

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Note Requested by the Inspector

**Local Plan Examination Note for
Inspector in response to Action Point 30
regarding the Local Plan and Five-Year
Housing Land Supply Positions**

Document Reference: TWLP/153

Date: June 2024



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1.0 Discussion

- 1.1 Within the Council's Matter 8, Issue 1 Hearing Statement [[TWLP/131](#)], the Council proposed a revised local housing need figure of 667 dwellings per annum (capped) based on the Standard Method calculation as at 1 April 2023. This was a reduction from the previously identified position in the Submission Local Plan of 678 dwellings per annum. However, as discussed during the 20 June 2024 Examination Hearing session, it was acknowledged that new house price to workplace-based earnings ratio (i.e., the affordability ratio) data was published by the Office for National Statistics on 25 March 2024 which included a new affordability ratio figure for 2023 (see link). This 2023 affordability ratio is 12.57.
- 1.2 Under the Standard Method, the affordability ratio calculation (step 2) equates to 1.535625. In applying this affordability ratio calculation to the Standard Method calculation (based on projected 2023-2033 household growth), the resulting uncapped figure is 732 dwellings per annum. However, this uncapped figure represents a 53.56% increase over the projected household growth. Therefore, regardless of the new affordability ratio calculation, the 40% cap applied in accordance with the relevant Planning Practice Guidance on calculating the Standard Method local housing need figure still results in 667 dwellings per annum as at 1 April 2023. As such, the new affordability ratio figure has had no effect on the capped figure (only the uncapped figure).
- 1.3 Furthermore, as also discussed during the Local Plan Examination Hearing on Matter 8, it is noted that the latest base date for projecting household growth is now 1 April 2024. Therefore, in using projected household growth between 2024-2034, the uncapped figure is 724, and the capped figure is 660. As discussed during the Hearing, it was agreed that the Council would use the 660 figure within a revised trajectory (which is the latest objectively assessed housing need figure available).
- 1.4 The reduced annual housing target over the Plan period results in a reduced need of 126 dwellings over the Plan period and a reduction of 105 dwellings from the base date of the Plan period to the end of the 10-year supply period (1 April 2020 – 31 March 2035). In addition to a further small revision to the phasing of STR/SS1 following discussions with the site promoters, the revised buffer at the end of the 10-year supply

period is 200 dwellings which equates to an overall buffer of 2.02% (anticipated supply of 10,100 dwellings against a need of 9,900 dwellings from 1 April 2020 to 31 March 2035).

1.5 In addition, the anticipated five-year supply position post-adoption (currently anticipated to be 1 April 2025) is 5.42 years with a 5% buffer applied. The anticipated supply of 3,689 dwellings within the first five-years post-adoption against the anticipated housing target of 3,402 (with the 5% buffer applied) in fact results in a buffer of 287 dwellings above the anticipated five-year housing land supply target at adoption (and therefore can comfortably accommodate the 5% buffer). The buffer against both scenarios where a 5% buffer has, and has not, been applied to the housing target is set out further in **Table 1** below. Thereafter, with a 5% buffer applied, the Council can demonstrate a rolling five-year housing land supply to 1 April 2030 (which would cover to the end of the 10-year supply period to 31 March 2035).

Table 1 – Buffer Against Anticipated 5YHLS Target at Adoption

	Anticipated 5YHLS Target (Dwellings)	Buffer of Anticipated Supply (3,689 Dwellings) Above Target (%)	Buffer of Anticipated Supply (3,689 Dwellings) Above Target (Dwellings)
Anticipated 5YHLS Target at 1 April 2025 (no buffer applied)	3,240	13.86%	449
Anticipated 5YHLS Target at 1 April 2025 (5% buffer applied)	3,402	8.44%	287

1.6 During the 20 June 2024 Examination Hearing, the Council was given the suggestion to consider proposing a stepped housing requirement. The relevant Planning Practice Guidance states that “a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.” As per the Council’s proposed housing trajectory, the Council is confident that both the anticipated housing targets from the base date of the Local Plan will be met by the end of the 10-year supply period post-adoption, and the Council, in discussion with site promoters for the strategic site at

STR/SS1, is confident of the indicative phasing and build-out rates of the strategic site allocation. As such, and as noted above, the Council is confident that a five-year housing land supply with a 5% buffer applied will be demonstrated as at adoption, and accordingly the Council does not consider that a stepped approach would be required.

- 1.7 The above has been reflected within a revised trajectory which can be found in **Appendix 1**. Moreover, as requested during the 20 June 2024 Examination Hearing, the trajectory has been amended to identify the anticipated phasing within each parcel of STR/SS1. In addition, some further amendments to paragraphs and Table 3 within the Submission Local Plan are proposed within **Appendix 2** to reflect the above.

Appendices

Appendix 1: Updated Local Plan Housing Trajectory (Position as at 1 April 2023) – June 2024 Update

Plan Year		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18					
Actual Year		2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38					
Projected Housing Completions		688	518	636	842	736	713	923	703	789	561	843	610	557	534	447	372	270	241					
Cumulative Projected Housing Completions		688	1206	1842	2684	3420	4133	5056	5759	6548	7109	7952	8562	9119	9653	10100	10472	10742	10983					
Housing Target		660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660					
Cumulative Housing Target		660	1320	1980	2640	3300	3960	4620	5280	5940	6600	7260	7920	8580	9240	9900	10560	11220	11880					
Ref	Site Address	Parish	Lower	Mid	Upper																			Totals
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	Royal Tunbridge Wells	150	175	200	0	0	0	0	0	0	0	0	0	0	40	40	40	40	15	0	0	0	175
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	Royal Tunbridge Wells	100	130	160	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 1 (C2 Discount)	Former Cinema Site, Mount Pleasant Road	Royal Tunbridge Wells	-18	-39	-60	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 2	Land at the Auction House, Linden Park Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	0	100
AL/RTW 4	Land at 36-46 St John's Road	Royal Tunbridge Wells	65	78	90	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	100
AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	Royal Tunbridge Wells	40	43	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 7	Land at former Gas Works, Sandhurst Road	Royal Tunbridge Wells	170	185	200	0	0	0	0	0	0	70	70	45	0	0	0	0	0	0	0	0	0	185
AL/RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 9	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	69	69	69	0	0	0	0	0	0	0	0	0	69	0	0	0	0	0	0	0	0	69
AL/RTW 9 (C2 discount)	Land at Beechwood Sacred Heart School	Royal Tunbridge Wells	-33	-33	-33	0	0	0	0	0	0	0	0	0	-33	0	0	0	0	0	0	0	0	-33
AL/RTW 10	Montacute Gardens	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	21
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	Royal Tunbridge Wells	45	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	Royal Tunbridge Wells	50	50	50	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0	0	0	50
AL/RTW 13	Turners Pie Factory, Broadwater Lane	Royal Tunbridge Wells	100	100	100	0	0	0	0	0	0	70	24	0	0	0	0	0	0	0	0	0	0	94
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	Royal Tunbridge Wells	25	28	30	0	0	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	28

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
Projected Housing Completions	688	518	636	842	736	713	923	703	789	561	843	610	557	534	447	372	270	241
Cumulative Projected Housing Completions	688	1206	1842	2684	3420	4133	5056	5759	6548	7109	7952	8562	9119	9653	10100	10472	10742	10983
Housing Target	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660
Cumulative Housing Target	660	1320	1980	2640	3300	3960	4620	5280	5940	6600	7260	7920	8580	9240	9900	10560	11220	11880

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals					
AL/RTW 15	Land at Showfields Road and Rowan Tree Road	Royal Tunbridge Wells	35	38	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	Royal Tunbridge Wells	120	120	120	0	0	0	0	0	0	0	0	60	60	0	0	0	0	0	0	0	0	0	120				
AL/RTW 17	Land adjacent to Longfield Road	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	Royal Tunbridge Wells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/RTW 20	Land at Culverden Stadium, Culverden Down	Royal Tunbridge Wells	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30				
AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	Royal Tunbridge Wells	80	80	80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	36	80				
AL/RTW 22	Land at Bayham Sports Field West	Royal Tunbridge Wells	20	23	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	23				
AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	Southborough	16	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/SO 2	Land at Mabledon House	Southborough	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/SO 3	Land at Baldwins Lane	Southborough	26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
STR/SS 1	The Strategy for Paddock Wood and east Capel (See Parcels Below)	Paddock Wood	2,374	2,453	2,532	0	0	0	0	0	10	80	190	260	260	287	287	280	280	280	220	74	0	2508					
STR/SS 1	East Parcel (Redrow)					0	0	0	0	0	0	0	0	40	60	60	60	60	60	60	60	60	60	60	60	60	20	0	600
STR/SS 1	East Parcel (Persimmon)					0	0	0	0	0	0	0	0	10	40	60	60	60	60	60	60	60	60	30	0	0	560		
STR/SS 1	East Parcel (Remaining Land)					0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	34	0	64		
STR/SS 1	West Parcel (Crest)					0	0	0	0	0	0	0	0	0	0	30	80	80	100	100	100	100	100	100	60	20	0	770	
STR/SS 1	West Parcel (Dandara)					0	0	0	0	0	0	0	0	0	0	40	60	60	67	67	60	60	60	40	0	0	514		
STR/SS 2	The Strategy for Paddock Wood Town Centre	Paddock Wood	30	30	30	0	0	0	0	0	0	0	0	0	0	5	5	5	1	0	0	0	0	0	16				
AL/PW 1	Land at Mascalls Farm	Paddock Wood	413	413	413	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/CRS 1	Land at Brick Kiln Farm, Cranbrook	Cranbrook and Sissinghurst	180	180	180	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	Cranbrook and Sissinghurst	35	40	45	0	0	0	0	0	0	0	0	0	0	0	0	0	40	0	0	0	0	0	40				
AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	Cranbrook and Sissinghurst	200	202	204	0	0	0	0	0	0	70	70	26	0	0	0	0	0	0	0	0	0	0	166				
AL/CRS 4	Cranbrook School	Cranbrook and Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
AL/CRS 5	Sissinghurst Castle Garden	Cranbrook and Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				

Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
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Housing Target	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660
Cumulative Housing Target	660	1320	1980	2640	3300	3960	4620	5280	5940	6600	7260	7920	8580	9240	9900	10560	11220	11880

Ref	Site Address	Parish	Lower	Mid	Upper	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Totals
AL/CRS 6	Land south of The Street, Sissinghurst	Cranbrook and Sissinghurst	20	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 7	Land at corner of Frittenden Road and Common Road, Sissinghurst	Cranbrook and Sissinghurst	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 1	Land at the White House, Highgate Hill	Hawkhurst	42	42	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 2	Brook House, Cranbrook Road	Hawkhurst	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 3	Former Site of Springfield Nurseries	Hawkhurst	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 4	Land off Cophthall Avenue and Highgate Hill	Hawkhurst	70	75	79	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 5	Land to the north of Birchfield Grove	Hawkhurst	70	70	70	0	0	0	0	0	35	35	0	0	0	0	0	0	0	0	0	0	0	70
AL/HA 6	Sports Pavilion, King George V Playing Fields, The Moor	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 7	Hawkhurst Station Business Park	Hawkhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SSP2	Land adjacent to New Pond Road (known as Uphill), Benenden	Benenden	18	19	20	0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0	19
SSP1	Feoffee Cottages and land, Walkhurst Road, Benenden	Benenden	23	24	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SSP3	Land at Benenden Hospital (south of Goddards Green Road), East End	Benenden	25	25	25	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	25
SSP4	Land at Benenden Hospital (north of Goddards Green Road), East End	Benenden	22	24	25	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	0	0	0	24
AL/BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	Brenchley and Matfield	45	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/BM 2	Land at Maidstone Road	Brenchley and Matfield	11	13	15	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15
AL/FR 1	Land at Cranbrook Road, Frittenden	Frittenden	25	28	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	Goudhurst	14	14	14	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	14
AL/GO 2	Land at Triggs Farm, Cranbrook Road	Goudhurst	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	Horsmonden	45	50	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	Horsmonden	70	70	70	0	0	0	0	0	44	24	0	0	0	0	0	0	0	0	0	0	0	68
AL/HO 3	Land to the east of Horsmonden	Horsmonden	115	140	165	0	0	0	0	0	50	70	0	0	0	0	0	0	0	0	0	0	0	120
AL/LA 1	Land to the west of Spray Hill	Lamberhurst	25	28	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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Actual Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
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Ref	Site Address	Parish	Lower	Mid	Upper																		Totals		
AL/PE 1	Land rear of High Street and west of Chalk Lane	Pembury	50	55	60	0	0	0	0	0	0	0	0	0	0	44	11	0	0	0	0	0	0	55	
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	Pembury	80	80	80	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	0	0	80	
AL/PE 3	Land north of the A21, south and west of Hastings Road	Pembury	80	80	80	0	0	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	80	
AL/PE 4	Land at Downingbury Farm, Maidstone Road	Pembury	25	25	25	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	25	
AL/PE 5	Land at Sturgeons fronting Henwood Green Road	Pembury	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 6	Woodsgate Corner	Pembury	80	100	120	0	0	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	100	
AL/PE 6 (C2 Discount)	Woodsgate Corner	Pembury	-18	-29	-40	0	0	0	0	0	0	0	0	0	0	0	0	-20	-9	0	0	0	0	-29	
AL/PE 7	Cornford Court, Cornford Lane	Pembury	69	69	69	0	0	0	0	0	-5	0	0	0	0	0	0	0	0	0	0	0	0	-5	
AL/PE 7 (C2 Discount)	Cornford Court, Cornford Lane	Pembury	-33	-33	-33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8	Owlsnest Wood, Tonbridge Road	Pembury	75	75	75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8 (C2 Discount)	Owlsnest Wood, Tonbridge Road	Pembury	-37	-37	-37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RU 1	Lifestyle Motor Europe, Langton Road	Rusthall	15	15	15	0	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	15	
AL/SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst	Sandhurst	10	13	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/SA 2	Sharps Hill Farm, Queen Street	Sandhurst	10	13	15	0	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	13	
AL/SP 1	Land to the west of Langton Road and south of Ferbies	Speldhurst	10	11	12	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	11	
AL/SP 2	Land at and adjacent to Rusthall Recreation Ground, Southwood Road	Speldhurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total from Allocations									0	0	5	378	551	545	409	617	458	405	382	295	220	118	89	4472	
Windfall Allowance									0	0	0	152	152	152	152	152	152	152	152	152	152	152	152	152	1824
Total from Extant Planning Permissions (1 April 2023)									842	736	708	393	0	92	0	74	0	0	0	0	0	0	0	0	2845

Appendix 2: Proposed SLP Modifications (Bold and Underlined)

Paragraph 2.8:

A key challenge is meeting the housing needs of the borough. These are assessed, in line with national policy, as amounting to ~~678~~ **660** per annum, equivalent to some ~~12,200~~ **11,880** additional homes over the plan period to 2038.

Paragraph 4.10:

The standard method housing need figure for the borough is ~~678~~ **660** dwellings per year; over the full plan period, 2020-2038, this equates to a need of some ~~12,200~~ **11,880** dwellings. It is noted that national policy clarifies that this would be a minimum target.

Table 3 – Housing Need and Supply 2020-2038:

1.	Housing need 2020-2038	12,200 <u>11,880</u>	18 years x 678 <u>660</u> pa
1a	<u>Completions 2020-2023</u>	<u>1,842</u>	<u>See 5YHLS 2023</u>
2.	Extant planning permissions at 1 April 2020 <u>2023</u>	3,313 * <u>2,845</u>	See HS&T TP <u>See 5YHLS 2023</u>
3.	Windfall allowance small sites <u>at 1 April 2023 (to 2038)</u>	1,310 <u>1,464</u>	See HS&T TP/BL TP
4.	Windfall allowance large urban sites <u>at 1 April 2023 (to 2038)</u>	360	See HS&T TP/BL TP
5.	Outstanding SALP/Local Plan site allocations	276 <u>592</u>	See HS TP <u>See 5YHLS 2023</u>
6.	<u>Outstanding Benenden Neighbourhood Development Plan Site Allocations</u>	<u>68</u>	<u>See BNDP</u>
6. 7.	Minimum additional allocations to meet need <u>(based on 660dpa to 2038)</u>	6,949 <u>4,709</u>	= row 1 - rows (2-5 <u>1a-6</u>)
7. 8.	Minimum total allocations <u>(based on 660dpa to 2038)</u>	7,221 <u>5,369</u>	Rows 5+6+ <u>7</u>

**Includes discounting for C2 permissions*

Paragraph 4.16:

Further details of both already identified sites and windfall sites are set out in the Housing Supply and Trajectory Topic Paper (HS&T) and the Brownfield Land Topic Paper (BL TP). Based on this evidence, Table 3 below identifies the respective contributions to housing supply from these different sources and, hence, the minimum scale of additional allocations if

the housing need is to be met. The figures are based on the **latest data available as at 1 April 2023**. ~~monitoring of housing completions up to 31 March 2020.~~

Paragraph 4.17:

Hence, it would be necessary for further site allocations to be made for some ~~6,900~~ **4,709** additional homes, assuming that all previous allocations are still suitable and developable. Given that earlier Local Plans would be superseded by this Local Plan, requiring sites to be reassessed for allocation, the total delivery required from allocations in the Local Plan (**in addition to adopted allocations in the Benenden NDP**) to meet the borough's housing needs would be at least ~~7,721~~ **5,369** dwellings.

Table 4 – Distribution of Housing Allocations:

Parish/Settlement	Local Plan allocations	
	Lower	Upper
Royal Tunbridge Wells	1,416 1,278	1,536 1,421
Southborough	42	42
Paddock Wood	3,932 2,817	4,032 2,975
<i>Strategic urban expansion*</i>	3,490 2,374	3,590 2,532
<i>Town centre</i>	30	30
Capel	2,100	2,100
Tudeley Village – new settlement	2,100	2,100
Cranbrook and Sissinghurst	453	467
<i>Cranbrook</i>	415	429
<i>Sissinghurst</i>	38	38
Hawkhurst	164 231	170 240
Benenden*	87 88	95
<i>Benenden*</i>	43 41	45
<i>East End*</i>	44 47	50
Bidborough	0	0
Brenchley and Matfield	56	60
Frittenden	25	30
Goudhurst	25	25
Horsmonden	240 230	320 290
Lamberhurst	25	30
Pembury	389 390	417 418
Rusthall	15	15
Sandhurst	20	30
Speldhurst	10	12
Sub-total	8,996 5,705	9,381 6,150
Allocations with existing planning permission as at 1 April 2023 (to be discounted to avoid double counting)	920 1,614	920 1,614
Total (with existing planning permission discounted)	8,076 4,091	8,461 4,536

Paragraph 4.53:

It can be seen that the total capacity of all allocated sites, excluding those that already have planning permission at the base date, is ~~8,076-8,461~~ **4,091 – 4,536** dwellings. This compares to the anticipated residual requirement, after sites with planning permission and windfall sites allowances are made, of ~~7,224~~ **5,369** dwellings. In overall terms, the allocated sites, together with these other sources of supply yield ~~13,059-13,444~~ **10,602-11047** dwellings, relative to the Plan's overall target of ~~12,204~~ **11,880** net additional dwellings.

Paragraph 4.54:

Taking the mid-point of dwelling ranges, there is a 'buffer' **shortfall** of approximately 1,000 dwellings, equivalent to some ~~14.6%~~ **19.7%** of the need from allocated sites and ~~8.6%~~ **8.9%** of overall need **to the end of the plan period**. ~~While there is a high level of confidence regarding the achievability and availability of identified sites, and very high for those that have already the benefit of planning permission, and the windfall allowances are robust,~~ **such that the Council is confident that a 10-year housing land supply can be achieved post-adoption. The Council will then aim to meet the needs beyond the 10-year supply period by way of an immediate Local Plan review.** ~~it is accepted that it is prudent to provide this degree of flexibility in the actual housing supply, particularly having regard to the high contributions from the strategic sites.~~