

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council  
Hearing Statement**

**Matter 8: Meeting Housing  
Needs (Policies H1, H2, H3,  
H4, H5, H6, H7, H8, H9, H10,  
H11 and H12)  
Issue 8: Self-Build and Custom  
Housebuilding**

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# Matter 8 – Meeting Housing Needs (Policies H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and H12)

## Issue 8 – Self-Build and Custom Housebuilding

Inspector’s Question 1: [re. need and supply for such schemes]

*What is the need for self-build and custom housebuilding schemes and how will this be met over the plan period?*

### TWBC response to Question 1

#### Self-Build and Custom Housebuilding Need

1. The need for self-build and custom housebuilding (SBCH) within Tunbridge Wells borough over the plan period (2020-2038) is clearly outlined within the Housing Needs Assessment Topic Paper [\[CD 3.73\]](#). This identifies that there is an indicative projected need for approximately 518 SBCH dwellings over the plan period. Table 13 of the Topic Paper, which sets out how this need figure has been calculated, is reproduced below.

**Table 1 – Reproduction of Table 13 (With Header Row) of Housing Needs Assessment Topic Paper (Calculation of Self-Build and Custom Housebuilding Need Over the Plan Period (2020-2038))**

Row	Calculation	Figure
1	Total number of months since Register has been active (April 2016-October 2020)	55
2	Number of applicants on Part 1 of the Register (as of 30 October 2020)	108
3	Average number of registrations per month to-date (row 2 divided by row 1)	1.96
4	Total number of months remaining within plan period (November 2020-March 2038)	209
5	Projected number of additional registrations within plan period (row 4 multiplied by row 3)	410
6	Self/custom build need (row 2 (current) + row 5 (projected))	518

2. As can be seen in Table 1 above, and explained within the Topic Paper, the Council has sought to project the SBCH need of those on Part 1 of the Council's SBCH Register (as of 30 October 2020) to the end of the plan period, based on the average number of registrations per month since the base date of the Register (April 2016). This approach is considered robust, as it will ensure that a sufficient supply of SBCH plots is provided to take into account the potential for additions to the Register over the plan period.

### **Self-Build and Custom Housebuilding Supply**

3. The way in which the Council considers the need for SBCH will be met (i.e. the supply) within Tunbridge Wells borough over the plan period (2020-2038) is clearly outlined within the Housing Supply and Trajectory Topic Paper [\[3.74a-b\]](#). This Topic Paper (see paragraphs 6.30 to 6.33 and Tables 11 and 12) identifies that approximately 401 SBCH dwellings (the majority of the need) could be provided on small, single-dwelling windfall sites, alongside a five percent provision on three specific major site allocations equating to approximately 116 SBCH dwellings; in total, this would provide for some 517 dwellings. These site allocations are STR/SS 3 (Tudeley Village) where 105 SBCH plots will be provided within the plan period (i.e., 5% of 2,100), AL/RTW 5 (Caenwood Farm) where five SBCH plots will be provided, and AL/RTW 16 (Spratsbrook Farm) where six SBCH plots will be provided.
4. It is noted that the estimation of 401 SBCH dwellings being provided on small, single-dwelling windfall sites is based on two estimations: (a) that approximately 50% of units delivered on small windfall sites will be on single-dwelling schemes and (b) that approximately 50% of units delivered on single-dwelling schemes will be SBCH.
5. The estimation that 50% of small windfall sites will be on single-dwelling schemes has been informed by local historic data on the gross annual number of single dwelling schemes, and the assumption that approximately 50% of units delivered on single-dwelling schemes are SBCH has been informed by a survey carried out by the Council between 27 May and 22 June 2020 (as outlined within paragraph 6.27 of the Topic Paper), whereby agents and applicants of all single-dwelling completions between 1 April 2016 and 31 March 2019 were contacted as a means of determining the proportion of these considered to be SBCH schemes. The results indicated that approximately 50% of single-dwelling completions are SBCH schemes. This corresponds with broad findings obtained from nearby local authorities that have CIL in place, which indicated

that the proportion of individual dwelling schemes classed as SBCH could be between 30-70%. Table 11 of the Topic Paper has been reproduced below in Table 2, which provides further details on how this indicative small site windfall supply has been calculated (which also has regard to indicative completions between 2020 and 2023 to account for extant permissions).

**Table 2 – Reproduction of Table 11 of Housing Supply and Trajectory Topic Paper (Expected delivery of self-build and custom housebuilding dwellings from single dwelling windfall schemes (2020-2038))**

	<b>Calculation of expected delivery of self-build and custom housebuilding</b>	<b>Number of dwellings</b>
1	Pre-Submission Local Plan small-sites windfall allowance (2023/24 – 2029/30) total (98x7 years)	686
2	Pre-Submission Local Plan small-sites windfall allowance (2030/31 – 2037/38) total (78x8 years)	624
3	Percentage of small-sites windfalls delivered through single dwelling schemes	50%
4	Percentage of single dwelling schemes that are self-build and custom housebuilding	50%
5	Percentage of small-sites windfalls that are self-build and custom housebuilding (50% (row 4) of 50% (row 3))	25%
6	Indicative self-build and custom housebuilding contribution from small-sites windfalls (2023-2038) (25% of row 1 + row 2)	327.5
7	Indicative number of windfalls delivered through permissions based on small-sites windfall allowance (2020/21 – 2022/23) (98x3)	294
8	Indicative self-build and custom housebuilding contribution from permissions based on small-sites windfalls allowance (2020/21 – 2022/23) (25% of row 7)	73.5
9	Total self-build and custom housebuilding contribution from small-sites windfalls (2020-2038) (row 6 + row 8)	401

## Conclusion

6. In total, it is estimated that approximately 517 SBCH dwellings will be delivered through windfall schemes and specific site allocations over the plan period, which may be further supplemented in practice by further windfall plots on sites of more than one dwelling. Consequently, this supply of approximately 517 dwellings would effectively meet the anticipated need of some 518 dwellings over the plan period.

## Inspector's Question 2: [re. 5% allocation requirement]

***What is the justification for requiring 5% of the total number of dwellings to be custom and self-build plots on the allocations listed in Policy H8? Why these sites and not others?***

### TWBC response to Question 2

#### Introduction

7. In addition to an estimated large contribution of supply of SBCH plots from single-dwelling windfall schemes over the plan period as detailed within the response to Question 1, the Council proposes a requirement that approximately five percent (rounded up to the nearest whole number) of dwellings (as serviced plots) of the total net number of dwellings are to be provided for SBCH at the following site allocations:
- Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road (Policy AL/RTW5; allocated for approximately 100 dwellings);
  - Land to the west of Eridge Road at Spratsbrook Farm (Policy AL/RTW16; allocated for approximately 120 dwellings);
  - The Strategy for Tudeley Village (STR/SS3; allocated for approximately 2,100 dwellings within the plan period).
8. It is also noted that the [Planning Practice Guidance](#) (Paragraph: 025 Reference ID: 57-025-20210508) states that, in addressing identified SBCH requirements, local authorities can, for example, aim to meet need via “*a number of units required as part of certain allocated sites, or on certain types of site*”.

#### Justification

9. As outlined within the response to Question 1, the identified need for SBCH dwellings over the plan period is 518. While single-dwelling windfalls may make a large contribution to meeting this need (401/518), and as explained within the Housing Supply and Trajectory Topic Paper [[CD 3.74a-b](#)], it is considered appropriate to identify further capacity for some 115-120 dwellings.

10. The Topic Paper goes on to state that it is considered most appropriate that provision be sought on larger site allocations in Royal Tunbridge Wells, as this is where analysis shows there is most demand for SBCH dwellings compared to other parishes in the borough (being 37% of the total for the borough). The full breakdown of first location preferences of those on Part 1 of the Register can be found in **Table 3** below. It was consequently considered that Caenwood Farm and Spratsbrook would be the most appropriate site allocations within Royal Tunbridge Wells that could contribute towards meeting the identified SBCH need. It is also noted that these two sites are the only large greenfield site allocations within Royal Tunbridge Wells that are not centrally-located and which would be more constrained in terms of capacity for individual SBCH plots, with consequent implications for the deliverability and viability of the site.

**Table 3 - Locational First Preference of Those on Part 1 of the Council's Self-Build and Custom Housebuilding Register (October 2020)**

<b>Settlement</b>	<b>First Preference Demand as a Percentage of Total (Part 1 as at October 2020)</b>
Royal Tunbridge Wells	37%
Southborough	1%
Cranbrook & Sissinghurst	3%
Goudhurst	7%
Benenden	2%
Speldhurst	3%
Brenchley & Matfield	10%
Bidborough	4%
Lamberhurst	5%
Pembury	4%
Hawkhurst	4%
Paddock Wood	1%
Rusthall	2%
Horsmonden	3%
Frittenden	0%
Capel	2%
Sandhurst	1%
Undecided or not stated	12%

11. In addition, the Topic Paper explains that Tudeley Village is considered to be an appropriate development with approximately 5% SBCH dwellings. This is because it will be a unique opportunity where SBCH homes can flourish without the constraints of existing adjacent development, whilst still within a comprehensive development/design framework. It will also help diversify the village's character and may support delivery.

## Conclusion

12. These three allocations would therefore yield approximately 116 SBCH plots, which together with the anticipated supply from single-dwelling sites, would effectively meet the anticipated need of some 518 dwellings over the plan period. These sites would effectively meet the high demand for SBCH plots in Royal Tunbridge Wells and could also contribute to the character and delivery of Tudeley Village. Consequently, the Council considers that the requirement on these three site allocations is appropriate and justified, particularly given that they can make a significant contribution toward ensuring that the SBCH need is adequately met.



## Inspector's Question 3: [re. plots offered to the Council]

*Where plots have been marketed and are unsold, what is the reason for requiring plots to be then offered to the Council? Is this justified?*

### TWBC response to Question 3

#### Consideration

13. The Council notes that Policy H8 states that “if a plot/s has been marketed for six months, and a buyer has not been found, it is advisory that the plots are then offered to the Council to increase the chance of plots being developed. If a buyer is not found then the owner of the plot can build for sale on the open market” (emphasis added).
14. As such, the Council does not require plots to be offered to the Council, but rather advises developers/applicants to offer plots to the Council if they wish, prior to building for sale on the open market.
15. The main purpose for advising developers/applicants to offer plots to the Council after the six-month marketing period has ended is so the Council may, if it wishes, purchase these plots to meet local housing needs. This would further increase the opportunity for SBCH needs in the borough to be met. The Council acknowledges, however, that a requirement for this would not be appropriate.