential at existing sites to meet most if not all of the likely need over the Plan period. It is stressed that this cannot be regarded as identifying a particular capacity at any one location, as it is dependent upon detailed assessment of individual proposals. However, it provides a level of confidence to at least take the bottom of the range as a realistic estimate of the yield from existing sites. This leaves a small residual requirement for new site allocations for four pitches.

Proposed policy and allocations

- 6.42 From the above, it follows that the focus of the Local Plan approach to additional traveller pitches should be through providing scope for existing sites to accommodate additional pitches.
- 6.43 It is considered that, given the relatively small number of additional pitches to be provided for, mostly with the odd 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 (lawful) sites being the focus of further provision.

- 6.44 In order to provide more confidence of meeting the full identified need, it is proposed to make specific site allocations for four pitches.
- 6.45 There is one site, Oak Tree Farm in Cranbrook and Sissinghurst parish, which currently has one pitch. Although this site is identified as suitable for residential development, an additional pitch is to also be reserved on-site. Therefore, the residential allocation is to include provision for two pitches (a net gain of one pitch) as part of the allocation.
- 6.46 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 includes such a policy reference.

Small and medium sized sites

- 6.47 As aforementioned, 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.
- 6.48 Consequently, the Council has assessed its proposed allocations, extant planning permissions, as well as 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 17 below.

Table 16: Allocation of small and medium sized sites in the Local Plan

	Number of units	Small and medium sites (one hectare or less) percentage share towards overall housing target
Overall housing target (Standard Methodology over Plan period from 2016-2036)	13,560	
13,560 minus completions (built 1st April 2016 to 31st March 2019)	12,008 (13,560-1,552)	
10% minimum small and medium sized site requirement of 12,008	1,201 (12,008/10)	

	Number of units	Small and medium sites (one hectare or less) percentage share towards overall housing target
Windfall allowance over Plan period	700	
Number of units on proposed site allocations one hectare or less (23 sites in total)	591	
Number of extant units on sites with planning permission under one hectare (422 sites in total)	1,370	
Total number of units to be provided on site of one hectare or less	2,661	22.1%
Total number of units to be provided on site of one hectare of less excluding windfalls	1,961	16.3%

6.49 Table 17 shows that small and medium sized sites to be delivered during the Plan period will make a contribution of 22.1% towards the Council's overall required housing target (minus completions), therefore providing significantly over the minimum requirement of 10%. Furthermore, subtracting windfalls from this calculation, the Council will still deliver 16.3% of its overall housing target (minus completions) on small and medium sized sites which indicates that there is not an over-reliance on the Council's windfall allocation to meet this national 10% requirement.

7.0 Conclusion

- 7.1 This paper has outlined how the Council aims to meet the housing requirement of 13,560 dwellings from 2016-2036 in the new Local Plan. Moreover, the proposed site allocations in the new Local Plan, in addition to completions, extant planning permissions, SALP allocations, and the 50 dwellings per annum windfall allowance from 2022/23, will provide an additional allowance of 9% on top of this requirement (totalling an approximate delivery of 14,776 dwellings to 2036). This 9% buffer is considered helpful to allow for the potential delay/non-delivery of sites (both extant planning permissions and site allocations). Table 18 represents the distribution of housing delivery as a share of the 14,776 figure.

Table 17: Local Plan distribution of housing delivery

1	Housing need using the Standard Method (2014 household projections)	13,560	
2	Completions April 2016 to March 2019	1,552	
3	Extant planning permissions at 1st April 2019	3,127	
4	Outstanding site allocations	588	
5	Windfall allowance	700	50 per year for 14 years (2022-2036)
6	New site allocations	8,809	
7	Total Local Plan expected housing delivery	14,776	<i>[9% buffer over local housing need]</i>

- 7.2 This paper has also outlined the housing delivery and phasing 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 (SALP and new) proposed in the new Local Plan. Each new site allocation has been phased in accordance with this methodology as well as based on the responses received from site promoters as part of initial communications on expected planning application submission dates. Sites within the same settlement have also been phased to ensure that delivery on all sites isn't occurring at the same time as would unlikely be the case.
- 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. 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 from 2006

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
Average	4	43.67	77.44

	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
2011-12	1.45	13.11	31

	Average completions (build-out rate)		
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
Average	1.44	14.04	61.22

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