

Update note for Parish and Town Council Chairman's Meeting on 17th December 2019

Consultation and Engagement on Draft Local Plan and Sustainability Appraisal

- Consultation period ran from 27th September until 15th November 2019. Originally planned to finish on 1st November, but extended by two weeks following requests.
- Consultation was very well publicised beforehand, including in eight page article in "Local" distributed to every household in the borough, plus social media posts, newspaper adverts, placing posters on TWBC land, distributing leaflets to shops, cafes, etc.
- TWBC briefed PC/TC Chairmen, Planning Agents' Forum, businesses and the Town Forum, hosted 10 public exhibitions across the borough at times that would allow different groups/individuals to attend, held two x social media Q and A sessions, presented to secondary school assemblies, and attended public meetings which officers were invited to (one larger public meeting and two x "drop ins" in Capel, Speldhurst Parish Council meeting, etc).
- Set up new consultation portal, and ensured that had officers available on the telephone to answer questions on how to make comments. Any issues were swiftly addressed, and there have been a number of people who have commented how helpful TWBC has been in facilitating commenting on the Draft Local Plan.

Representations received on Draft Local Plan and Sustainability Appraisal

- Still inputting them into the consultation portal – to be completed by 20th December 2019.
- Estimates are that over 7,000 individual comments have been received from over 2,000 responders. This is likely to be the highest response to any consultation/engagement undertaken by TWBC Planning Services.
- The comments will be available via the consultation portal, and TWBC will be preparing tables which break down the representations received by section of the Draft Local Plan (and Sustainability Appraisal) – these tables will be placed on the website.
- Particular officers have responsibility for analysing/reviewing particular sections/sub-stations.
- The Draft Local Plan already identifies some areas of further work that are required (e.g. viability assessment of the strategic sites, further transport work). The analysis of the representations will demonstrate if any further work is required (e.g. further landscape work has already been commissioned following comments from Natural England).
- Representations fall into three/four broad categories:
 - Responses from infrastructure providers/statutory consultees;
 - Responses from residents objecting to particular sites (and in many instances recognising that new development is required, but suggesting that development should be located elsewhere);

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- Developers/promoters of sites a) providing further evidence to support the proposed allocations in the Draft Local Plan, b) seeking to “knock” sites which are proposed to be allocated, whilst promoting the virtues of other (their) sites which are not currently proposed to be allocated, as alternatives, and c) submitting further land for consideration: so far approximately 20 further parcels of land have been provided.

Next steps for Draft Local Plan

- As above, to review reps and then undertake work already programmed/further required.
- This will determine whether the timetable in the current Local Development Scheme needs to be amended:
https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0019/301096/Final_LDS_September_2019.pdf

Neighbourhood Development Plans

- Will continue to work with Neighbourhood Plan Groups to progress Neighbourhood Development Plans.
- Will be times where TWBC Planning will invite Neighbourhood Plan Group representatives to be involved in pre-application/allocation meetings with site promoters/developers so there is local input. Will be considered on a case-by-case basis. TWBC Planning Services is particularly conscious that a number of planning applications have been submitted/are being prepared ahead of the Draft Local Plan timetable, and are likely to need to be determined well ahead of the Examination of the Local Plan. Reports to Planning Committee/to be made under delegated powers will clearly explain the planning policy position on such sites.
- TWBC Planning is currently recruiting additional posts to increase capacity within Planning Policy and wider Planning Services.

Housing Supply and Delivery

- The interim (12th April – 30th September 2019) housing supply position is being calculated at present.
- The emerging housing delivery test results (which looks back at housing delivery over the last three years) is looking like TWBC will (as a result of delivering 87% of its target) again have to produce an “Action Plan” explaining how it boost housing delivery in the future. The current Action Plan is available here:
http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0006/294756/Housing_Delivery_Test_Action_Plan_2017-18.pdf
- If the figure was less than 85% then an additional 20% would have been added to the five year housing supply.

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- From 2020 if a council delivers less than 75% of its target then housing provision policies will be considered out of date (i.e. the same impact of not being able to demonstrate a five year supply of housing). Given the lag time between planning permissions being granted and housing being delivered, decisions made now affect the housing delivery rate in the future....if there aren't sufficient grants of planning permission now it will be very difficult to meet the delivery test in future years.
- Further information on the "lag time" between grants of permission and development being delivered on site is set out in the Housing Supply and Trajectory Topic Paper which supported the Draft Local Plan. This is available here:
https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0020/300764/Housing_Supply_and_Trajectory_Topic_Paper.pdf
- A number of Neighbourhood Plan Groups have found this Topic Paper helpful in understanding how grants of planning permissions on different sites around a settlement within a similar time period are unlikely to mean that they will all be built out at once.

Neighbouring Authorities

- Sevenoaks District Council (SDC): Following a first tranche of examination of the SDC submission plan (which planned for 1,900 houses less than the need identified through the NPPF's standard methodology), the Planning Inspector has written to SDC expressing concerns about the soundness of the Plan. There has been an exchange of correspondence. The Planning Inspector has confirmed that it will not provide the further (and final) piece of correspondence until after the General Election. Steve Baughen will report on this to the next PC/TC Chairman meeting.
- Wealden District Council (WDC): Following a first tranche of examination of the WDC submission, a letter is expected from the Planning Inspectorate explaining its views. This will also not be released until after the general election. Many in the planning profession consider that it will not be positive for the WDC Local Plan. SB will again report on this to the next PC/TC Chairman meeting.
- Tonbridge & Malling Borough Council: TMBC submitted its plan in January 2019 under the old National Planning Policy Framework. Topic papers were provided post submission (TWBC consulted on Topic Papers as part of the recent Regulation 18 Draft Local Plan consultation). TMBC is now consulting on additional documents. An Examination is likely to now be in March 2020.
- Maidstone Borough Council has undertaken a "call for sites", and published the location of these: MBC will now be considering which to take forward as potential allocations.
- TWBC is liaising with all these authorities (and Ashford Borough Council and Rother District Council under the Duty-to-Co-operate requirements). This is exemplified by the recent three way meeting with Kent County Council Highways and Transport (all relevant KCC officers who cover TMB, MB and TMBC) and senior planning officers from TMBC, MBC and TWBC to discuss transport infrastructure requirements (highways, junctions, means of active travel, etc).
- In addition to the progress of neighbouring authorities' Local Plans, TWBC Planning Services is also conscious of those from further afield, for example a recent Court decision in relation

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to a challenge to the Guilford Borough Council Local Plan which proposes strategic releases of Green Belt. The challenge was dismissed: the planning press is reporting that this could be highly significant for plans which are similarly proposing Green Belt release.

Steve Baughen: Head of Planning Services

13th December 2019